

bankinter.

2025  
**Pillar III  
Disclosures**  
Report

***Together***



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# Contents

Executive summary	4	4.3.3. Amounts of counterparty credit risk	49
00. Introduction	8	4.3.4. CVA capital charge	53
1. General reporting requirements	10	4.4. Information on the standardised approach	54
1.1. Company name and differences among the consolidated Group for the purposes of the capital adequacy regulation and the accounting circular	10	4.4.1. Information on external credit assessment institutions	54
1.1.1. Company name and scope of application	10	4.4.2. Assignment of SCRA grades for financial institutions without ratings	55
1.1.2. Differences among the consolidated Group for the purposes of capital adequacy and accounting regulations	10	4.4.3. Credit ratings of public securities issues	55
1.1.3. Reconciliation of the public balance sheet from the accounting scope to the regulatory scope	10	4.4.4. Exposure values before and after application of credit risk mitigation techniques	55
1.1.4. Main changes in the Group's scope of consolidation in 2025	15	4.4.5. Breakdown of exposure values by risk weights	56
1.2. Subsidiaries with shareholders' equity below the required minimum	16	4.5. Information on the IRB approach	59
1.3. Exemptions to capital charges at an individual or sub-consolidated level	16	4.5.1. General information	59
1.4. Risk management and control system: risk management policies and objectives	16	4.5.2. Exposure values by category and obligor levels	61
1.4.1. Principles and culture of risk management and control	16	4.5.3. Risk weightings of specialised lending exposures	71
1.4.2. Governance of the risk function	17	4.5.4. Probability of Default (PD) per portfolio	72
1.4.3. Three lines of defence model	18	4.5.5. Credit risk mitigation techniques	79
1.5. Risk mitigation and hedging policies. Supervision strategies and processes	18	4.5.6. Changes in the period in terms of risk-weighted assets in advanced IRB models	81
2. Information on shareholders' equity	20	4.6. Securitisations	81
2.1. Elements that constitute shareholders' equity	20	4.6.1. General characteristics	81
2.2. Amount of shareholders' equity	21	4.6.2. Securitisations originated	83
2.3. Capital buffers	23	4.6.3. Investment securitisations	86
2.4 MREL and TLAC	25	4.7. Information on credit risk mitigation techniques	86
3. Information on key indicators and shareholders' equity requirements	30	4.7.1. Main characteristics of credit risk mitigation policies	86
3.1. Breakdown of risk-weighted exposure	30	4.7.2. On-balance sheet and off-balance sheet netting	86
3.2. Output floor	34	4.7.3. Coverage based on collateral	86
3.3. Description of the internal capital adequacy assessment process	36	4.7.4. Risk concentration	87
4. Credit risk	38	5. Market risk in the Assets held for trading portfolio	89
4.1. Information on credit risks	38	5.1. Differences in Assets held for trading for the purposes of Regulation (EU) 575/2013 on prudential requirements for credit institutions and investment firms	89
4.1.1. Impairment of financial assets	38	5.2. Characteristics of the risk management system and models used	89
4.1.2. Transfers and removals from the balance sheet of financial instruments	40	5.3. Own funds requirements for market risk	91
4.1.3. Criteria for the recognition of earnings when removing assets from the balance sheet	41	6. Operational risk	93
4.2. Information on exposure to credit risk	42	6.1. Management of operational risk	93
4.2.1. Maturity of exposures:	42	6.1.1. Risk management policies and objectives	93
4.2.2. Credit quality of credit risk exposures:	43	6.1.2. Operational risk control and management function structure and organisation	93
4.3. Information on counterparty credit risk	48	6.1.3. Coverage and nature of the measurement system	94
4.3.1. Counterparty credit risk management policy	48	6.1.4. Coverage and nature of the information framework for operational risk	94
4.3.2. Collateral policy and policy regarding the risk of negative correlations	49	6.1.5. Policies and strategies for risk reduction and risk coverage	94
		6.2. Operational risk losses	94
		6.3. Methods for calculating and assessing operational risk	95
		6.4. Risk-weighted exposure and operational risk capital charge	96

7. Equity investments and capital instruments not included under 'Assets held for trading'	98	13.3 Environmental risk	145
7.1. Distinction between portfolios held for sale and for strategic purposes	98	13.3.1. Business strategies and processes	145
7.1.1. Portfolio at fair value through profit or loss	98	13.3.2. Governance	146
7.1.2. Portfolio at fair value through other comprehensive income	98	13.3.3. Risk management	147
7.1.3. Portfolios held for strategic purposes	98	13.3.4. Identification and measurement	154
7.2. Accounting principles and measurement of instruments	98	13.3.5. Assessment	164
7.3. Carrying amount of equity investments and capital instruments	99	13.3.6. Action	166
8. Structural interest rate and foreign exchange risk	101	13.3.7. European Taxonomy requirements	176
8.1. Interest rate risk of positions not included in the trading book	101	13.4. Social risk	177
8.1.1. Scope and governance of structural interest rate risk	101	13.4.1. Business strategy and processes	177
8.1.2. General structural strategies for managing and controlling structural interest rate risk	101	13.4.2. Governance	188
8.1.3. Methods of measurement. Assumptions	102	13.4.3. Risk management	191
8.1.4. Regulatory scenarios for interest rate shocks	103	13.5. Governance risk	192
8.1.5. Current exposure to structural interest rate risk: supervisory approach	103	13.5.1. Governance and risk management	192
8.1.6. Internal scenarios for interest rate shocks	104	13.6. Indicators of potential transition risk linked to climate change	202
8.1.7. Current exposure to structural interest rate risk: internal management approach	104	13.6.1. Credit quality of exposures by sector, issues and residual maturity	202
8.2. Exchange rate risk	105	13.6.2. Loans collateralised by immovable property – energy efficiency of the collateral	205
8.2.1. Management of structural foreign currency risk	105	13.6.3. Indicators of potential transition risk linked to climate change: harmonisation parameters	207
9. Liquidity and funding risk	107	13.6.4. Exposures to the top 20 carbon-intensive firms	208
9.1. Governance and monitoring of funding and liquidity risk	107	13.7. Climate change physical risk:	208
9.2. Liquidity and funding prospects	108	13.7.1. Exposures subject to physical risk	208
9.3. Liquidity coverage ratio (LCR)	108	Annexes:	212
9.4. Net stable funding ratio (NSFR)	111	Annex I: CCA - Main features of regulatory own funds instruments and eligible liability instruments	212
10. Leverage	116	Annex II: CC1 - Composition of regulatory Own Funds.	216
10.1. Definition and composition of the leverage ratio	116	Annex III. LI3: Outline of differences in consolidation groups (bank by bank)	220
10.2. Trends in the leverage ratio	121		
10.3. Managing the risk of excessive leverage	121		
11. Information on asset encumbrance	123		
12. Remuneration	128		
12.1. Information on the decision-making process for establishing the remuneration policy	128		
12.2. Principles of Bankinter's remuneration policy	129		
12.3. Description of the types of employees and executives considered identified staff	129		
12.4. Characteristics of the remuneration scheme applied to identified staff	130		
12.5. Quantitative information on the remuneration policy	135		
13. Environmental, Social and Governance (ESG) Risks	140		
13.1. Information on the main ESG risks	140		
13.2. Sustainability strategy	140		

## Executive summary

Bankinter Group ended 2025 with double-digit earnings growth, which for the first time ever exceeded the 1,000 million euro mark, driven by an increasingly diversified commercial mix across all businesses and geographies in which the bank operates, and by a strategic focus on higher value-added products and activities. The results achieved in 2025 - when the Group celebrated its 60th anniversary - were very positive, with growth in both the loan book and funds, and net profit of 1,090 million euros.

The various ratios in the account demonstrate the strength of the bank's balance sheet and its results. More precisely, the return on equity (ROE) improved to 18.9% from 17.9% a year ago, while the ROTC ended the year at 20%, up from 19% a year earlier. The cost-to-income ratio stood at 36.1%, one of the leaders in the sector.

The CET1 capital ratio also improved during this period, reaching 12.72%, i.e. 436 basis points above the minimum required for Bankinter Group in compliance with the Pillar 1 requirements, the ECB's Pillar 2 requirements for 2025 and the additional macroprudential buffers set by the authorities in the jurisdictions where the Group operates, amounting to 8.36%.

The non-performing loan ratio stood at 1.94% at year-end, with coverage for non-performing loans rising to 67.9% for prudential reasons.

In 2025, Bankinter continued to increase its business volumes, diversify its sources of income and, as a result, expand its market share across all product categories, services and customer segments in which the Bank competes, with a clearly differentiated and highly recognisable value proposition.

Among the geographies in which the Group operates, Spain continues to make the largest contribution to the Group's gross operating income, although the other markets are increasing their contribution at a faster pace. This is true of both Portugal and, especially, Ireland, where the non-trading book grew by 23%, with a strong boost from mortgages.

Generative artificial intelligence is also playing an increasingly important role within the bank in improving the efficiency of processes, employee productivity and the quality of service for customers. This is an area Bankinter is promoting through its 'AI First' programme, which is being led by the CEO and is aligned with the entity's business objectives.

Over the past decade, Bankinter has demonstrated a strong commitment to sustainability by integrating environmental, social and governance (ESG) criteria into its corporate strategy. The lines of action in this strategy are structured around sustainability plans, with the 2024-2026 DNA Plan currently being in force.

The optimisation of capital and the maintenance of a moderate risk profile are hallmarks of the Group and create the foundations for continued and sustainable growth.

Its management policy, its business model and prudent risk profile allow Bankinter Group to operate with levels of capital that are clearly above and beyond those required by regulators and supervisors. These qualities contribute to shareholders receiving a solid remuneration with continuity over time.

This document contains detailed information on capital and risk management in Bankinter Group at 31 December 2025. It provides useful information on capital and the entity's risk profile in order to foster transparency for market participants and comply with the disclosure requirements in Regulation (EU) 575/2013 (CRR), which was amended from 1 January 2025 by Regulation 2024/1623 (CRR3) with regard to presentation and disclosure requirements.

As mentioned in the previous paragraph, and as indicated in note 48 to the Group's consolidated financial statements, the provisions of CRR3 with respect to requirements for the Group's credit risk, operational risk and the output floor for risk weighted assets came into effect on 1 January 2025. The main aim of this reform is to implement the latest amendments to the Basel capital framework in the EU. This reform also includes new requirements for market risk (FRTB), the entry into force of which has been delayed until 1 January 2027. CRR3 also includes a number of provisions allowing transitional application of some of the new requirements. Of these, Bankinter has only made use of the transitional application provided for in article 495 quinquies for unconditionally cancellable commitments, which permits the requirement of 10% of the conversion factor for this type of exposure to be deferred until 2033. Not applying this transitional provision to the CET1 ratio would have resulted in a reduction of 19 basis points at the end of 2025. This impact is variable over time and its continued management will enable its gradual reduction.

The Group publishes additional relevant information in its annual report that can be viewed on its corporate website: ([www.bankinter.com/webcorporativa](http://www.bankinter.com/webcorporativa))

### Risk profile

One of Bankinter Group's primary objectives is to maintain a moderate and prudent risk profile, which will allow it to obtain a balanced and healthy balance sheet and income that is recurring and sustainable over time while maximising long-term value for its shareholders.

The board of directors uses the risk appetite framework as a tool to establish the risk levels at which it wishes to operate to achieve the Group's strategic objectives and to continuously monitor both existing and emerging risks. The Group's internal capital adequacy assessment process (ICAAP) allows Bankinter's board of directors to assess the present and future adequacy of its capital in relation to the Group's risk profile and the suitability of its risk management and control systems on a regular basis. The Risk Appetite Framework and Internal Capital Adequacy Assessment Process are dealt with in further depth in points 1.4.2 and 3.2 hereof, respectively.

The following metrics reflect the Group's risk profile: at year-end 2025, they were all within the risk appetite limits set by the board of directors:

## Main figures of Bankinter Group

	2025	2024
Common equity tier 1 – CET1 (%) (Chapter 2)	12.72 %	12.41 %
Common equity tier 1 – CET1 (Chapter 2)	5,781,431	5,272,237
Profit after tax (Annual Report)	1,089,976	952,971
RoE (Annual Report)	18.9 %	17.9 %
NPL ratio (Annual Report)	1.94 %	2.11 %
Risk-weighted assets (Chapter 3)	45,453,891	42,475,608
Of which credit risk (Chapter 3)	39,196,323	37,209,028
Of which market risk (Chapter 3)	356,089	374,877
Of which operational risk (Chapter 3)	5,816,919	4,529,276
Liquidity Coverage Ratio - LCR 12m average (Chapter 9)	197.36 %	188.38 %
Leverage ratio (Chapter 10)	5.26 %	5.03 %

Figures in thousands of euros

The CET1 ratio and amount were "Fully Loaded" until the application of CRR3. Since the entry into force of the new regulations, the ratio only benefits from the transitional adjustment under article 495 quinquies, on transitional provisions for unconditionally cancellable commitments.

As of 31 December 2025, Bankinter Group's CET1 ratio (%) stood at 12.72%, compared to the minimum of 8.36% required by Pillar 1, as required by Pillar 2 and established by the European Central Bank (ECB) for 2025 and the macroprudential buffers established by the authorities of the jurisdictions in which the Group operates.

The following table shows the capital requirements applicable to Bankinter Group at various dates, reflecting the estimated performance of capital requirements in 2025 and 2026.

## Requirements of Bankinter Group's supervisors

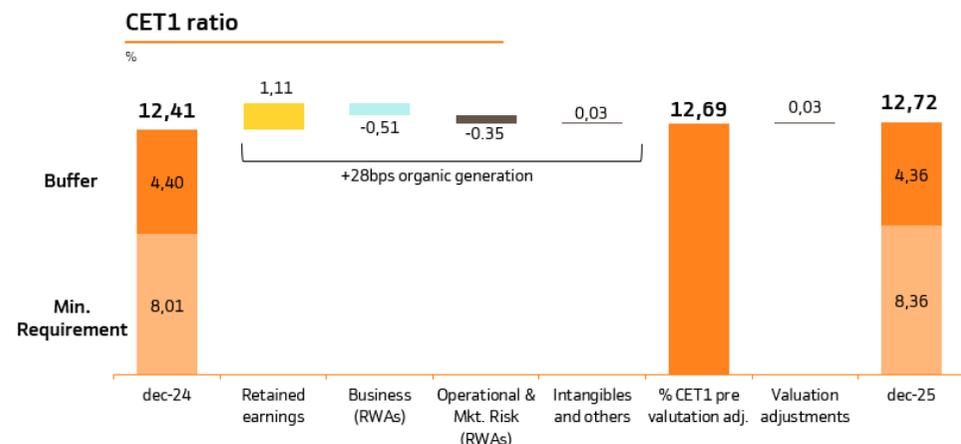
	Q4 24	Q4 25	Q1 26 (E)	Q4 26 (E)
Pillar 1 requirement	4.50 %	4.50 %	4.50 %	4.50 %
Pillar 2 Requirement (P2R) to be covered with CET1	0.78 %	0.73 %	0.84 %	0.84 %
Capital conservation buffer	2.50 %	2.50 %	2.50 %	2.50 %
Countercyclical buffer Ireland	0.08 %	0.08 %	0.08 %	0.08 %
Countercyclical buffer Spain	0.00 %	0.41 %	0.41 %	0.81 %
Countercyclical buffer Portugal	0.00 %	0.00 %	0.00 %	0.10 %
Portugal systemic risk buffer requirement	0.15 %	0.15 %	0.15 %	0.15 %
<b>Minimum aggregate CET1 requirement</b>	<b>8.01 %</b>	<b>8.36 %</b>	<b>8.47 %</b>	<b>8.99 %</b>
Pillar 1 Additional Tier 1 (AT1) requirement	1.50 %	1.50 %	1.50 %	1.50 %
Pillar 2 requirement (P2R) to be covered with AT1	0.26 %	0.24 %	0.28 %	0.28 %
Tier 2 requirement	2.00 %	2.00 %	2.00 %	2.00 %
Pillar 2 requirement (P2R) to be covered with Tier 2	0.35 %	0.33 %	0.38 %	0.38 %
<b>Minimum total capital requirement</b>	<b>12.12 %</b>	<b>12.43 %</b>	<b>12.63 %</b>	<b>13.14 %</b>
Memorandum items: Aggregate P2R requirement	1.39 %	1.30 %	1.50 %	1.50 %

The minimum CET1 requirement was increased in the last quarter of 2025 with the entry into force of a 41 bp countercyclical buffer in Spain.

The Pillar 3 Disclosures Report provides particulars of the regulatory risk measures reflecting the Group's risk profile and strategy.

The following chart shows Bankinter Group's CET1 ratio at December 2024 and December 2025, breaking down the increase in the ratio:

### CET1 ratio



In 2025, credit risk requirements increased as a result of the growth in lending due to the Bank's increased business drive, particularly in large-corporate banking in Spain. The market risk requirements - which are still calculated under the previous regulations pending the entry into force of the new FRTB framework - remain at similar levels to the previous year, in line with the performance of the bank's trading book and the market. There was an increase in operational risk requirements, due mainly to application of the new capital regulations, first in March 2025 and then at the end of the year in the annual update.

Under resolution regulations, entities must comply with a minimum requirement for shareholders' equity and eligible liabilities (MREL), which is calculated for each entity. The Single Resolution Board (SRB) determined that Bankinter should comply with a total binding MREL requirement at a consolidated level of 20.31% of its total risk exposure (TREA) and 6.39% of its leverage ratio exposure (LRE) from 17 December 2024.

The bank must also meet an additional subordinated MREL (to be covered solely by own funds and eligible subordinate liabilities) equivalent to 15.80% of the TREA and 6.39% of the LRE.

At 31 December 2025, Bankinter Group complied with these requirements, with its MREL standing at 25.67% and the subordinated MREL of Bankinter at 21.81%. In January 2026, the SRB determined that Bankinter should comply from that date, at a consolidated level, with a total binding MREL requirement of 20.24% of total risk exposure and 6.52% of leverage ratio exposure. The SRB notification also established that subordinated instruments must be used to comply with the MREL for an amount equivalent to 15.38% of TREA and 6.52% of LRE.

The MREL requirements set forth are in line with Bankinter's forecasts and are comfortably met, both in terms of percentage TREA and percentage LRE. The long-term financing plan also provides for continued comfortable meeting of future requirements.

### Review of Pillar 3 report

Pursuant to Article 431(3) of Regulation (EU) n° 575/2013 and Rule 59 of Circular 2/2016, of 2 February, issued by the Bank of Spain, Bankinter's statutory auditor has issued an agreed-upon procedures report based on certain verification procedures in relation to this Pillar 3 report (prudential disclosures) for the financial year ended 31 December 2025. As a result of the procedures performed, no exceptions were identified in the aforementioned report.

00

# Introduction



## 00. Introduction

The applicable legislation on capital and consolidated supervision of Spanish credit institutions comprises Regulation (EC) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and Regulation (EC) No 2024/1623 (CRR3), together with Directive (EC) No 2013/36/EC of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision, as amended by Directive (EC) No 2024/1619 (CRD VI), which has been in force since 11 January 2026.

CRR3 repeals the regulation implemented to mitigate the effects on the financial system of the COVID-19 pandemic, Regulation No. 2020/873 of the European Parliament and of the Council, known as "CRR Quick Fix", and the previous reform of Regulation 575/2013 ("CRR"), Regulation No. 2019/876 ("CRR2").

Under part 8 of the first chapter of the Regulation, institutions must publish, at least annually, relevant information for an adequate understanding of the Group's risk profile, its policies and objectives in risk management, and details of its exposure to different risks and the composition of its capital base. This report is a reflection of these requirements for Bankinter Group in 2025.

The purpose of this report is to facilitate market agents' assessment of Bankinter Group's capital adequacy at 31 December 2025. Specifically, it contains information about its own funds, risk exposures and risk assessment processes.

This report was drawn up in observation of article 432.2 of the cited Regulation regarding confidential information. Bankinter Group states that it has not omitted any required information for reasons of confidentiality or privacy.

The board of directors of Bankinter certifies that this report has been prepared and published in accordance with the instructions set forth in Part Eight of Regulation (EU) 575/2013, as amended by Regulation (EU) 2024/1623, and has been prepared in accordance with the "Bankinter economic and financial, non-financial, risk management and corporate reporting policy" initially approved by the board of directors on 16 December 2020, and subsequently amended on 20 October 2021.

No use has been made of exceptions to the publication of information considered reserved or confidential.

At its meeting on 26 March 2026, the board of directors approved this document after review by the audit committee.

Additionally, a set of quarterly reports is published in compliance with the criteria established in the European Banking Authority's Guidelines on Materiality, Proprietary and Confidentiality and on Disclosure Frequency under Articles 432(1), 432(2) and 433 of Regulation (EU) 575/2013.

01

## General reporting requirements



# 1. General reporting requirements

## 1.1. Company name and differences among the consolidated Group for the purposes of the capital adequacy regulation and the accounting circular

### 1.1.1. Company name and scope of application

Bankinter, S.A. was incorporated in Madrid as a bank on 4 June 1965 and changed its name to the present name in July 1990. The Entity's corporate purpose is the development of the banking activities, and it is subject to the standards and regulations applicable to credit institutions operating in Spain.

The Bank is the parent company of a group of subsidiaries that are engaged in various activities (mainly asset management, investment services, credit cards and the insurance business) that, with it, constitute Bankinter Group.

The consolidated group conducts its business in Spain, except its subsidiary Bankinter Luxembourg S.A., which conducts its business in another European Union member state, Luxembourg, Bankinter's branches in Portugal, which, since the acquisition of a part of Barclays Bank PLC's banking business in Portugal was completed on 1 April 2016, conduct their business in another European Union member state, Portugal, and, since 1 June 2019, Ireland, through the acquisition of 100% of EVO BANCO, S.A.U. and, consequently, of its consumer finance subsidiary in Ireland, Avantcard D.A.C.

Bankinter Consumer Finance, E.F.C., S.A. is currently the parent of Avantcard, D.A.C. after acquiring all the shares comprising its share capital.

On 30 November 2023, Bankinter Consumer Finance, E.F.C. and Sonae SGPS, S.A. entered into a joint business agreement for the Portuguese consumer credit market. This agreement involved the acquisition by Bankinter Consumer Finance, E.F.C. of 50% of the company Universo, IME, S.A. on that date, with this company now belonging to both institutions in equal shares. The transaction was completed after obtaining the necessary authorisations from supervisors. The agreement signed provides for the future integration of the loan and insurance business generated by Universo and Bankinter Consumer Finance in Portugal, subject to obtaining the necessary authorisations from the competent authorities. Universo, IME, S.A. is a joint venture integrated into the group's consolidated financial statements using the equity method. Prudentially, the integration of the joint business with Sonae involves the integration of Universo, IME, S.A. using the proportional method.

In 2025, a merger by absorption took place between Bankinter, S.A. (as the absorbing company) and EVO Banco, S.A.U. (as the absorbed company).

During the year, a merger by absorption also took place between Bankinter, S.A. (as the absorbing company) and Avantcard DAC (absorbed entity).

The consolidated financial statements of Bankinter Group ([www.bankinter.com/webcorporativa](http://www.bankinter.com/webcorporativa)) provides additional information on Bankinter Group and its subsidiaries.

### 1.1.2. Differences among the consolidated Group for the purposes of capital adequacy and accounting regulations

The data in this report refer to the consolidated Bankinter Group.

The definition of the Group is based on prevailing accounting legislation. In this, participated entities are defined as all subsidiaries, jointly-controlled entities and associates. Subsidiaries are entities over which the Group has the ability to exercise control. Jointly-controlled entities are participated entities that are not subsidiaries. They are jointly controlled by the Group and another company or companies not related to the Group, and joint ventures. Associates are companies over which the Group has significant influence.

The list of the companies making up Bankinter Group is provided in Note 13 to the Group's consolidated financial statements.

The public consolidation scope differs from the prudential consolidation scope for banking under Regulation (EU) 575/2013 on prudential requirements for credit institutions and investment firms, as modified by Regulation (EU) 2024/1623, which defines the prudential consolidation method. Under the definition of prudential relevance for the purposes of this report, only the typical risks of credit, investment and financial institutions are included. Risks arising from insurance business are excluded. A material difference for Bankinter is the consolidation method for companies under joint control.

At the end of December 2025, the only difference between the scope of prudential consolidation and the public scope of Bankinter Group was due to the integration of the joint agreement with Sonae SGPS, S.A., in which the company Universo, IME, S.A. is integrated by the proportional method in the prudential scope and by the equity method in the public scope.

### 1.1.3. Reconciliation of the public balance sheet from the accounting scope to the regulatory scope

Below are templates CC2, LI1 and LI2, as required by Commission Implementing Regulation (EU) 637/2021. The first template provides a breakdown of assets and liabilities by class according to the statement of financial position of the audited financial statements published in the consolidated financial statements and their reconciliation to own funds for the purposes of the solvency rules.

At 31 December 2025, the Group's public and reserved balance sheet information reported in templates CC2 and LI1 was as follows:

**Reconciliation of regulatory shareholders' equity to the statement of financial position of the audited financial statements (CC2).**

	a)	b)	c)
	Balance sheet as per the published financial statements	In relation to regulatory consolidation	Benchmark
	At end of period	At end of period	
<b>Assets - Breakdown by asset class according to the balance sheet of the audited financial statements</b>			
1	Cash, cash balances at central banks and other demand deposits	15,000,351	15,001,876
2	Financial assets held for trading	4,440,246	4,440,246
3	Financial assets designated at fair value through profit or loss	–	–
4	Non-trading financial assets mandatorily at fair value through profit or loss	324,996	324,996
5	Financial assets at fair value through other comprehensive income	886,647	886,648
6	Financial assets at amortised cost	107,804,402	107,871,355
7	Fair value changes of the hedged items in portfolio hedge of interest rate risk	-742,833	-742,833
8	Derivatives - Hedge accounting	1,227,222	1,227,222
9	Non-current assets held for sale	133,362	133,362
10	Investments in joint ventures and associates	244,435	198,485
11	Assets covered by insurance and reinsurance contracts	–	–
12	Tangible assets	466,831	467,704
13	Intangible assets	370,906	383,937
14	Tax assets	654,553	658,849
15	Other assets	207,775	211,278
16	<b>Total assets</b>	<b>131,018,892</b>	<b>131,063,125</b>
<b>Liabilities - Breakdown by class of liabilities according to the balance sheet of the audited financial statements</b>			
1	Financial liabilities held for trading	1,789,191	1,789,191
2	Financial liabilities designated at fair value through profit or loss	–	–
3	Financial liabilities at amortised cost	121,552,460	121,585,489
4	Fair value changes of the hedged items in portfolio hedge of interest rate risk	–	–
5	Derivatives - Hedge accounting	136,191	136,191
6	Liabilities held for sale	–	–
7	Liabilities under insurance contracts	–	–
8	Provisions	289,355	290,684
9	Tax liabilities	492,291	502,451
10	Share capital repayable on demand	–	–
11	Other liabilities	347,919	347,635
12	<b>Total liabilities</b>	<b>124,607,408</b>	<b>124,651,641</b>
<b>Own funds</b>			
1	Equity, of which:	6,445,711	6,445,711
2	Capital	269,660	269,660

Note 21, item (a) of the notes to the Group's financial statements

3	Share premium	—	—	Note 21, item (b) of the notes to the Group's financial statements
4	Other items of equity	24,146	24,146	Note 21, item (d) of the notes to the Group's financial statements
5	Retained earnings	5,498,881	5,490,505	Note 21, item (c) of the notes to the Group's financial statements
6	Other reserves	-28,912	-20,536	Note 21, item (c) of the notes to the Group's financial statements
7	Own shares	-2,285	-2,285	Note 21, item (e) of the notes to the Group's financial statements
8	Profit or loss attributable to owners of the parent company	1,089,976	1,089,976	Note 21, item (g) of the notes to the Group's financial statements
9	Interim dividends	-405,755	-405,755	Note 21, item (h) of the notes to the Group's financial statements
10	Other accumulated comprehensive income	-34,227	-34,227	Note 22 of the notes to the Group's financial statements
11	<b>Total equity</b>	<b>6,411,483</b>	<b>6,411,484</b>	
	<b>TOTAL EQUITY AND LIABILITIES</b>	<b>131,018,892</b>	<b>131,063,125</b>	

Figures in thousands of euros

## Differences between the scope of accounting consolidation and the scope of prudential consolidation and consistency of financial statement categories with regulatory risk categories (LI1)

		a	b	c	d	e	f	g
		Carrying amounts in the financial statements	Carrying amounts under the prudential consolidation group	Carrying amounts of items				
				Subject to credit risk framework	Subject to counterparty credit risk framework	Subject to the securitisation framework	Subject to market risk framework	Not subject to shareholders' equity requirements or subject to deduction from shareholders' equity
Breakdown by asset class according to the balance sheet in the published financial statements								
1	Cash, cash balances at central banks and other demand deposits	15,000,351	15,001,876	15,001,876				
2	Financial assets held for trading	4,440,246	4,440,246		1,932,797		2,507,449	
3	Financial assets designated at fair value through profit or loss							
4	Non-trading financial assets mandatorily at fair value through profit or loss	324,996	324,996	324,996				
5	Financial assets at fair value through other comprehensive income	886,647	886,648	886,648				
6	Financial assets at amortised cost	107,804,402	107,871,355	99,084,084	8,626,554	160,718		
7	Fair value changes of the hedged items in portfolio hedge of interest rate risk	-742,833	-742,833					-742,833
8	Derivatives - Hedge accounting	1,227,222	1,227,222		1,227,222			
9	Non-current assets held for sale	133,362	133,362	133,362				
10	Investments in joint ventures and associates	244,435	198,485	198,485				
11	Assets covered by insurance and reinsurance contracts							
12	Tangible assets	466,831	467,704	467,704				
13	Intangible assets	370,906	383,937	182,272				201,665
14	Tax assets	654,553	658,849	199,790				459,060
15	Other assets	207,775	211,278	211,278				
<b>16</b>	<b>TOTAL ASSETS</b>	<b>131,018,892</b>	<b>131,063,125</b>	<b>116,690,494</b>	<b>11,786,573</b>	<b>160,718</b>	<b>2,507,449</b>	<b>-82,108</b>
		a	b	c	d	e	f	g
		Carrying amounts as published in the financial statements	Carrying amounts under the prudential consolidation group	Carrying amounts of items				
				Subject to the credit risk framework	Subject to counterparty credit risk framework	Subject to the securitisation framework	Subject to market risk framework	Not subject to shareholders' equity requirements or subject to deduction from shareholders' equity
Breakdown by asset class according to the balance sheet in the published financial statements								
1	Financial liabilities held for trading	1,789,191	1,789,191		681,519		1,107,672	
2	Financial liabilities designated at fair value through profit or loss							
3	Financial liabilities at amortised cost	121,552,460	121,585,489		19,654,838			101,930,651
4	Fair value changes of the hedged items in portfolio hedge of interest rate risk							
5	Derivatives - Hedge accounting	136,191	136,191		136,191			
6	Liabilities held for sale							
7	Liabilities under insurance contracts							
8	Provisions	289,355	290,684	29,134				261,550
9	Tax liabilities	492,291	502,451					502,451
10	Share capital repayable on demand							
11	Other liabilities	347,919	347,635					347,635
<b>12</b>	<b>TOTAL LIABILITIES</b>	<b>124,607,408</b>	<b>124,651,641</b>	<b>29,134</b>	<b>20,472,548</b>	<b>0</b>	<b>1,107,672</b>	<b>103,042,287</b>

Figures in thousands of euros

As described in the previous point, at the end of December 2025 the differences between column a) and b) of table LI1, accounting and prudential consolidation, total 44 million euros, with the prudential balance being higher, corresponding to the joint business agreement between Bankinter Consumer Finance, E.F.C. and Sonae SGPS, S.A. The main differences in the items are explained below:

- The group owns 50% of the company Universo IME. The public statements therefore reflect the cost of the shareholding acquired using the equity method, while in the reserved statement 50% of the accounting items of Universo IME are included in both in the balance sheet and in the income statement.
- In addition, Bankinter finances the activity of Universo IME through two loans, whose drawdown amounts to 389 million at the end of the reporting period, which is reflected in the public balance sheet in financial assets at amortised cost, while 50% of the loan is eliminated in the prudential balance sheet.
- 50% of the assets and liabilities of this company are included in the Group's prudential balance sheet, primarily financial assets and liabilities at amortised cost that do not appear on the public balance sheet since they are recognised using the equity method and therefore included in the cost of the holding.
- Finally, 50% of the Universo IME income statement is included in the Group's income statement, while in the public balance sheet it is only reflected in the contribution of the results of companies using the equity method.
- Shareholders' equity is the same in both scopes of consolidation since the after-tax profits of both scopes produce the same result.

Therefore, Universo IME is the source of the difference between the prudential balance and the public balance shown in table LI1.

Starting from the prudential assets and liabilities in table LI1, table LI2 breaks down the differences between the carrying amount in the prudential consolidation scope and the amounts considered for regulatory purposes, with the total exposure for regulatory purposes amounting to 123,823 million euros.

## Main reasons for the difference between the amounts of exposures for regulatory purposes and the carrying amounts in the financial statements (LI2)

	a	b	c	d	e
	Total	Items subject to			
		Credit risk framework	Securitisation framework	Counterparty credit risk framework	Market risk framework
1 Asset carrying value amount under scope of prudential consolidation (as per template LI1)	131,145,233	116,690,494	160,718	11,786,573	2,507,449
2 Liabilities carrying value amount under scope of prudential consolidation (as per template LI1)	21,609,354	29,134		20,472,548	1,107,672
3 Total net amount in the scope of consolidation prudence	109,535,878	116,661,360	160,718	-8,685,976	1,399,776
4 Off balance sheet amounts	30,862,887	30,862,887			
5 Differences in valuations	-7,673			-7,673	
6 Differences due to different netting rules, other than those included in row 2	8,757,926			10,157,702	-1,399,776
7 Differences due to consideration of provisions	-563,103	-563,103			
8 Differences due to the use of credit risk mitigation techniques	-1,395,396	-1,395,396			
9 Differences due to credit conversion factors	-22,825,176	-22,825,176			
10 Differences due to securitisations with risk transfer	-14,992		-14,992		
11 Other differences	-526,565	-526,565			
12 Exposure amounts considered for regulatory purposes	123,823,787	122,214,007	145,726	1,464,053	0

Figures in thousands of euros

### 1.1.4. Main changes in the Group's scope of consolidation in 2025

Note 13 of the consolidated financial statements for the financial year 2025 describes the most significant events with an impact on the Group's consolidation scope that occurred in 2025 (we also present the most significant events of the previous financial year), which are detailed below:

- On 19 June 2024, the boards of directors of EVO Banco, S.A.U. and Bankinter, S.A. formulated the joint project for the merger by absorption of EVO Banco by Bankinter. Bankinter's board of directors approved the project on 26 July 2024, in accordance with Article 53 of Royal Decree-Law 5/2023. The merger was subject to authorisation from the Ministry of Economy, which was granted on 25 November 2024. The deed of merger was signed and filed with the Commercial Registry on 1 April 2025. The effective date for accounting purposes is 1 January 2024, applying the merger retroactively to that financial year. The IT integration of EVO Banco took place in the third quarter of 2025. This operation only impacts the financial statements of the parent company Bankinter, S.A. It has no direct impact on the consolidated financial statements since EVO Banco already formed part of the consolidation perimeter of Bankinter Group.
- On 17 April 2024, the boards of directors of Bankinter, S.A., the parent company of Bankinter Group, and Avantcard DAC, a subsidiary company wholly owned by Bankinter, S.A., agreed to carry out a merger by absorption, thus integrating Avantcard DAC into the structure of Bankinter, S.A. and improving the Group's profitability and efficiency. On 1 April 2025, Bankinter, S.A. and Avantcard DAC

were merged and a Bankinter branch was established, to which all assets, liabilities, rights, obligations and other legal relationships acquired by Bankinter, S.A. as a result of the merger were assigned. This branch operates as a permanent establishment in Ireland and has taken over the activities previously carried out by Avantcard DAC in that jurisdiction. This operation only impacts the financial statements of the parent company Bankinter, S.A. It has no direct impact on the consolidated financial statements since Avantcard DAC already formed part of the consolidation perimeter of Bankinter Group.

- In the first half of 2025, Group subsidiary Bankinter Hogar y Auto, S.A. de Seguros y Reaseguros, Unipersonal was wound up, liquidated and dissolved. This subsidiary was wholly owned by Bankinter, S.A. The liquidation of this company has had no significant impact on the consolidated financial statements.
- In November 2025, Bankinter's board of directors agreed to give a new boost to the Bank's strategy in the areas of consumer lending and payment methods, integrating the differential capabilities that had previously been conducted by its wholly owned consumer subsidiary, Bankinter Consumer Finance, EFC, S.A. Once the boards of directors of Bankinter and Bankinter Consumer Finance approve the respective merger projects and the pertinent regulatory authorisations have been obtained, the teams and capabilities will be fully integrated. The merger is expected to be completed during 2026.

- In February 2024, EVO Banco, S.A.U. carried out a capital increase for a nominal amount of 5 million euros and an issue premium of 75 million euros, which allowed it to increase its shareholder equity by 80 million.
- In 2022, Bankinter and Liberty Seguros reached an agreement to jointly develop the insurance business through the company Bankinter Liberty Home and Auto, S.A. However, the parties withdrew from this agreement in 2024.
- On 19 June 2024, the boards of directors of Bankinter, S.A., the parent company of Bankinter Group, and EVO Banco, S.A.U., a subsidiary company wholly owned by Bankinter, S.A., agreed to carry out a merger by integration, thus incorporating EVO Banco into the structure of Bankinter, S.A. and improving the Group's profitability and efficiency.
- On 17 April 2024, the boards of directors of Bankinter, S.A., the parent company of Bankinter Group, and Avantcard DAC, a subsidiary company wholly owned by Bankinter, S.A., agreed to carry out a merger by integration, thus incorporating Avantcard DAC into the structure of Bankinter, S.A. and improving the Group's profitability and efficiency.

## 1.2. Subsidiaries with shareholders' equity below the required minimum

None of the subsidiary institutions included in the consolidated Group present an amount of shareholders' equity below the minimum required by the applicable legislation.

There is no current or foreseeable legal or practical obstacle relevant to the transfer of shareholders' equity or repayment of liabilities between the subsidiary institutions and the parent company.

## 1.3. Exemptions to capital charges at an individual or sub-consolidated level

Bankinter Group asked Bank of Spain for a waiver for the application of prudential requirements on an individual basis to Bankinter, S.A. and Bankinter Consumer Finance E.F.C., S.A. for reasons of efficiency and better management and given that the Group's characteristics guarantee the adequate distribution of shareholders' equity between the parent company and the subsidiary and the free movement of flows and commitments within the Group. The Bank of Spain authorised both exemptions by means of a letter sent to the Entity dated October 8, 2009, which remains in force under the supervision of the ECB.

## 1.4. Risk management and control system: risk management policies and objectives

Quality risk management is essential for the business of any credit institution and, in particular, those like Bankinter Group, which carry out their activity mainly in the retail sector and consider the trust of their customers and shareholders to be a core value.

Adequately identifying, measuring, managing and controlling the relevant risks of all the Group's businesses is a priority of the board of the directors. To do that, the Group establishes the basic mechanisms and principles for proper management, so that it can achieve the Group's strategic goals, protect the Group's results and reputation, defend the interests of shareholders, customers, other stakeholders and society in general, and ensure business stability and financial strength on a sustained basis over time.

The risk management and control system is described in [Note 44 to the 2025 consolidated financial statements](#) and section 7 of the [2025 annual corporate governance report](#), both of which are available on Bankinter's website, detailing: i) the main financial and non-financial risks faced by Bankinter Group due to its activity and that might impact it achieving its business objectives, as well as the sources of risk, understood as circumstances that, alone or in combination with others, might significantly impact the frequency or severity of particular risks; ii) governance in relation to risk management and control; and iii) the internal rules and regulations governing actions in this area in Bankinter Group.

### 1.4.1. Principles and culture of risk management and control

Bankinter Group conducts business in accordance with the principles and values established by the board of directors. These constitute its corporate risk culture, which include respect for, and compliance with, applicable rules and regulations, and effective and prudent management of all the risks that could arise in the course of the Group's business.

To this end, the Group has a risk management and control system that is considered appropriate for its business model, its organisation, the countries in which it operates and its corporate governance system. This is aligned at all times with the strategy defined by the corporate bodies of Bankinter. It fulfils the following purposes:



The risk management and control system is applied comprehensively throughout the Group and includes the following core elements:

## Governance

The System establishes a clear allocation of responsibilities, with well-defined lines and a corporate vision that ensures its consistent application in all companies and branches that make up the Group.

## Transparent, complete and reliable evaluation, monitoring and reporting that ensures:

- Identifying the material risks to which Bankinter is exposed.
- Monitoring the Group's risk profile and the identified risk factors.
- the evaluation of the impact of the materialisation of risk factors on the metrics defined in the Risk Appetite Framework (which is described below) based on different scenarios (including stress test scenarios).
- Dynamic management of unforeseen situations, with the adoption of appropriate corrective measures.

## Instruments for effective management and control of risks, both financial and non-financial, including tax risks

- General policies.
- Methodologies, models and technological and data governance systems.
- Well-sized organisational units.

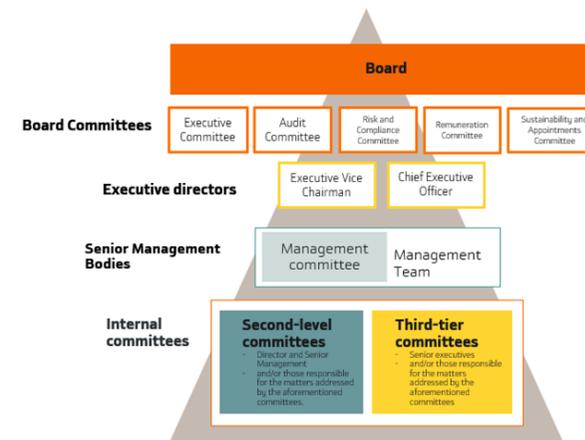
Information on the main financial and non-financial risks faced by Bankinter Group can be found in section 7 of Bankinter Group's 2025 annual corporate governance report, which is available on the corporate website.

## 1.4.2. Governance of the risk function

The risk management and control system at Bankinter Group is based on robust governance and the responsibility of its governing bodies, which are responsible for both establishing the risk strategy and for continuously monitoring and supervising its implementation.

### Corporate bodies

responsible for the definition and supervision of the Control and Risk Management system



Bankinter Group's board of directors has the non-delegable authority to establish a risk management and control framework that takes into account all risks, both financial and non-financial, including tax risks, that may arise and the regular monitoring of internal information and control systems.

The board of directors also approves and regularly reviews the risk appetite framework, which defines the risk appetite and tolerance that the entity is willing to assume in its activities. The framework contains a set of key metrics for the levels of the various risks, and the quality and recurrence of earnings, liquidity and capital adequacy. Target risk levels, tolerances and limits are defined for each of the metrics.

For the proper performance of these risk management and control functions, Bankinter's board of directors has established different committees that assist it in the performance of its functions. The [rules and regulations of the board of directors](#) of Bankinter are available on the company's website, together with the other documents regulating its internal bodies: The executive directors are responsible for exercising the powers delegated by the board of directors of Bankinter, performing management functions in the entity and, in particular, promoting risk management in accordance with the principles, policies, risk appetite statement and risk culture established by the board of directors.

The [2025 annual corporate governance report](#), which is available on Bankinter's corporate website, contains a detailed description of the composition of the board of directors and its committees, as well as of the members that comprise them, including their profile and professional experience, and their positions within and outside Bankinter Group. It also

describes the selection, succession, performance appraisal and other processes. Section 7 of the report describes the duties of the board and its committees in relation to risk management and control.

Senior management, defined in accordance with the provisions of [Bankinter Group's corporate governance policy](#), which is approved by the board of directors, makes decisions on risk matters through the corresponding internal committees in which its members participate, which are described below. Senior management is advised by the Corporate Control and Compliance division, which exercises the Group's risk management function, on decisions that impact the entity's risk strategy and risk appetite. The Corporate Control and Compliance division refers any decisions it considers could negatively affect the strategy or the risk appetite to the competent body.

Under [Bankinter Group's corporate governance policy](#), which is available on the corporate website, Bankinter can create the internal committees with management and monitoring duties that it considers necessary, taking into account the principles of efficiency and agility in internal operations, having at all times those required by applicable regulations.

These committees can be classified into the following categories: i) second-level committees, comprising a member of the board of directors and senior managers and/or officers responsible for the issues dealt with in the committee; and ii) third-level committees, comprising senior managers of the entity and those responsible for the issues the committees deal with. A full description of these committees can be found in section 7 of the [2025 annual corporate governance report](#).

The above system is supplemented by other internal bodies, of lower rank with functions for monitoring the different risks, which may develop technical procedures that complement the general policies and procedures approved by the corporate bodies described above.

### 1.4.3. Three lines of defence model

Risk management and control at Bankinter follows a model based on three lines of defence. The model is based on the independence and separation of functions between the various business units and risk management and control units. Bankinter not only adopts this model as a starting point, but also reinforces it on the basis of a solid and truly effective first line that gives greater independence and authority to the second line of defence to question decisions that affect the entity's risk exposure, not only in the area of financial risks but also non-financial risks. This provides the board of directors and senior management with a holistic view that allows them to understand and manage the entity's risk profile.

The three lines of defence model is described in [Note 44 to the 2025 consolidated financial statements](#) and section 7 of the [2025 annual corporate governance report](#).

## 1.5. Risk mitigation and hedging policies. Supervision strategies and processes

Prudence is the hallmark of Bankinter Group's lending policy: criteria for granting credit are based on the customer's verified solvency and capacity to make repayments, in line with a realistic payment plan and taking only ordinary customer income into consideration. Transaction guarantees are only considered a secondary method of recovery.

In many cases, mitigation of the credit risk is achieved through the contribution of guarantees by the borrower, with the acceptance of either collateral (essentially mortgage securities, money securities, pledged securities or other securities) or personal guarantees (both of the counterparty and guarantors that have a better credit rating).

For more details about risk mitigation and hedging policies, and the strategies and processes used to supervise the continued effectiveness of hedging and risk mitigation techniques, as required by article 435.1.d. of the CRR, please refer to the following points:

- 4.3.1. Counterparty credit risk management policy.
- 4.7. Information on credit risk mitigation techniques.
- 5.2 Characteristics of the market risk management system and models used.
- 6.1. Management of operational risk.
- 8. Structural interest rate and foreign exchange risk.
- 9. Liquidity and funding risk.

02

## Information on shareholders' equity



## 2. Information on shareholders' equity

Title I of Part Two of Regulation (EU) 575/2013 of the European Parliament and of the Council, modified by Regulation (EU) 2024/1623 (CRR3), defines the different levels of capital and the items that constitute the institution's own funds under the new solvency regulations. Regulation (EU) 2016/445 of the European Central Bank establishes the options and discretions that, in relation to the prudential requirements of credit institutions, are exercised by the Supervisor, specifying the timelines for gradual application for the counting of certain items as shareholders' equity.

### 2.1. Elements that constitute shareholders' equity

Under solvency regulations, the Group's Shareholders' Equity is the sum of tier 1 (T1) and tier 2 (T2) capital. In turn, tier 1 capital consists of common equity tier 1 (CET1) and additional tier 1 capital (AT1) capital.

Common equity tier 1 (CET1) is considered first-class quality capital for its loss absorption capacity. CET1 instrument holders are subordinated to the rest of bank creditors, including AT1 and T2 instrument holders.

Additional tier 1 capital (AT1) only has preference, in the order of precedence of payments in case of insolvency, over CET1 instrument holders, remaining subordinated to the rest of creditors of the Institution, including T2 instrument holders.

Lastly, tier 2 capital (T2) absorbs losses after instruments CET1 and T1, and it remains subordinated to the rest of bank creditors. Its loss absorption capacity is, therefore, lower.

#### Common equity tier 1

Bankinter's common equity tier 1 (CET1), as established in the regulation, consists of:

- The Bank's share capital.
- Share premiums associated with the share capital.
- Accumulated gains in accordance with Article 26.1.c) of Regulation (EU) 575/2013 (as modified by CRR3) available to the institution for unrestricted and immediate use to cover losses. It also includes the reserves of institutions accounted for by the equity method.
- Interim profit accumulated over the course of the financial year related to the prudent consolidation scope and net of the foreseeable dividends to distribute against the financial year's profit. These provisional profits accumulated during the year are verified quarterly by the statutory auditors. They are only included as common equity tier 1 after receiving authorisation for their inclusion from the supervisor.

- Other accumulated income, which basically reflects valuation adjustments associated with financial assets at fair value through other comprehensive income, from exchange rate differences and from institutions accounted for by the equity method, and other valuation adjustments.

The common equity tier 1 calculated in this manner must be adjusted by the following deductions:

- Intangible assets, with the exception of IT programmes that have been prudently valued and the value of which would not be impaired in the event of resolution or liquidation of the institution.
- Holdings of instruments eligible as common equity tier 1 that the institution or any Group institution holds directly, indirectly or synthetically, including those shares that the institution must acquire by virtue of any contractual commitment.
- The shortfall in provisions, if any, resulting from comparing the calculation of expected loss amounts for exposures for which minimum capital requirements are calculated using internal ratings-based (IRB) methodologies with the provisions associated with those exposures, and the shortfall in provisions, if any, resulting from insufficient supervisory coverage of non-performing exposures.
- The amount of shares held in financial sector institutions, including insurance companies, where the bank has a significant investment, which exceeds the threshold of 10% of CET1, in accordance with Article 48 of Regulation (EU) 575/2013.
- Additional valuation adjustments that arise from prudential valuation of positions accounted for at fair value, in accordance with Article 105 of Regulation (EU) 575/2013. For the calculation of AVAs, Bankinter uses the simplified approach set out in Regulation (EU) 101/2016 on the methodology for calculating additional valuation adjustments.
- Items that must be deducted from additional tier 1 capital elements that exceed the Institution's additional tier 1 capital.

#### Additional tier 1 capital

Bankinter's additional tier 1 capital (AT1), as established in the Regulation, consists of:

- Additional tier 1 capital instruments, which are perpetual, potentially convertible securities that have the characteristics set out in Article 52 of Regulation (EU) 575/2013. These instruments ranks below tier 2 capital instruments in case of insolvency.
- The value of these instruments is determined by their book value.

The characteristics of issues of potentially convertible securities forming part of additional tier 1 capital (AT1) at 31 December 2025 are detailed in the CCB template in Annex I.

Additional tier 1 capital must be adjusted by the following deductions:

- Direct, indirect and synthetic holdings of own AT1 instruments belonging to Group institutions, including the AT1 instruments that the institution may be forced to acquire as a result of current contractual commitments.
- Direct, indirect and synthetic holdings of own AT1 instruments in financial sector entities, with certain limitations when the institution maintains a significant investment in these entities.

### Tier 2 capital

Bankinter's tier 2 capital (T2), as established in the Regulation, consists of:

- Additional tier 2 capital instruments, which are subordinated obligations that have the characteristics set out in Article 63 of Regulation (EU) 575/2013. These instruments are ranked behind common creditors in case of insolvency.
- The value of these instruments is determined by their book value.

It should be taken into account that, according to the Regulation, issues of eligible tier 2 instruments with less than five years left until their maturity, start to lose their eligibility as tier 2 capital at an annual rate of 20%.

The characteristics of issues of subordinated bonds forming part of additional tier 2 capital at 31 December 2025 are detailed in the CCB template in Annex I.

Tier 2 capital calculated in this manner must be adjusted by the following deductions:

- Direct, indirect and synthetic holdings of own tier 2 instruments belonging to Group entities, including the tier 2 instruments that the institution may be forced to acquire as a result of current contractual commitments.
- Direct, indirect and synthetic holdings of own tier 2 instruments in financial sector entities, with certain limitations when the institution maintains a significant investment in these entities.

## 2.2. Amount of shareholders' equity

The breakdown and composition of Bankinter Group's shareholders' equity is as follows:

### Amount of eligible own funds

	Q4 25	Q4 24	Variation	Variation %
<b>Common equity tier 1: Instruments and reserves</b>	6,243,751	5,741,205	502,546	8.8%
Capital	269,660	269,660	–	0.0%
Retained earnings	544,988	476,486	68,502	14.4%
Reserves and others	5,429,103	4,995,060	434,043	8.7%
<b>Common equity tier 1: regulatory adjustments</b>	-462,320	-468,968	6,648	-1.4%
<b>Common equity tier 1 (CET1)</b>	<b>5,781,430</b>	<b>5,272,237</b>	<b>509,194</b>	<b>9.7%</b>
Additional tier 1 capital: instruments	798,741	655,396	143,345	21.9%
Additional tier 1 capital: regulatory adjustments				
Tier 1 capital (CET1 + AT1)	6,580,172	5,927,633	652,539	11.0%
Tier 2 capital: instruments	1,281,781	982,324	299,457	30.5%
Tier 2 capital: regulatory adjustments				
Tier 2 capital	1,281,781	982,324	299,457	30.5%
<b>Total capital (tier 1 capital + tier 2 capital)</b>	<b>7,861,953</b>	<b>6,909,957</b>	<b>951,996</b>	<b>13.8%</b>
Subordinated MREL	9,913,325	8,954,131	959,194	10.7%
<b>Total MREL</b>	<b>11,668,210</b>	<b>10,211,541</b>	<b>1,456,669</b>	<b>14.3%</b>
Risk-weighted assets	45,453,891	42,475,608	2,978,283	7.01%
CET1 (%)	12.72%	12.41%	0.31%	2.47%
Tier 1 (%)	14.48%	13.96%	0.52%	3.73%
Tier 2 (%)	2.82%	2.31%	0.51%	21.93%
Total capital (%)	17.30%	16.27%	1.03%	6.32%
Subordinated MREL (% TREA)	21.81%	21.08%	0.73%	3.46%
Total MREL (% TREA)	25.67%	24.04%	1.63%	6.78%
Leverage ratio exposure	125,191,297	117,926,113	7,265,184	6.2%
<b>Leverage ratio</b>	<b>5.26%</b>	<b>5.03%</b>	<b>0.23%</b>	<b>4.57%</b>

Figures in thousands of euros

The increase in common equity tier 1 (CET1) in 2025 was mainly due to the retention of part of the ordinary profit for the year, after application of the 50% payout.

Additional tier 1 capital (AT1) stood at 798,741 thousand euros at 31 December 2025. During 2025, an issuance with a nominal value of 500 million euros was made to refinance an AT1 issue with a nominal value of 350 million euros that was redeemed in January 2026 but which ceased to be included in capital at the time of issue of the replacement, expanding the volume of AT1 eligible as capital, resulting in an increase of 143 thousand euros.

The change in tier 2 capital instruments is explained by an issuance with nominal value of 300 million in 2025.

Risk-weighted assets increased in 2025 due to the performance of the Group's ordinary business, which parallels the increase in lending.

The application of CRR3 had the following main impacts:

- The credit risk requirements for the loan book related to the customer business were reduced by the lower requirement applicable to the corporate book under the foundation IRB approach where, in general, the applicable regulatory LGD is down from 45% to 40%.
- In the Group's ALCO portfolio, RWAs for credit risk increased due to the review of the capital requirements for subordinated debt instruments under CRR3, which are now weighted at 150%.
- The new model of capital requirements for operational risk penalises the size of loan books, with high impact on commercial retail banking models.
- The Group was not impacted by application of the output floor for risk-weighted assets under CRR3.

The reconciliation between shareholders' equity reported in the public financial statements and the regulatory capital is presented below for capital adequacy purposes:

#### Reconciliation between accounting own funds and regulatory capital

Eligible amounts	2025	2024
Paid up capital	269,660	269,660
Share premium	–	–
Reserves	5,469,969	5,034,464
Other items of equity	24,146	18,193
Own shares	-2,285	-1,437
Attributed earnings	1,089,976	952,971
Interim dividends	-405,755	-365,524
<b>Total shareholders' equity (public balance sheet)</b>	<b>6,445,711</b>	<b>5,908,327</b>
Other accumulated comprehensive income	-34,227	-30,663
<b>Total equity (public balance sheet)</b>	<b>6,411,483</b>	<b>5,877,665</b>
Eligible preferred stock	798,741	655,396
Other valuation adjustments	-7,673	-5,379
Intangible assets	-209,705	-187,453
Shortfall of prudential provisions and of IRB portfolios	-242,247	-255,676
Deferred tax assets	-2,694	-20,460
Investments in financial institutions	–	–
Other adjustments*	-167,733	-136,460
<b>Tier 1</b>	<b>6,580,172</b>	<b>5,927,633</b>

(\*) Includes the difference between accounting profit and retained earnings for capital, employee financing and cash flow hedges (hedging derivatives)

Figures in thousands of euros

CRR3 establishes a number of provisions that allow transitory application of a series of new requirements. Of these, Bankinter has only made use of the transitional application provided for in article 495 quinquies for unconditionally cancellable commitments, which permits the requirement of 10% of the conversion factor for this type of exposure to be deferred until 2033. Not using this transitional provision on the CET1 ratio would have resulted in a reduction of 19 basis points at the end of 2025. This impact is variable over time and its continued management will make it possible to reduce its impact over time.

### 2.3. Capital buffers

The framework applicable to European credit institutions comprises European Directive 2013/36/EC of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and prudential supervision (CRD IV), as amended by European Directive 2024/1619 of the European Parliament and of the Council (CRD VI), together with Directive 2013/575/EC of the European Parliament and of the Council (CRR), as amended by Directive 2024/1623/EC of the European Parliament and of the Council (CRR 3). The contents of this Directive were incorporated into Spanish law through Act 10/2014 of 26 June on the regulation, supervision and capital adequacy of banks. This includes the establishment of additional capital buffers above the minimum regulatory requirements under Regulation (EU) 575/2013 (CRR).

In addition to the minimum capital requirements, a total of five capital buffers are also established:

- **Capital Conservation Buffer:** the objective of this buffer is to ensure that the institutions have capital in a sufficient amount and quality to absorb losses in a stressed economic environment and keep it above minimum requirements. To attain this objective, the capital buffer must be made up of common equity tier 1 (CET1).
- **Countercyclical Capital Buffer:** this is not a permanent buffer. Instead, it shall be required only in moments in which credit activity is growing excessively in a certain jurisdiction. Its purpose is to act as a brake on this excessive growth and alleviate the possible consequences of economic bubbles. In periods of normal credit growth, this buffer is zero.
- **Systemic Risk Buffer:** its purpose is to prevent or avoid systemic risks or countercyclical macroprudential risks in the long term. These are risks that can cause a disturbance in the financial system with serious negative consequences for both the system and the real economy.
- **Global Systemically Important Institutions Buffer:** it is established for institutions that constitute a systemic risk due to their size, degree of interconnection with the rest of institutions or non-existence of substitute services and activities, as their failure can affect the financial system as a whole.
- **Other Systemically Important Institutions Buffer:** this buffer is established for institutions whose demise can affect the financial system, albeit to a lesser extent than the aforementioned, and therefore, it has fewer requirements.

Two of the buffers included in the act are not discretionary: the capital conservation buffer and the global systematically important institutions buffer, which are in place in all jurisdictions of the European Union. The Bank of Spain has discretion to set a buffer for other systemically important entities, and the macro-prudential authorities of the jurisdictions in which the Group operates have discretion to set countercyclical capital conservation buffers and buffers against systemic risks.

The capital conservation buffer was phased in from 2016 to 2019, at an annual rate of 0.625%, until it reached 2.5%. From 2020 until the year-end date of 2025, the required level of this capital buffer has remained at 2.5%.

The application of buffers for global systemically important institutions and other systemically important institutions are not applicable to Bankinter; therefore, there are no additional requirements for these items.

The Central Bank of Ireland maintains a countercyclical buffer of 1.5%, which must be maintained in the form of common equity tier 1 capital on exposures in Ireland. As of 31 December 2025, the impact on the minimum common tier 1 capital requirement was 8 basis points.

In 2024, the Bank of Portugal activated a systemic risk buffer requirement equivalent to 4% of the risk-weighted assets held in residential mortgages in Portugal whose capital requirements are determined based on advanced models. This requirement must be maintained in terms of common equity tier 1 capital. The impact on the minimum common equity tier 1 capital requirement was 15 basis points at 31 December 2025.

The Bank of Spain has established a new countercyclical buffer requirement of 0.50% of risk-weighted assets in 2025, which will increase to 1% by the end of 2026. The impact on the minimum ordinary Tier 1 capital requirement at the end of December 2025 was 41 basis points, and the estimate for the end of 2026 is 81 basis points. The latter is the estimated future impact based on the Group's exposure in Spain at 31 December 2025.

The Bank of Portugal has established a new countercyclical buffer requirement in 2026 of 0.75% of common equity tier 1 capital for exposures in Portugal. As of 31 December 2025, this countercyclical buffer had not been required, as the additional impact of the minimum common equity tier 1 requirement will be required in 2026. This has been estimated at 10 basis points.

The Entity maintains active management of capital that ensures compliance with minimum requirements and anticipates any phased-in implementation of buffers or increases in requirements to due to changes brought about by market cycles.

At 31 December 2025, the bank's credit risk exposures that are considered in calculating the countercyclical capital buffer were as follows, broken down by country.

### Geographical distribution of credit risk exposures relevant for the calculation of the countercyclical capital buffer (CCyB1)

10 Breakdown by country	a	b	c	d	e	f	g	h	i	j	k	l	m
	General credit risk exposures		Trading book exposures		Securitisation exposures	Total value of exposures	Own funds requirements			Total	Risk-weighted exposures	Weightings of shareholders' equity requirements	Countercyclical capital buffer percentage
Value of exposure according to standardised approach	Value of exposure according to IRB method	Sum of long and short positions in the trading book	Value of trading book exposure under internal approaches	Relevant credit risk exposures – Credit risk			Relevant credit risk exposures – Market risk	Relevant credit risk exposures – Securitisation positions in the banking book					
Spain	18,444,515	46,334,679	3,958,900	–	146,260	68,884,354	2,371,275	28,487	4,678	2,404,440	30,055,502	81.04 %	0.50 %
Portugal	4,590,282	6,617,697	–	–	–	11,207,978	412,931	–	–	412,931	5,161,643	13.92 %	0.00 %
Ireland	4,851,744	–	–	–	–	4,851,744	149,546	–	–	149,546	1,869,324	5.04 %	1.50 %
<b>20 Total</b>	<b>27,886,540</b>	<b>52,952,376</b>	<b>3,958,900</b>	<b>0</b>	<b>146,260</b>	<b>84,944,076</b>	<b>2,933,752</b>	<b>28,487</b>	<b>4,678</b>	<b>2,966,917</b>	<b>37,086,468</b>	<b>100 %</b>	

Figures in thousands of euros

When calculating the countercyclical capital buffer, all categories other than those referred to in points (a) to (f) of Article 112 of the CRR are included. Therefore, exposures to central and regional governments, public sector entities, multilateral development banks, international organisations and institutions are not taken into account.

Following the instructions of Regulation (EU) 2024/3172, exposures to other countries representing less than 2% of the aggregate total risk-weighted exposure amounts have been included in Spain.

At the end of the 2025 reporting period, the Group had the following impact on the common equity tier 1 requirement due to the countercyclical buffers in Spain and Ireland:

#### Amount of the specific countercyclical capital cushion for each bank (CCyB2)

	a
1 Total amount of risk-weighted exposure	45,453,891
2 Percentage of the bank's specific countercyclical capital buffer	0.48 %
3 Countercyclical capital buffer requirement of each bank	218,549

Figures in thousands of euros

At the end of 2025, the Group is subject to the following impact on its common equity tier 1 (CET1) capital requirement, stemming from Portugal's 4% systemic risk buffer applied to mortgage exposures within the retail portfolio under the advanced method:

#### Amount of Portugal's systemic risk buffer

1 Risk-weighted exposure amount using the advanced method, maintained in residential mortgages in Portugal	1,655,071
2 Systemic risk percentage in Portugal	4.00 %
3 Portugal's systemic risk buffer requirement	66,203

Figures in thousands of euros

Portugal's systemic buffer requirement in the table above represents 15 basis points of the Group's CET1 ratio.

## 2.4 MREL and TLAC

In the context of the Bank Recovery and Resolution Directive ("BRRD"), banking institutions are required to comply with two minimum requirements for Shareholders' Equity and Eligible Liabilities ("MREL requirement"): one based on the total of such instruments ("total MREL") and the other on subordinated instruments ("subordinated MREL"). These MREL requirements are determined by the Single Resolution Board ("SRB").

The BRRD2 came into force in December 2020, establishing 1 January 2024 as the deadline for compliance with the MREL requirements, with an intermediate requirement of 1 January 2022. This regulation also established that the Total and Subordinated MREL requirements must be expressed as a percentage of both the TREA (Total Risk Exposure Amount) and the leverage ratio.

Regulation (EU) 2019/877 amending Regulation (EU) No 806/2014 refers to the loss-absorbing and recapitalisation capacity of credit institutions and investment firms. The aim of the regulation is to ensure the rapid and orderly reabsorption of losses and recapitalisation in resolution processes, with minimum impact on taxpayers and financial stability. Entities must therefore meet a minimum requirement for shareholder's equity and eligible liabilities (MREL) determined for each entity pursuant to the provisions of Regulation (EU) 806/2014.

On 17 December 2024, the Single Resolution Board (SRB) determined that Bankinter would have to comply, at a consolidated level, with a total binding MREL requirement of 20.31% of its total risk exposure (TREA) and 6.39% of its leverage ratio exposure (LRE).

The Bank must also meet an additional subordinated MREL (to be covered solely by shareholder's equity and eligible subordinate liabilities) equivalent to 15.80% of the TREA and 6.39% of the LRE.

At 31 December 2025, Bankinter met the above requirements, with its level of MREL at 25.67% and its level of subordinate MREL at 21.81%.

On 15 January, the SRB determined that Bankinter would have to comply, at a consolidated level, with a total binding MREL requirement of 20.24% of total risk exposure and 6.52% of exposure to leverage ratio. The SRB notification also established that subordinated instruments must be used to comply with the MREL for an amount equivalent to 15.38% of TREA and 6.52% of LRE.

The MREL requirements set forth are in line with Bankinter's forecasts and are comfortably met, both in terms of percentage TREA and percentage LRE. The long-term financing plan also provides for continued comfortable meeting of future requirements.

## Key indicators MREL (KM2)

		Minimum requirement for equity and eligible liabilities (MREL)
<b>Equity and eligible liabilities, ratios and components</b>		
1	Own funds and eligible liabilities:	11,668,210
EU-1a	Of which: own funds and subordinated liabilities	9,913,325
2	Total risk exposure amount of the resolution group	45,453,891
3	Equity and eligible liabilities as a percentage of total risk exposure amount	25.67 %
EU-3a	Of which: own funds and subordinated liabilities	21.81 %
4	Total exposure measurement	125,191,297
5	Shareholders' equity and eligible debt as a percentage of total exposure	9.32 %
EU-5a	Of which: own funds and subordinated liabilities	7.92 %
6a	Does the exemption from subordination provided for in Article 72 b, paragraph 4, of Regulation (EU) no. 575/2013 apply? (5% exemption)	
6b	Aggregate amount of non-subordinated eligible liability instruments permitted if the subordination faculties set out in Article 72 b, paragraph 3, of Regulation (EU) no. 575/2013 are applied (maximum exemption of 3.5%)	
6c	If a limited subordination exemption is applied in accordance with Article 72 b, paragraph 3, of Regulation (EU) no. 575/2013, the financing amount with the same ranking as the excluded liabilities and recognised in row 1, divided by the financing amount with the same ranking as the excluded liabilities that would be recognised in row 1 if no limit were applied (%)	
<b>Minimum requirements for shareholder's equity and eligible liabilities</b>		
EU-7	Financial liabilities held for trading	20.31 %
EU-8	Financial liabilities designated at fair value through profit or loss	15.80 %
EU-9	Financial liabilities at amortised cost	6.39 %
EU-10	Fair value changes of the hedged items in portfolio hedge of interest rate risk	6.39 %

Figures in thousands of  
euros

## Capacity and composition - MREL (TLAC1)

		Minimum requirement for equity and eligible liabilities (MREL)
<b>Shareholders' equity and admissible liabilities and adjustments</b>		
1	Common equity tier 1	5,781,431
2	Additional Tier 1 Capital	798,741
6	Tier 2 capital	1,281,781
11	Own funds for the purposes of Article 92a of Regulation (EU) No 575/2013 and Article 45 of Directive 2014/59/EU	7,861,953
<b>Own funds and eligible liabilities: non-regulatory capital elements</b>		
12	Eligible liability instruments issued directly by the resolution bank (to which the preceding provisions do not apply)	2,000,000
EU-12a	Eligible liability instruments issued by other companies belonging to the resolution group (to which the preceding provisions do not apply)	–
EU-12b	Admissible liability instruments that are subordinated to excluded liabilities issued before 27 June 2019 (subordinated to which the preceding provisions apply)	–
EU-12c	Tier 2 capital instruments with a maturity of at least one year, to the extent that they are not considered tier 2 capital items	51,372
13	Eligible liabilities that are not subordinated to excluded liabilities (to which the seniority provisions do not apply, before the limit)	1,754,885
EU-13a	Eligible liabilities not subordinated to excluded liabilities issued before June 27, 2019 (before the limit)	–
14	Amount of eligible non-subordinated liability instruments, where applicable after application of Article 72 b, paragraph 3, of the CRR	–
17	Eligible liability items before adjustments	3,806,257
EU-17a	Of which: subordinated liability items	2,051,372
<b>Own funds and eligible liabilities: adjustments to non-statutory capital items</b>		
18	Shareholders' equity and eligible liability items before adjustments	11,668,210
19	(Deduction of exposures between multiple resolution groups)	
20	(Deduction of investments in other eligible liabilities instruments)	
22	Shareholders' equity and eligible liabilities after adjustments	11,668,210
EU-22a	Of which: own funds and subordinated liabilities	9,913,325
<b>Amount of risk-weighted exposure and calculation of the leverage ratio exposure of the resolution group</b>		
23	Total amount of risk-weighted exposure	45,453,891
24	Total exposure measurement	125,191,297
<b>Ratio of shareholders' equity and eligible liabilities</b>		
25	Equity and eligible liabilities as a percentage of total risk exposure amount	25.67 %
EU-25a	Of which: own funds and subordinated liabilities	21.81 %
26	Shareholders' equity and eligible debt as a percentage of total exposure	9.32 %
EU-26a	Of which: own funds and subordinated liabilities	7.92 %

27	Common equity tier 1 capital (as a percentage of total risk exposure amount) available after meeting resolution group requirements	8.22 %
28	Combined buffer requirement (%) (0410)	
29	Of which: capital conservation buffer requirement	
30	Of which: countercyclical capital buffer requirement	
31	Of which: systemic risk buffer requirement	
EU-31a	Of which: buffer for global systemically important institutions (G-SII) or other systemically important entities (O-SII)	
Memorandum items		
EU-32	Total amount of excluded liabilities referred to in Article 72a(2) of Regulation (EU) No 575/2013	

Figures in thousands of euros

Note: The empty fields for the EU have been hidden in the table and are therefore not applicable.

## Order of priority of creditors - resolution authority (TLAC3b)

		Order of priority in case of insolvency														Sum from 1 to n
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	
1	Description of the rank in case of insolvency	CET1	AT1	T2	Intragroup	Fines and penalties	Interest	Rest of debt that is contractually subordinated other than AT1 and T2	Ordinary nonpreferred credits	Ordinary credits	Deposits with general privilege NOT secured	Deposits with general privilege covered by the FGD	Loans with general privilege	Loans with special privilege	Credits against the bankruptcy estate	
5	Own funds and liabilities potentially eligible to meet the MREL	5,781,431	798,741	1,281,781	–	–	–	51,372	2,000,000	1,754,885	–	–	–	–	–	11,668,210
6	Of which: residual maturity >= 1 year and < 2 years	–	–	–	–	–	–	–	750,000	189	–	–	–	–	–	750,189
7	Of which: residual maturity >= 2 years and < 5 years	–	–	50,249	–	–	–	31,645	–	502,852	–	–	–	–	–	584,746
8	Of which: residual maturity >= 5 years and < 10 years	–	–	1,231,532	–	–	–	18,468	1,250,000	1,251,844	–	–	–	–	–	3,751,844
9	Of which: residual maturity >= 10 years, excluding perpetual securities	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
10	Of which: perpetual securities	5,781,431	798,741	–	–	–	–	1,259	–	–	–	–	–	–	–	6,581,431

Figures in thousands of euros

Note: The empty fields for the EU have been hidden in the table and are therefore not applicable.

## 03

Information on  
key indicators and  
shareholders'  
equity  
requirements



### 3. Information on key indicators and shareholders' equity requirements

Title II of Part Two of Regulation (EU) 575/2013 of the European Parliament and of the Council, modified by Regulation (EU) 2024/1623, defines the credit risk capital requirements; Title III refers to the requirements of own funds for operational risk; and Title IV refers to the requirements of own funds for market risk. The following titles specify the own funds requirements for settlement risk and for credit valuation adjustment risk.

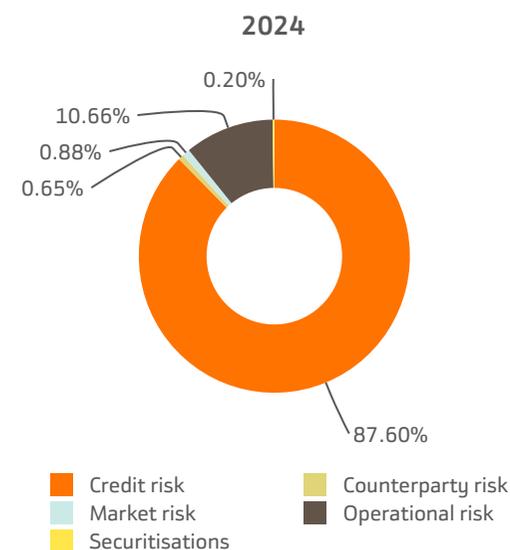
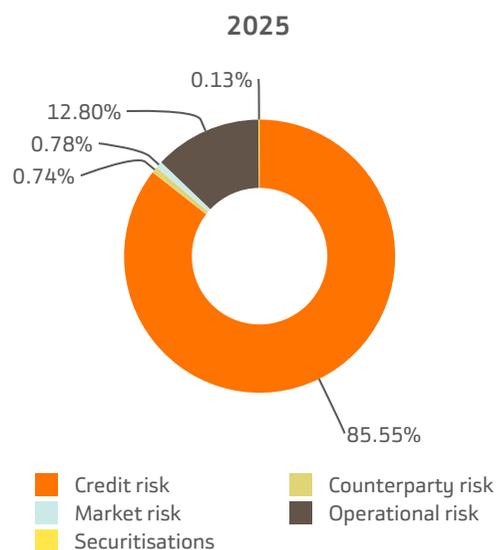
#### 3.1. Breakdown of risk-weighted exposure

The total risk-weighted exposure, broken down by credit risk, market risk and operational risk at 31 December 2025 and 2024 is presented below.

Credit risk-weighted assets include positions in securitisations, equity positions that are not recorded in the trading book, holdings in financial institutions in which there is a significant and non-significant interests below the 10% CET1 threshold and deferred tax assets that do not rely on future profitability.

The following tables show a breakdown of risk-weighted exposures by type of risk:

##### Breakdown of risk-weighted assets by risk type



## Presentation of RWA (OV1)

	Total amount of risk exposure		Total shareholders' equity requirements
	a	b	c
	Q4 25	Q3 25	Q4 25
<b>1</b>	<b>Credit risk (excluding counterparty credit risk)</b>		
	<b>38,884,348</b>	<b>36,952,717</b>	<b>3,110,748</b>
2	Of which: standardised approach (SA)	20,067,269	18,791,870
3	Of which: foundation internal ratings based (FIRB) approach	10,501,467	9,833,817
4	Of which: slotting approach (SLO)	515,381	513,051
EU 4a	Of which: equities under the simple risk weighting approach		41,230
5	Of which: internal ratings based (IRB) approach	7,111,306	7,075,116
<b>6</b>	<b>Counterparty credit risk</b>		
	<b>227,375</b>	<b>250,218</b>	<b>18,190</b>
7	Of which: standardised approach	188,412	213,675
8	Of which: under the internal model method (IMM)		15,073
EU 8a	Of which: exposures to a central counterpart	14,869	9,536
9	Of which: other counterparty risk	24,094	27,007
<b>10</b>	<b>Credit valuation adjustment (CVA)</b>		
	<b>110,683</b>	<b>100,216</b>	<b>8,855</b>
EU 10a	Of which: standardised approach (SA)		
EU 10b	Of which: basic approach (F-BA and R-BA)	110,683	100,216
EU 10c	Of which: simplified approach		8,855
<b>15</b>	<b>Settlement risk</b>		
<b>16</b>	<b>Securitisation exposures in loans and receivables (after application of the cap)</b>		
	<b>58,477</b>	<b>58,910</b>	<b>4,678</b>
17	Of which: SEC-IRBA approach	58,477	58,910
18	Of which: SEC-ERBA approach (including the internal assessment approach)		4,678
19	Of which: with the SEC-SA approach		
EU 19a	Of which: 1250%		
<b>20</b>	<b>Position, exchange rate and commodity risks (market risk) (1)</b>		
	<b>356,089</b>	<b>421,695</b>	<b>28,487</b>
21	Of which: with the alternative standardised approach (A-SA) (2)		
EU 21a	Of which: with the simplified standardised approach (S-SA) (2)		
22	Of which: with the internal model method (IMM) (2)		
<b>EU 22a</b>	<b>Large exposures</b>		
23	Reclassifications between the trading and non-trading books		
<b>24</b>	<b>Operational risk</b>		
	<b>5,816,919</b>	<b>5,366,371</b>	<b>465,354</b>
EU 24a	Exposures to crypto assets		
25	Amounts below the thresholds for deduction (subject to 250% risk weight). Data for information (3)	1,206,573	1,313,050
<b>26</b>	<b>Output floor applied (%)</b>		
<b>27</b>	<b>Adjustment due to the "floor" (before applying the transitional limit)</b>		
<b>28</b>	<b>Adjustment due to the "floor" (after applying the transitional limit)</b>		
<b>29</b>	<b>Total</b>		
	<b>45,453,891</b>	<b>43,150,127</b>	<b>3,636,311</b>

Figures in thousands of euros

Notes:

(1) The exposure and own funds for market risk requirements are shown according to the requirement prevailing at the end of the reporting period: the standardised approach under CRR2.

(2) Not reported as the FRTB was not in force to at the end of the reporting period.

(3) These amounts are also included in credit risk under the standardised approach (SA) (row 2).

## Key metrics template (KM1)

		a	b	c	d	e
		Q4 25	Q3 25	Q2 25	Q1 25	Q4 24
Available shareholders' equity						
1	Common equity tier 1	5,781,431	5,583,115	5,528,295	5,367,588	5,272,237
2	Tier 1 capital	6,580,172	6,381,598	6,326,561	6,023,079	5,927,633
3	Total capital	7,861,953	7,672,571	7,615,368	7,010,564	6,909,957
Amount of risk-weighted exposure						
4	Total amount of risk-weighted exposure	45,453,891	43,150,127	43,965,315	43,459,937	42,475,608
4a	Total amount of risk exposure before the floor	45,453,891	43,150,127	43,965,315	43,459,937	
Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common equity tier 1 ratios (%)	12.72%	12.94%	12.57%	12.35%	12.41%
5b	Common equity tier 1 ratio considering RWAs without floor (%)	12.72%	12.94%	12.57%	12.35%	
6	Equity tier 1 ratio (%)	14.48%	14.79%	14.39%	13.86%	13.96%
6b	Tier capital 1 ratio considering RWAs without floor (%)	14.48%	14.79%	14.39%	13.86%	
7	Total capital ratio (%)	17.30%	17.78%	17.32%	16.13%	16.27%
7b	Total capital ratio considering RWAs without floor (%)	17.30%	17.78%	17.32%	16.13%	
Additional own funds requirements for risks other than the risk of excessive leverage (as a percentage of the risk-weighted exposure amount)						
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	1.30%	1.30%	1.30%	1.30%	1.39%
EU 7e	Of which: composed of common equity tier 1 (percentage points)	0.73%	0.73%	0.73%	0.73%	0.78%
EU 7f	Of which: composed of common equity tier 1 (percentage points)	0.98%	0.98%	0.98%	0.98%	1.04%
EU 7g	Total SREP shareholders' equity requirements (%)	9.30%	9.30%	9.30%	9.30%	9.39%
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)						
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk observed in a Member State (%)	0.00%	0.00%	0.00%	0.00%	0.00%
9	Institution-specific countercyclical capital buffer (%)	0.48%	0.07%	0.06%	0.06%	0.08%
EU 9a	Systemic risk buffer (%)	0.15%	0.15%	0.15%	0.14%	0.15%
10.	Global systemically important entities buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 10a	Other systemically important entities buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
11	Combined buffer requirement	3.13%	2.72%	2.71%	2.70%	2.73%
EU 11a	Overall capital requirement (%)	12.43%	12.02%	12.01%	12.00%	12.12%
12	Common equity tier 1 capital available after meeting the total of the SREP's shareholders' equity requirements (%)	7.49%	7.71%	7.34%	6.83%	6.88%
Leverage ratio						
13	Total exposure measurement	125,191,297.00	123,670,358.00	123,997,403.00	118,856,823.00	117,926,113.00
14	Leverage ratio (%)	5.26%	5.16%	5.10%	5.07%	5.03%
Additional shareholders' equity requirements to address the risk of excessive leverage (as a percentage of total exposure measure)						
EU 14a	Additional shareholders' equity requirements to address the risk of excessive leverage (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14b	Of which: composed of CET1 (percentage points)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of the total exposure measure)						
EU 14d	Required leverage ratio buffer requirement (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14e	Overall leverage ratio requirement (%)	3%	3%	3%	3%	3%

Liquidity coverage ratio						
15	Total high quality liquid assets (HQLA) (value-weighted, average)	24,957,278	23,121,376	21,057,979	18,767,291	17,663,546
EU 16a	Cash outflows – Total weighted value	18,151,635	17,130,345	16,355,057	15,964,295	14,928,981
EU 16b	Cash inflows – Total weighted value	5,438,510	5,572,807	5,470,986	5,562,797	5,522,510
16	Total net cash outflows (adjusted value)	12,713,125	11,557,539	10,884,071	10,401,498	9,406,471
17	Liquidity coverage ratio (%) (1)	197.36%	199.40%	193.00%	180.02%	188.38%
Net stable funding ratio						
18	Total stable funding available	85,521,177	85,406,005	84,961,389	80,709,545	77,926,217
19	Total stable funding total required	55,918,724	56,368,122	57,337,526	55,508,837	54,600,823
20	Net stable funding ratio (%)	152.94%	151.51%	148.18%	145.40%	142.72%

Figures in thousands of euros

(1) Average of the consolidated LCR ratios

### 3.2. Output floor

Tables CMS1 and CMS2 below detail the amount of risk-weighted assets under the standardised approach and internal approaches by risk type (table CMS1) and by risk type at the asset level (CMS2) at 31 December 2025, as required under Regulation (EU) 2024/3172 and CRR3. The amount of the output floor applicable to Bankinter is equivalent to multiplying the base of RWAs for the output floor by the percentage applicable to it in each year. At 31 December 2025, the applicable percentage was 50%. It will be 72.50% at the end of the transitional period. Bankinter does not have additional RWA requirements due to the consideration of the output floor at either the close of 2025 or following application of the percentage at the end of the transitional period.

#### Comparison of risk-weighted exposure amounts under standardised approaches and approaches based on risk-level models (CMS1)

	a	b	c	d	EU d
	RWAs under modelled approaches for which the entity has supervisory approval	RWAs for portfolios that use the standardised approach	Total RWA (a+b)	RWA calculated using only the standardised approach	RWA base for the output floor
1 Credit risk (excluding counterparty risk)	18,817,079	20,067,269	38,884,348	53,002,702	45,693,619
2 Counterparty risk	–	227,375	227,375	227,375	227,375
3 Credit valuation adjustment (CVA)	–	110,683	110,683	110,683	110,683
4 Securitisation exposure in the non-trading book	–	58,477	58,477	140,813	140,813
5 Market risk (1)	–	356,089	356,089	356,089	783,304
6 Operational risk	–	5,816,919	5,816,919	5,816,919	5,816,919
7 Other risk-weighted exposures	–	–	–	–	–
<b>8 Total</b>	<b>18,817,079</b>	<b>26,636,812</b>	<b>45,453,891</b>	<b>59,654,582</b>	<b>52,772,714</b>

Figures in millions of euros

(1) The exposure and own funds for market risk requirements are shown according to the requirement prevailing at the end of the reporting period: the standardised approach under CRR2.

## Comparison of risk-weighted exposure amounts under standardised approaches and approaches based on credit risk models at the asset level (CMS2)

		a	b	c	d	EU d
		RWAs under modelled approaches for which the entity has supervisory approval	RWAs for portfolios that use the standardised approach	Total RWA	RWA calculated using only the standardised approach	RWA base for the output floor
1	Central government or central banks	–	–	101,215	101,215	101,215
EU 1a	Regional government or local authorities	–	–	6,594	6,594	6,594
EU 1b	Public sector entities	–	–	–	–	–
EU 1c	Categorised as multilateral development banks in the standardised approach	–	–	–	–	–
EU 1d	Categorised as international organisations in the standardised approach	–	–	–	–	–
2	Institutions	–	–	1,545,367	1,545,367	1,545,367
3	Equity exposures	–	–	63,774	63,774	63,774
4	Not applicable	–	–	–	–	–
5	Corporates	11,650,113	13,197,176	17,102,956	25,959,101	18,650,018
5.1	Of which: FIRB applied	11,016,849	12,311,355	11,016,849	12,311,355	12,311,355
5.2	Of which: AIRB applied	633,264	379,441	633,264	379,441	379,441
EU 5a	Of which: companies - general	9,587,742	12,690,796	12,859,446	19,999,878	12,690,796
EU 5b	Of which: companies - specialised lending	515,381	506,380	515,381	506,380	506,380
EU 5c	Of which: companies - acquired receivables	1,546,990	1,590,810	1,818,933	1,590,810	1,590,810
6	Retail exposures	6,478,042	2,032,759	11,602,030	7,156,747	7,156,747
6.1	Of which: eligible renewables	–	–	–	–	–
EU 6.1a	Of which: acquired receivables	63,646	70,554	440,286	70,554	70,554
EU 6.1b	Of which: other	1,932,406	1,962,205	5,903,875	3,971,470	1,962,205
6.2	Of which: secured by real estate property	4,481,991	–	4,481,991	7,735,507	7,735,507
EU 7a	Of which: categorised as secured by mortgages on real estate and ADCs under the standardised approach	–	9,129,520	4,294,793	9,129,520	9,129,520
EU 7b	Collective investment undertakings	–	–	687,652	687,652	687,652
EU 7c	Categorised as exposures in default under the standardised approach	–	577,971	348,393	926,364	926,364
EU 7d	Categorised as subordinated debt exposures under the standardised approach	–	–	1,029,494	–	–
EU 7e	Categorised as covered bonds under the standardised approach	–	–	–	–	–
EU 7f	Categorised as exposures to entities and companies with short-term credit assessment under the standardised approach	–	–	–	–	–
8	Other	688,925	688,925	2,102,081	2,102,081	2,102,081
9	<b>Total</b>	<b>18,817,079</b>	<b>25,626,350</b>	<b>38,884,348</b>	<b>47,678,415</b>	<b>40,369,333</b>

Figures in millions of euros

### 3.3. Description of the internal capital adequacy assessment process

One of the requirements established in Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 (CRD IV) (modified by European Directive 2024/1619/EU (CRD VI) of the European Parliament and of the Council of 20 May 2019), on access to the activity of credit institutions and their prudential supervision, is that the institutions must conduct, at least annually, an internal capital adequacy assessment process following the guidelines established in that Directive. Bankinter conducts its internal capital adequacy assessment process following the guidelines set by supervisors and regulators.

Within the capital self-assessment process, the Group evaluates the following aspects:

- **Risk profile of the Group:** an assessment is made of the inherent and residual risk of the risks to which the Group is exposed. An internal quantitative and qualitative assessment is carried out of credit, market, operational and liquidity risks, and of the amount of capital necessary to cover such risks.
- **Risk governance, management and control systems:** the process assesses both the Bank's corporate governance system and procedures, as well as the management and control processes for each of the relevant risks and their suitability for the Group's risk profile.

The European Banking Authority 'Guidelines on Internal Governance' are employed in the assessment of the corporate governance system. The Institution's risk culture, its reflection in the organisation of the function, its policies and procedures in terms of risks, and the procedures related to internal control and audit are assessed in the review of risk management and control.

- **Risk measurement and quantification of internal capital:** internal approaches are used to quantify the capital requirements for Pillar 2 risks to which the Group is exposed. Capital adequacy is therefore assessed beyond the traditional regulatory risks (credit, market and operational risks) by considering, among others, structural interest rate risks, concentration risks, reputational risks, business risks and climate risks.
- **Own funds target:** this is set in terms of common equity tier 1 (CET1) and total capital, and is compared to existing levels of capital. These targets are set by the board of directors, and it monitors them periodically.
- **Capital planning:** the Group's capital plan is summarised and assessed in the medium term, including the actions established in the strategic and business plans, and the capitalisation and dividend policies. The capital plan is subjected to stress scenarios to assess the resilience of the bank's capital level in adverse situations.
- **Capital contingency planning:** the potential sources of capital generation available to the Group in the event of a potential deterioration in its capital position are described and assessed. This analysis provides the governing bodies with an overview of the potential strategies available and the impact of their implementation.

- **Future action programme:** includes the actions established to correct any weakness identified in the internal capital adequacy assessment process, as well as any action established to improve the control and management of risks.

The internal capital adequacy assessment process is carried continuously throughout the year and it involves several areas of the Institution. The process is materialised in the internal capital adequacy assessment report, which is approved annually by the board of directors and submitted to the Supervisor. This report is the basis for dialogue with the Supervisor on the Group's medium-term plans, risk profile and capital adequacy.

04

## Credit risk



## 4. Credit risk

### 4.1. Information on credit risks

#### 4.1.1. Impairment of financial assets

Note 5i) of the notes to the Group's 2025 consolidated financial statements defines the concepts related to impairment of financial assets.

#### Debt instruments and off-balance-sheet exposures

Impairment losses for the period on debt instruments are recognised as an expense in the statement of profit or loss. Impairment losses on debt instruments at amortised cost are recognised through an allowance account that reduces the carrying amount of the asset, while those on debt instruments at fair value through other comprehensive income are recognised in 'Accumulated other comprehensive income'.

Subsequent reversals of previously recognised impairment losses are recognised as income in the statement of profit or loss for the period.

Expected credit losses relate to the difference between all contractual cash flows that are due to the Entity in accordance with the financial asset contract and all the cash flows that the Entity expects to receive discounted at the original effective interest rate, or a reasonable approximation thereof, or the credit-adjusted effective interest rate for purchased or originated credit-impaired financial assets.

Future estimated cash flows from a debt instrument consist of all principal and interest amounts that the Group estimates it will obtain over the life of the instrument. This estimate takes into consideration all relevant information available at the date of preparation of the consolidated financial statements that provides updated and reliable information regarding the possible future collection of the contractual cash flows. Estimates of the future cash flows of instruments supported by collateral consider the flows that would be obtained from foreclosure on the collateral less the costs of obtaining and selling the collateral, irrespective of whether enforcement of the collateral is probable.

Forward-looking information through the use of alternative scenarios and the occurrence of future idiosyncratic items is taken into consideration in both determining expected credit losses and classifying credit exposures. Expected credit losses are weighted by the probability of occurrence of each scenario or idiosyncratic event.

Credit exposures are classified, in accordance with their credit risk, into one of the following categories:

- 1) **Performing loans (Stage 1):** includes transactions for which credit risk has not increased significantly since initial recognition. The loss allowance will be measured at an amount equal to 12-month expected credit losses. Interest income will be calculated by applying the effective interest rate to the financial asset's gross carrying amount.

- 2) **Underperforming loans (Stage 2):** includes transactions with a significant increase in credit risk since initial recognition, but no default event or impairment. The loss allowance will be measured at an amount equal to the financial asset's lifetime expected credit losses. Interest income will be calculated by applying the effective interest rate to the financial asset's gross carrying amount.
- 3) **Non-performing loans (Stage 3):** includes credit-impaired assets; i.e. that present a default event or impairment. The loss allowance is measured at an amount equal to the financial asset's lifetime expected credit losses. Interest income will be calculated applying the effective interest rate to the financial asset's amortised cost (i.e. adjusted for any impairment losses). If these positions are reclassified to Stage 1 or Stage 2, the reversal of previously recognised impairment losses is recognised as a loss allowance update, not as interest income.
- 4) **Write-offs:** transactions for which there is no reasonable expectation of recovery, or which are over 4 years past-due, are included in this category. Classification in this category will entail recognising losses in profit or loss at the financial asset's carrying amount and its full derecognition, although the Group may take any actions necessary to attempt to collect until its rights have been definitively extinguished due to statute of limitations, forgiveness or other causes.

At initial recognition, purchased or originated credit-impaired financial assets, such as those purchased at a large discount that reflects credit losses, are classified as non-performing exposures. The expected credit loss on the purchase or origination of these assets will not be included in the loss allowance or the gross carrying amount at initial recognition. Irrespective of how they are subsequently categorised, when the Bank purchases or originates a credit-impaired financial asset, it recognises the cumulative changes in credit losses from initial recognition as a loss allowance and interest income on these assets by applying the credit-adjusted effective interest rate to the amortised cost of the financial asset.

Expected credit losses are determined and assigned individually to each instrument. Models that provide estimates of the probability of default (PD), loss given default (LGD) and the exposure at default (EAD) are used, depending on the specific situation of each of the exposures and their debtors, which enables a collective estimate of expected losses to be made available on a daily basis. However, in Stages 2 and 3, an individual evaluation of the instruments considered significant is carried out on a systematic basis. Conversely, in the case of Stage 1 and also for non-significant exposures in Stages 2 and 3, the use of expert analysis may exceptionally be triggered when certain results provided by the models are deemed inadequate in the monitoring of the collective estimation.

This information is expanded in note 44 to the annual financial statements, "Risk Management and Policies", which includes sections on the estimation of expected credit losses and the Forbearance policy, which includes the Group's definition for restructured transactions.

The Group has established regular procedures to assess the reliability and consistency of the results obtained through its methods for collectively estimating credit loss allowances through back testing. These tests assess accuracy by subsequently comparing actual losses effectively observed on transactions.

### Equity instruments: Joint ventures and associates

The Group recognises impairment losses on investments in joint ventures and affiliates whenever there is objective evidence that the carrying amount of the investment is not recoverable. The amount of impairment losses will be the difference between the carrying amount of the instrument and its recoverable amount. The recoverable amount is the higher of fair value less costs of disposal and value in use.

For these purposes, the bank will estimate the value in use of an investment as:

- a) the present value of its share of the cash flows expected to be generated by the investee, which will include both those from ordinary activities and from the gains or losses on its sale or disposal, or
- b) the present value of the cash flows expected to be received by the investee in the form of dividends and those relating to the sale or disposal of the investment.

Impairment losses are recognised immediately as an expense in the statement of profit or loss for the period in which they occur. Subsequent reversals of previously recognised impairment losses are recognised immediately as income in the consolidated statement of profit or loss.

There is objective evidence that equity instruments are impaired when an event (or the combined effect of several events) occurs after their initial recognition that indicates that their carrying amount is no longer recoverable. The Entity will use all the information available on the performance and operations of its investee in order to determine whether there is objective evidence of impairment.

### Regulatory definition of default

The default definition used in the regulatory parameters for estimating capital in Bankinter Group complies with the regulatory requirements under Article 178 of Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 (CRR), as amended by Regulation (EU) No 2024/1623 (CRR3), and with the regulatory guidelines and technical standards set out in Guideline EBA/GL/2016/07 and Regulation (EU) No 2018/171 of the Commission of 19 October 2017, and the materiality threshold requirements established in Regulation (EU) 2018/1845 of the European Central Bank of 21 November 2018.

A set of concepts related to default are briefly defined below:

- Past due: failure to pay or meet credit obligations by the payment maturity date.
- Default: (indistinctly bad). Default of a credit obligation in accordance with Article 178 of the Capital Requirement Regulation (CRR) and applicable for the purposes of determining capital requirements. The definition of default is the precise purpose of this section.

- Non-performing/doubtful: credit default criterion according to Bank of Spain accounting circulars and Commission Regulation (EU) 2016/2067 of 22 November 2016 (hereinafter referred to as IFRS 9 interchangeably) used for the purpose of classifying exposures into phases or stages. Specifically, non-performing/doubtful corresponds to Stage 3.

The definition of default in Bankinter Group is set at the debtor level for legal entities and, as permitted by the CRR (art. 178.1), at the operation level for individuals. In this respect, a debtor (for legal entities) or a transaction (for individuals) is considered to be in default if one of the following conditions is met:

- It is in default of its payment obligation (principal, interest or fees) for 90 consecutive days, subject to specified materiality criteria, or is in the trial period: all accounts of the legal entity, if applicable, or a specific transaction in the case of natural persons.
- It is established that there are reasonable doubts about the ability or willingness of the counterparty to meet its payment obligations in a timely manner without the bank having to resort to legal action such as enforcement of collateral.

Includes situations where an obligation has been placed in default, or a foreclosure event has occurred, refinancing processes that may result in a significant decrease in the financial obligation as a result of forgiveness or deferral of principal, interest or fees for the above purpose should be identified as a default.

In the case of legal entities, the default is considered at the level of the debtor, so that all accounts in which that person is a holder are taken into account. In this way, all accounts of which the person is the holder and which are overdue are taken into account in the assessment of the debtor's default status.

The identification of default exposures with individuals takes place at the level of the transaction, such that the rest of the positions belonging to that person are not taken into account.

An exposure shall cease to be classified as a default if the conditions that led to its classification as a default are no longer fulfilled after the expiry of a "trial period", which would be one of the following cases:

- When the amounts outstanding (debt + interest) do not exceed the materiality criteria.
- When the conditions no longer exist which led to the exposure being classified as 'subjective doubtful'.

Although there are certain differences between the definition of 'default' used by the Group and the concept of non-performing/doubtful, (which fully responds to the definition of an 'Impaired Asset' contained in Appendix A of IFRS 9 as well as the indications of its Paragraph B5.5.37, considering in all cases that an instrument is recognised as doubtful when it is more than 90 days past due), these have no substantial effect. Therefore, the differences between portfolios in default and those classified as non-performing/doubtful are in practice limited. The main differences are as follows:

- The concept of non-performing/doubtful is applied at exposure level, which means that transactions from the same borrower with different ratings (e.g. sustainable and unsustainable tranches in a restructuring agreement). On the other hand, for legal entities, the concept of default is applied at the customer level and, once they are considered to be in default, this carries over to all of their exposures. However, it should be noted that, where carry-over criteria are observed in relation to assets classified as non-performing/doubtful and, in general, for assets seen as 'doubtful risk', then this carry-over effect is also applied at the individual level. Doubtful risk is also in default, under the consideration of default UTP.
- The concept of default includes materiality thresholds, as mentioned earlier, not considered in non-performing/doubtful exposures.
- For individuals, the concept of default is applied at the exposure level, without considering automatic carry-over criteria like those in the case of non-performing/doubtful exposures.

Below is the volume of doubtful loans and advances at the beginning and end of the 2025 financial year, as well as the inflows and outflows that have occurred during the period.

#### Changes in the volume of non-performing loans and advances (CR2)

		a
		Gross carrying amount
<b>10</b>	<b>Initial volume of non-performing loans and advances</b>	<b>2,154,977.00</b>
20	Entries to non-performing portfolios	613,746.00
30	Exits from non-performing portfolio	-660,303.00
40	Exits due to write-offs	-337,550.00
50	Exits for other reasons	-322,753.00
<b>60</b>	<b>Final total of non-performing loans and advances</b>	<b>2,108,420.00</b>

Figures in thousands of euros

#### 4.1.2. Transfers and removals from the balance sheet of financial instruments

Note 5k) of the notes to the Group's 2025 consolidated financial statements defines the items related to transfers and removals from the balance sheet of financial instruments.

Transfers of financial instruments are accounted for taking into account the way in which the transfer of the risks and rewards associated with the financial instruments transferred occurs, based on the following criteria:

- If the risks and rewards are substantially transferred to third parties, such as in the case of unconditional sales, sales with a buyback agreement at the fair value on the repurchase date, sales of financial assets with a purchase option acquired or a put option issued that is significantly out of the money, securitisations of assets in which the grantor does not retain subordinated financings nor grants any kind of credit improvement to the new holders, etc, the financial instrument transferred is removed from the balance sheet, and any right or obligation retained or created as a result of the transfer is simultaneously recognised.
- If the risks and rewards associated with the financial instrument transferred are substantially retained, such as in the case of sales of financial assets with a buyback agreement at a fixed price or at the sale price plus an interest charge, security loan contracts in which the borrower has the obligation to return the securities or similar assets, etc, the financial instrument transferred is not removed from the balance sheet and it is continued to be measured with the same criteria used before the transfer. However, the related financial liability is recognised for an amount equal to the consideration received, which is subsequently measured at amortised cost. The income from the financial asset transferred but not derecognised and the expenses incurred on the new financial liability are recognised directly in the statement of profit or loss.
- If the Bank neither transfers nor retains substantially all the risks and rewards of ownership of the transferred financial instrument, such as in the case of sales of financial assets with a purchased call option or written put option that is not deeply in or out of the money, securitisations in which the transferor assumes a subordinated debt or another type of credit enhancement for a portion of the transferred asset, etc, a distinction is made between:
  - If the Group does not retain control of the transferred financial instrument, in which case it is derecognised and any right or obligation retained or created in the transfer is recognised.
  - If the Group retains control of the transferred financial instrument, it continues to recognise it for an amount equal to its exposure to changes in value and recognises a financial liability related to the transferred financial asset.

The net amount of the transferred asset and of the related liability will be the amortised cost of the rights and obligations retained if the transferred asset is measured at amortised cost, or the fair value of the rights and obligations retained if the transferred asset is measured at fair value.

Therefore, financial assets are only removed from the consolidated balance sheet when the cash flows that are generated have been extinguished or when risks and rewards of ownership have been substantially transferred to a third party. Similarly, financial liabilities are only removed from balance sheet when the obligations they generate have been extinguished or when they are acquired for the purpose of cancelling or reselling them.

#### **4.1.3. Criteria for the recognition of earnings when removing assets from the balance sheet**

When the transferred financial asset is removed from the balance sheet in its entirety, the difference between its carrying amount and the sum of a) the consideration received, including any new asset obtained less any liability assumed and b) any accumulated result recognised directly as "Accumulated other comprehensive income" in equity attributable to the transferred financial asset will be recognised in the profit and loss account.

The accounting regulations establish that modification of a contract may, under certain circumstances, lead to derecognition of the balance of the source account and consideration of the destination account as a 'new' transaction. The general interpretation of this paragraph is that derecognition and addition of the balance is only justified by a substantial change in the conditions of the financial instrument.

Accordingly, the Bank's internal procedures provide that refinancing and restructuring processes may only be considered as new transactions when the following conditions are simultaneously met, with due justification:

- a) Doubtful transactions are refinanced or, if not, the new refinancing transaction is reclassified as a doubtful risk.
- b) There is a substantial modification of the terms of the contract. These include:
  - Incorporation of participants that substantially change the risk profile of the transaction.
  - Provision of additional guarantees that substantially improve the prospects of recovery in the event of default.
  - Refinancing is the result of a judicial or bankruptcy process that results in a debt settlement from which a sustainability agreement on a part of the debt emerges. Information on credit risks.

In accordance with Chapter 2 of Title II of Regulation (EU) 575/2013, modified by Regulation (EU) 2019/876, exposure refers to all asset items and memorandum accounts that incorporate credit risk and that have not been deducted from shareholders' equity. Therefore, it includes entries for loans and advances, debt securities, capital instruments, derivatives, cash and deposits with central banks and other demand deposits, guarantees and contingent obligations.

As previously indicated in this report, one of Bankinter Group's primary objectives is to maintain a moderate and prudent risk profile. To do this, Bankinter uses the risk appetite framework as a governance tool to ensure that the risk levels assumed are consistent with the Group's strategy and business plans. These objectives apply to credit risk, which is also the main risk to which the Group is subject. The structure and organisation of the credit risk management and control functions, the relationships between the credit risk management, risk control, compliance and internal audit functions, has been previously explained throughout sections 1.3. and 1.4. of this report.

Note 44 of the notes to the annual consolidated financial statements contains a breakdown of the information on credit risk policies and management, along with the procedures and criteria for estimating it.

This section provides information on credit risk exposures according to Article 442 of Regulation (EU) 575/2013:

- By maturity of exposures.
- Credit quality of credit risk exposures:
  - Non-performing and performing exposures.
  - Restructured or forborne exposures.
  - Performing and non-performing exposures by maturity days.
  - Doubtful exposures by geographic area and sector of activity.
  - Loans and advances to non-financial corporations by sector of activity.
  - Collateral obtained by taking possession and execution processes.

## 4.2. Information on exposure to credit risk

### 4.2.1. Maturity of exposures:

This section presents the breakdown of loans and debt securities by residual maturity, as referred to in Article 442(g) of Regulation (EU) 575/2013:

#### Maturity of exposures (CR1-A)

	a	b	c	d	e	f
	Value of net exposure					
	On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No set maturity	Total
1 Loans and advances	189,417	18,966,473	18,279,019	50,518,482	4,817,615	92,771,006
2 Debt securities	–	1,823,243	5,057,284	11,095,896	22	17,976,444
<b>3 Total</b>	<b>189,417</b>	<b>20,789,716</b>	<b>23,336,303</b>	<b>61,614,378</b>	<b>4,817,637</b>	<b>110,747,450</b>

Figures in thousands of euros

## 4.2.2. Credit quality of credit risk exposures:

This section provides information on credit risk exposures according to Article 442 sections c), e) and f) of Regulation (EU) 575/2013.

### Performing and non-performing exposures and related provisions (CR1)

	Gross carrying amount / nominal amount						Accumulated impairment and provisions and negative fair value adjustments due to credit risk						Collateral and financial guarantees received		
	Performing exposures			Non-performing exposures			Performing exposures - Accumulated impairment and provisions			Non-performing exposures - Accumulated impairment and provisions and negative fair value adjustments due to credit risk			Accumulated partial write-offs	On performing exposures	On non-performing exposures
		Of which: Stage 1	Of which: Stage 2		Of which: Stage 2	Of which: Stage 3		Of which: Stage 1	Of which: Stage 2		Of which: Stage 2	Of which: Stage 3			
5 Cash balances at central banks and other demand deposits	14,821,367	14,821,367	–	–	–	–	–	–	–	–	–	–	–	–	–
<b>10 Loans and advances</b>	<b>91,859,803</b>	<b>89,951,096</b>	<b>1,900,872</b>	<b>2,108,420</b>	<b>214,593</b>	<b>1,780,892</b>	<b>-172,608</b>	<b>-115,508</b>	<b>-59,262</b>	<b>-1,024,609</b>	<b>-17,442</b>	<b>-997,908</b>	–	<b>56,750,826</b>	<b>896,278</b>
20 Central banks	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
30 Public administrations	1,937,315	1,937,315	–	1,233	–	1,233	–	–	–	–	–	–	–	262,877	–
40 Credit institutions	12,031,077	12,030,827	250	109	–	109	–	–	–	–	–	–	–	277,786	–
50 Other financial companies	3,421,934	3,416,588	5,346	14,842	4,312	10,530	-3,025	-3,025	–	-5,809	-1,131	-4,678	–	1,329,870	5,949
60 Non-financial corporations	31,626,876	30,572,234	1,053,422	1,421,975	125,618	1,230,778	-83,414	-54,467	-29,195	-722,492	-10,406	-707,232	–	17,763,140	635,602
70 Of which: SMEs	18,073,650	17,279,490	792,941	1,195,210	99,248	1,048,129	-58,936	-34,400	-24,783	-627,359	-8,115	-614,749	–	12,649,671	547,657
80 Households	42,842,601	41,994,131	841,854	670,260	84,663	538,242	-86,168	-58,016	-30,067	-296,309	-5,905	-285,998	–	37,117,152	254,728
<b>90 Debt securities</b>	<b>15,775,809</b>	<b>15,774,384</b>	<b>1,257</b>	<b>2,637</b>	<b>–</b>	<b>2,637</b>	<b>-2,797</b>	<b>-2,783</b>	<b>-14</b>	<b>-815</b>	<b>–</b>	<b>-815</b>	–	–	–
100 Central banks	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
110 Public administrations	13,658,153	13,658,153	–	–	–	–	-317	-317	–	–	–	–	–	–	–
120 Credit institutions	1,122,518	1,122,518	–	–	–	–	–	–	–	–	–	–	–	–	–
130 Other financial companies	52,660	52,655	–	–	–	–	-319	-319	–	–	–	–	–	–	–
140 Non-financial corporations	942,478	941,057	1,257	2,637	–	2,637	-2,160	-2,146	-14	-815	–	-815	–	–	–
<b>150 Off balance sheet exposures</b>	<b>29,615,313</b>	<b>29,029,139</b>	<b>363,936</b>	<b>83,485</b>	<b>43,961</b>	<b>9,716</b>	<b>-21,833</b>	<b>-19,479</b>	<b>-2,354</b>	<b>-7,300</b>	<b>-1,549</b>	<b>-3,636</b>	–	<b>3,273,118</b>	<b>31,934</b>
160 Central banks	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
170 Public administrations	2,247,458	2,247,458	–	–	–	–	–	–	–	–	–	–	–	880	–
180 Credit institutions	1,261,184	1,261,184	–	–	–	–	-122	-122	–	–	–	–	–	308	–
190 Other financial companies	2,096,178	2,068,520	1,378	380	211	–	–	–	–	-8	–	–	–	97,521	11
200 Non-financial corporations	16,784,059	16,452,080	225,768	82,007	43,505	9,625	-13,884	-11,911	-1,972	-7,264	-1,538	-3,621	–	2,692,848	31,788
210 Households	7,226,435	6,999,897	136,790	1,098	245	92	-7,828	-7,446	-382	-28	-11	-15	–	481,561	134
<b>220 Total</b>	<b>152,072,292</b>	<b>149,575,986</b>	<b>2,266,065</b>	<b>2,194,542</b>	<b>258,553</b>	<b>1,793,246</b>	<b>-197,238</b>	<b>-137,770</b>	<b>-61,630</b>	<b>-1,032,725</b>	<b>-18,990</b>	<b>-1,002,359</b>	–	<b>60,023,944</b>	<b>928,212</b>

Figures in thousands of euros

Details are provided below of the credit quality of forborne exposures at 31 December 2025.

### Credit quality of forborne exposures (CQ1)

	a	b	c	d	e	f	g	h
	Gross carrying amount/nominal amount of forborne exposures				Accumulated impairment and provisions and negative fair value adjustments due to credit risk		Collateral and financial guarantees received on forborne exposures	
	Forborne performing exposures	Forborne non-performing exposures			On forborne performing exposures	On forborne non-performing exposures	Collateral and financial guarantees received on forborne non-performing exposures	
		Of which: in default	Of which: with impairment					
5 Cash balances at central banks and other demand deposits	–	–	–	–	–	–	–	–
<b>10 Loans and advances</b>	<b>376,194</b>	<b>476,295</b>	<b>473,693</b>	<b>384,908</b>	<b>-8,951</b>	<b>-174,461</b>	<b>570,087</b>	<b>255,814</b>
20 Central banks	–	–	–	–	–	–	–	–
30 Public administrations	–	–	–	–	–	–	–	–
40 Credit institutions	–	–	–	–	–	–	–	–
50 Other financial companies	256	6,931	6,931	6,928	–	-3,554	3,465	3,210
60 Non-financial corporations	242,184	357,335	356,998	302,487	-5,575	-146,414	375,189	175,248
70 Households	133,754	112,029	109,764	75,493	-3,376	-24,494	191,433	77,357
80 Debt securities	–	–	–	–	–	–	–	–
90 Loan commitments given	34,805	–	–	–	–	–	–	–
<b>100 Total</b>	<b>410,999</b>	<b>476,295</b>	<b>473,693</b>	<b>384,908</b>	<b>-8,951</b>	<b>-174,461</b>	<b>570,087</b>	<b>255,814</b>

Figures in thousands of euros

The following chart provides information on the credit quality of performing and non-performing exposures by maturity days, at 31 December 2025.

### Credit quality of performing and non-performing exposures by maturity days (CQ3)

	a	b	c	d	e	f	g	h	i	j	k	l
	Gross carrying amount/nominal amount											
	Exposures without defaults			Non-performing exposures								
		Not past due or past due =< 30 days	Past due > 30 days =< 90 days		Unlikely to pay not past due or past due =< 90 days	Past due > 90 days =< 180 days	Past due > 180 days =< 1 year	Past due > 1 year =< 2 years	Past due > 2 year =< 5 years	Past due > 5 year =< 7 years	Past due > 7 years	Of which: with default
5 Cash balances at central banks and other demand deposits	14,821,367	14,821,367	–	–	–	–	–	–	–	–	–	–
<b>10 Loans and advances</b>	<b>91,859,803</b>	<b>91,727,971</b>	<b>131,832</b>	<b>2,108,420</b>	<b>605,175</b>	<b>180,227</b>	<b>313,671</b>	<b>354,510</b>	<b>371,261</b>	<b>80,458</b>	<b>203,119</b>	<b>2,053,729</b>
20 Central banks	–	–	–	–	–	–	–	–	–	–	–	–
30 Public administrations	1,937,315	1,937,315	–	1,233	–	–	1,062	171	–	–	–	1,233
40 Credit institutions	12,031,077	12,031,077	–	109	87	–	22	–	–	–	–	–
50 Other financial companies	3,421,934	3,421,890	44	14,842	4,597	166	3,500	2,103	927	126	3,424	14,823
60 Non-financial corporations	31,626,876	31,588,515	38,361	1,421,975	404,423	84,529	179,393	219,978	317,036	68,827	147,787	1,410,901
70 Of which: SMEs	18,073,650	18,036,446	37,204	1,195,210	304,902	68,290	148,292	181,098	281,331	66,763	144,534	1,192,114
80 Households	42,842,601	42,749,174	93,427	670,260	196,068	95,532	129,694	132,257	53,297	11,505	51,907	626,772
<b>90 Debt securities</b>	<b>15,775,809</b>	<b>15,775,809</b>	<b>–</b>	<b>2,637</b>	<b>–</b>	<b>–</b>	<b>–</b>	<b>–</b>	<b>–</b>	<b>2,637</b>	<b>–</b>	<b>2,637</b>
100 Central banks	–	–	–	–	–	–	–	–	–	–	–	–
110 Public administrations	13,658,153	13,658,153	–	–	–	–	–	–	–	–	–	–
120 Credit institutions	1,122,518	1,122,518	–	–	–	–	–	–	–	–	–	–
130 Other financial companies	52,660	52,660	–	–	–	–	–	–	–	–	–	–
140 Non-financial corporations	942,478	942,478	–	2,637	–	–	–	–	–	2,637	–	2,637
<b>150 Off balance sheet exposures</b>	<b>29,615,313</b>			<b>83,485</b>								<b>66,160</b>
160 Central banks	–			–								–
170 Public administrations	2,247,458			–								–
180 Credit institutions	1,261,184			–								–
190 Other financial companies	2,096,178			380								346
200 Non-financial corporations	16,784,059			82,007								65,301
210 Households	7,226,435			1,098								513
<b>220 Total</b>	<b>137,250,925</b>	<b>107,503,780</b>	<b>131,832</b>	<b>2,194,542</b>	<b>605,175</b>	<b>180,227</b>	<b>313,671</b>	<b>354,510</b>	<b>371,261</b>	<b>83,095</b>	<b>203,119</b>	<b>2,122,526</b>

Figures in thousands of euros

The following chart provides information on the credit quality of non-performing exposures by country, at 31 December 2025.

### Quality of non-performing exposures by geographical location (CQ4)

	a		b		c		d		e		f		g	
	Gross carrying amount/nominal amount													
			Of which: non-performing				Of which: subject to impairment		Of which: subject to impairment		Off-balance sheet provisions for commitments and guarantees given		Accumulated negative changes in fair value due to credit risk for non-performing exposures	
10 On-balance sheet exposures	124,568,036	2,111,057	2,056,366	124,566,656	-1,200,829									–
20 Spain	84,919,034	1,891,761	1,864,189	84,917,658	-1,033,180									–
30 Portugal	14,621,162	175,455	151,034	14,621,162	-122,707									–
40 Ireland	7,518,997	15,584	15,582	7,518,997	-29,963									–
70 Other countries	17,508,843	28,256	25,561	17,508,839	-14,978									–
80 Off balance sheet exposures	29,698,795	83,485	66,160								29,134			
90 Spain	23,261,921	79,124	61,800								21,903			
100 Portugal	3,547,677	4,249	4,249								5,094			
110 Ireland	1,089,570	–	–								1,217			
140 Other countries	1,799,627	111	111								919			
150 Total	154,266,831	2,194,542	2,122,526	124,566,656	-1,200,829						29,134			0

Figures in thousands of euros

Below is a table detailing the credit quality of loan and advance exposures to non-financial corporations by sector of activity at 31 December 2025:

**Credit quality of loans and advances to non-financial corporations by sector of activity (CQ5)**

	a	b	c	d	e	f
	Gross carrying amount					
	Of which: non-performing			Of which: loans and advances subject to impairment	Of which: subject to impairment	Accumulated negative changes in fair value due to credit risk for non-performing exposures
		Of which: with default				
10 Agriculture, livestock raising, forestry and fishing	708,094	41,061	41,057	708,094	-20,584	–
20 Mining and quarrying	74,294	6,446	6,446	74,294	-2,308	–
30 Manufacturing	5,279,062	307,744	307,194	5,279,062	-145,662	–
40 Supply of electricity, gas, steam and air conditioning	1,930,100	17,747	17,745	1,930,100	-13,273	–
50 Water supply	198,722	3,620	3,620	198,722	-2,072	–
60 Construction	3,127,758	156,139	155,989	3,127,758	-98,079	–
70 Wholesale and retail trade	5,742,428	405,803	403,453	5,742,428	-221,419	–
80 Transport and storage	1,583,340	85,485	85,425	1,583,340	-43,268	–
90 Hospitality	1,666,855	69,660	69,610	1,666,855	-30,901	–
100 Information and communication	637,204	43,132	43,093	637,204	-24,657	–
110 Real estate activities	–	–	–	–	–	–
120 Financial and insurance activities	5,259,274	65,493	65,478	5,258,062	-23,399	–
130 Professional, scientific and technical activities	3,740,322	100,623	100,595	3,740,322	-52,551	–
140 Administrative activities and ancillary services	1,433,255	61,876	61,866	1,433,255	-28,867	–
150 Public administration and defence; compulsory social security	97,601	–	–	97,601	-7	–
160 Education	153,701	7,854	7,837	153,701	-3,311	–
170 Health and social service activities	421,993	11,801	11,799	421,993	-5,247	–
180 Artistic, recreational and leisure activities	273,281	18,225	18,219	273,281	-6,192	–
190 Other services	721,567	19,265	11,477	721,567	-84,106	–
<b>200 Total</b>	<b>33,048,851</b>	<b>1,421,975</b>	<b>1,410,901</b>	<b>33,047,639</b>	<b>-805,906</b>	<b>0</b>

Figures in thousands of euros

Finally, this section gives details of the collateral obtained by taking possession and execution processes, at 31 December 2025.

### Collateral obtained by taking possession and execution processes (CQ7)

	a	b
	Collateral obtained by taking possession	
	Value at initial recognition	Accumulated negative changes
10 Tangible fixed assets	–	–
20 Other differences of items classified as property, plant and	21,601	-6,073
30 Residential real estate	14,977	-4,375
40 Commercial real estate	6,376	-1,617
50 Moveable property (vehicles, ships, etc.)	248	-82
60 Debt and equity instruments	–	–
70 Others	–	–
<b>80 Total</b>	<b>21,601</b>	<b>-6,073</b>

Figures in thousands of euros

### 4.3. Information on counterparty credit risk

Chapter 6 of Regulation (EU) No 575/2013) of the European Parliament and the Council, as amended by Regulation (EU) No 2024/1623 (CRR3), describes counterparty credit risk as the risk a counterparty to a transaction could default before the final settlement of the transaction's cash flows. The types of transactions in which this risk may arise are deferred settlement transactions, in which a counterparty agrees to deliver a security on a settlement date, and margin lending transactions, in which an bank extends credit in connection with the purchase, sale, transfer or trading of securities, not including other collateralised securities lending transactions.

The limits with each counterparty, including clearing houses, are established by Risk division after analysing the counterparty's transactions and the macroeconomic situation, and they are submitted for approval to the appropriate body according to the powers circular. The limits are set based on the term of the operations to which the Group is exposed and the guarantee contracts signed between the counterparty and Bankinter Group.

The control of these limits is performed by the Large-corporate Banking Risk function, which is independent of the business units. The same operational platform used by Treasury is used for this control. The use of transactions subject to the counterparty limits is measured in terms of the mark-to-market (MtM) valuation plus the potential risk and bearing in mind possible risk mitigating factors (netting arrangements, collateral). The consumption of the limits of the clearing houses, given the joint guarantee of all members, is considered exclusively the MtM.

#### 4.3.1. Counterparty credit risk management policy

The main objective of counterparty risk management in Bankinter Group is to align security with the Group's business objectives.

The Group has signed collateral agreements - Credit Support Annexes (CSA) or Master Agreements for Financial Transactions (MAFT) - with the majority of the counterparties with which it operates bilaterally. These agreements entail either the receipt of collateral to secure the net balance owed by the counterparty or the contribution of collateral to the counterparty to secure the net balance owed by the Group, depending on how the transaction is settled.

Bankinter Group has a tool designed specifically for the processing and management of collateral contracts signed bilaterally with counterparties. This application enables the management of collateral at a transaction level (useful for controlling and monitoring the status of specific transactions) as well as at a position level by providing aggregate information according to different parameters or characteristics. The market prices of transactions subject to such contracts and the deposits made by the counterparties are monitored on a daily basis. Once the amount of the collateral to be delivered or received is calculated, the collateral demand, or the demand received by the counterparty, is carried out at the intervals established in the contract, usually daily. If significant variations arise in the calculation of the valuation between the counterparties, Treasury Back Office reports them weekly to the Market Risks and Treasury areas for subsequent analysis and monitoring.

The institution's external rating is closely linked to the level of collateral that it must contribute in transactions subject to CSA/MAFT agreements. A downgrade of an institution's credit quality below a certain level would involve, if settlement of the transaction entails providing guarantees, contributing a larger amount. In the particular case of Bankinter Group, a downgrade of its external rating below the investment grade would involve providing an additional 0.03 million euros for the active CSA contracts at 31 December 2025.

#### **4.3.2. Collateral policy and policy regarding the risk of negative correlations**

The Group is not involved in activities involving the offsetting of assets and liabilities. However, it is involved in activities that require the deposit of reciprocal collateral with counterparties calculated on a net risk basis.

The products subject to collateralisations are mainly the derivatives under CSAs (Credit Support Annex) signed, and repurchase and reverse repurchase agreements under GMRA (Global Master Repurchase Agreement) or GMSLAs (Global Master Securities Lending Agreement).

In addition, guarantees for 184 million euros have been deposited in clearing houses.

Derivatives may have wrong way adverse effects between the guarantee and the guarantor, but there is no risk at year end when the entirety of the collateral is received in cash.

#### **4.3.3. Amounts of counterparty credit risk**

In accordance with the conditions set out in Chapter 6, Counterparty Risk, of Title II, of Regulation 575/2013, for the use of the different approaches for calculating the exposure value and capital requirements for counterparty risk, Bankinter uses the standardised approach, as explained in Section 3 of Chapter 6 of the CRR.

Under this method, counterparty risk is obtained by adding the replacement cost and the potential future exposure calculated in accordance with the provisions of this section and multiplying this sum by an alpha factor of 1.4.

Replacement cost is calculated for netting rates within a margin agreement and includes factors such as current market value and collateral received or posted. The latter are used to mitigate risk.

The potential future exposure is calculated by applying a multiplication factor to an add-on which is calculated differently depending on the risk categories of each instrument. These categories are: interest rate risk, foreign exchange risk, credit risk, equity risk and commodity risk. For SFTs, the financial collateral comprehensive method is used, using volatility adjustments in accordance with the supervisory approach set out in CRR3.

Total net counterparty risk exposure amounted to 1,427,542 thousand euros at the close of December 2025, including exposure to OTC derivatives and to central counterparties (CCPs, excluding the contribution to the default guarantee fund) and repurchase agreements.

The breakdown of exposure and of the counterparty credit risk-weighted assets of OTC derivatives and repo operations for 2025 is as follows:

### Analysis of CCR exposure by approach (CCR1)

	a	b	c	d	e	f	g	h
	Replacement cost	Potential Future exposure	Effective EPE	Alpha used to calculate the regulatory exposure value	Exposure value before application of credit risk mitigation techniques	Exposure value after application of credit risk mitigation techniques	Exposure value	Amount of risk-weighted exposure
EU-1 EU – Original risk method (for derivatives)	–	–	–	1.4	–	–	–	–
EU-2 EU – Simplified standardised approach for counterparty risk (for derivatives)	–	–	–	1.4	–	–	–	–
1 Standardised approach for counterparty risk (for derivatives)	18,083	206,071	–	1.4	1,238,518	313,816	313,816	188,412
2 MMI (for derivatives and securities financing transactions)	–	–	–	–	–	–	–	–
2a Of which: groups of nettable securities financing transactions	–	–	–	–	–	–	–	–
2b Of which: groups of derivatives transactions and nettable transactions with deferred settlement	–	–	–	–	–	–	–	–
2c Of which: from groups of nettable transactions with contractual netting across products	–	–	–	–	–	–	–	–
3 Simple method for collateral of a financial nature (for securities financing transactions)	–	–	–	–	–	–	–	–
4 Comprehensive method for financial collateral (for securities financing transactions)	–	–	–	–	9,717,185	406,767	406,767	24,094
5 VaR for securities financing transactions	–	–	–	–	–	–	–	–
6 Total	–	–	–	–	10,955,703	720,583	720,583	212,506

Figures in thousands of euros

### Standardised approach - Counterparty risk exposures by regulatory exposure categories and risk weights (CCR3)

Exposure category	a	b	c	d	e	f	g	h	i	j	k	l
	Risk weighting											Total exposure value
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	
1 Central governments or central banks	289,807	–	–	–	–	–	–	–	–	–	–	289,807
2 Regional governments or local authorities	–	–	–	–	–	–	–	–	–	–	–	–
3 Public sector entities	–	–	–	–	–	–	–	–	–	–	–	–
4 Multilateral development banks	–	–	–	–	–	–	–	–	–	–	–	–
5 International organisations	–	–	–	–	–	–	–	–	–	–	–	–
6 Institutions	–	706,959	–	–	136,113	30,629	–	–	–	–	134,380	1,008,080
7 Corporates	–	–	–	–	–	–	–	–	129,655	–	–	129,655
8 Retail exposures	–	–	–	–	–	–	–	–	–	–	–	–
9 Entities and companies with short-term credit rating	–	–	–	–	–	–	–	–	–	–	–	–
10 Other items	–	–	–	–	–	–	–	–	–	–	–	–
11 Total exposure value *	289,807	706,959	0	0	136,113	30,629	0	0	129,655	0	134,380	1,427,542

Figures in thousands of euros

(\*) Does not include the contribution to the guarantee fund for non-payments.

The breakdown below includes collateral employed in transactions with derivatives at the close of 2025. The fair values of collateral, received and posted, followed the trend in market prices over the year.

### Composition of collateral for counterparty risk exposures (CCR5)

Type of collateral	a	b	c	d	e	f	g	h
	Collateral pledged in derivatives transactions				Collateral pledged in securities financing transactions			
	Fair value of collateral received		Fair value of collateral pledged		Fair value of collateral received		Fair value of collateral pledged	
	Segregated	Not segregated	Segregated	Not segregated	Segregated	Not segregated	Segregated	Not segregated
1 Cash - domestic currency	685,131	–	78,598	–	223,561	–	19,682	–
2 Cash - other currencies	–	–	–	–	–	–	–	–
3 Domestic sovereign debt	–	–	–	–	–	–	–	–
4 Other sovereign debt	–	–	–	–	–	–	–	–
5 Debt of public bodies	–	–	–	–	–	–	–	–
6 Corporate bonds	–	–	–	–	–	–	–	–
7 Equity instruments	–	–	–	–	–	–	–	–
8 Other collateral	–	–	–	–	–	–	–	–
9 Total	685,131	–	78,598	–	223,561	–	19,682	–

Figures in thousands of euros

In transactions settled through clearing houses, risk-weighted assets dropped to 14,869 thousands of euros at the end of the reporting period, taking into account the part of the contribution to the default guarantee fund.

## Exposures to CCP (CCR8)

	a	b
	Exposure value	Amount of risk-weighted exposure
1 Exposures to qualifying CCPs (QCCP) (total)		14,869
2 Transaction exposures to QCCP (excluding initial margin and default fund contributions). Of which:	706,959	14,139
3 (i) OTC derivatives	694,271	13,885
4 (ii) Derivatives traded on organised markets	12,689	254
5 (iii) Securities financing transactions	–	–
6 (iv) Nettable transaction sets for which cross-product netting has been approved	–	–
7 Segregated initial margin	–	–
8 Non-segregated initial margin	–	–
9 Pre-funded contributions to the default fund	36,512	730
10 Non-funded contributions to the default fund	–	–
11 Exposures to unqualifying CCPs (total)	–	–
12 Transaction exposures to unqualifying CCP (excluding initial margin and default fund contributions). Of which:	–	–
13 (i) OTC derivatives	–	–
14 (ii) Derivatives traded on organised markets	–	–
15 (iii) Securities financing transactions	–	–
16 (iv) Nettable transaction sets for which cross-product netting has been approved	–	–
17 Segregated initial margin	–	–
18 Non-segregated initial margin	–	–
19 Pre-funded contributions to the default fund	–	–
20 Non-funded contributions to the default fund	–	–

Figures in thousands of euros

All exposures to central counterparty clearinghouses correspond to QCCPs, which have also followed the evolution of the markets in the period since there have been no changes in the operation of OTC derivatives through these clearinghouses.

Lastly, the Institution had no exposure in credit derivatives at year end.

#### 4.3.4. CVA capital charge

According to Title IV of the CRR, credit valuation adjustments (CVA) are adjustments of valuations of the portfolio of transactions with a counterparty to average market prices that reflect the current market value of the counterparty's credit risk for the Entity.

The credit valuation adjustment (CVA) is the difference between the risk-free valuation and the real valuation of the portfolio, including counterparty credit risk. Thus, the CVA capital charge aims to cover losses caused by changes in the market value of the portfolio due to CVA variations.

Since the entry into force of the CRR3 in 2025, Bankinter has calculated its CVA own funds requirements under the Reduced Basic Approach (BA). Therefore, it does not include positions in hedging instruments to reduce CVA risk in the calculation of its own funds requirements. The new CRR3 approach has resulted in an increase in its capital requirements, which amounted to 3,498 thousand euros at December 2024 calculated using the standard approach under the previous version of the CRR. The own funds requirements for credit risk adjustments for OTC derivative instruments at 31 December 2025 are shown below.

##### Credit valuation adjustment risk under the reduced basic approach (CVA1)

	a	b
	Components of own funds requirements	Own funds requirements
1 Aggregation of systematic components of CVA risk	—	
2 Aggregation of idiosyncratic components of CVA risk	—	
3 <b>Total</b>		<b>8,855</b>

Figures in thousands of euros

#### 4.4. Information on the standardised approach

As established in Chapter 2 of Title II of Regulation (EU) 575/2013, modified by Regulation (EU) 1623/2024 (CRR3), the calculation of capital requirements for credit risk using the standardised approach is based on the category to which the exposure is assigned and on its credit quality. The credit quality will be determined by reference to external ratings that external credit assessment institutions (ECAI) give to obligors or transactions.

##### 4.4.1. Information on external credit assessment institutions

The leading external credit assessment institutions (ECAI) appointed by the Group to determine the risk weightings applicable to its exposures are Standard & Poor's, Moody's, Fitch Ratings and DBRS Ratings. The Group has also designated other smaller ECAIs for counterparties where there are no ratings from the leading ECAIs.

In cases where a counterparty or operation has ratings from different rating agencies, Bankinter follows the procedure laid down in Article 138 of the Regulation, which specifies the following:

- When there are two different credit assessments, the higher risk weighting will be applied.

- However, when there are more than two credit assessments, the two lowest risk weightings shall be used. If the two weightings do not coincide, the higher of the two shall be used.

The exposures for which the ratings of different agencies are used are 'Central governments and central banks', 'Public sector institutions', 'Financial institutions', 'Corporates' and 'Covered bonds'. The following table presents the correspondence between risk ratings from the different credit assessment institutions and the risk weightings applied by exposure class:

Credit quality level	External long-term ratings				Risk weighting				
	S&P	Moody's	Fitch	DBRS	Central governments and central banks	Public sector entities	Institut. <= 3 months	Institut. > 3 months	Corporates
1	AAA to AA-	Aaa to Aaa3	AAA to AA-	AAA to AAL	0 %	20 %	20 %	20 %	20 %
2	A+ to A-	A1 to A3	A+ to A-	AH to AL	20 %	50 %	20 %	30 %	50 %
3	BBB+ to BBB-	Baa1 to Baa3	BBB+ to BBB-	BBBH to BBBL	50 %	100 %	20 %	50 %	75 %
4	BB+ to BB-	Ba1 to Ba3	BB+ to BB-	BBH to BBL	100 %	100 %	50 %	100 %	100 %
5	B+ to B-	B1 to B3	B+ to B-	BH to BL	100 %	100 %	50 %	100 %	150 %
6	< B	< B3	< B	< CCCH	150 %	150 %	150 %	150 %	150 %

#### 4.4.2. Assignment of SCRA grades for financial institutions without ratings

For entities without ratings, Regulation (EU) 575/2013, as amended by Regulation (EU) 2024/1623 (CRR3), permits manual rating based on the standardised credit risk approach assessment (SCRA) grades, with three credit quality buckets assigned based on the end of the reporting period and qualitative characteristics of the entities: grades A, B and C, with the latter being the default grade if it is impossible to assess the grade.

Article 121 of CRR3 regulates the requirements counterparties must meet to be rated in one of the grades, based on compliance with requirements that are specific to banks.

For financial institutions that meet the requirements of Article 119.5 to be treated prudentially as entities, the assessment of the Article 121 requirements is adapted on the basis of whether they meet or exceed any comparable prudential requirements.

Exposures assigned to SCRA grades A, B and C are given a risk weighting in accordance with the following table:

Assessment of credit risk	Grade A	Grade B	Grade C
Risk weighting of exposures < = 3 months	20%	50%	150%
Risk weighting of exposures > 3 months	40%	75%	150%

#### 4.4.3. Credit ratings of public securities issues

At present, no process exists in the Group to assign the credit ratings for public issues of securities to comparable assets not included in the trading book.

#### 4.4.4. Exposure values before and after application of credit risk mitigation techniques

As set forth in chapter 4 of Title II of the Regulation, institutions may recognise, in their calculation of capital requirements for credit risk, the mitigation of risk by collateral, personal guarantees and netting agreements associated with operations that meet the criteria and requirements specified in the regulation.

Depending on the type of guarantee used, the mitigation of the credit risk can be reflected in the exposure value or in the risk weight applied.

The following table presents the amounts for net exposure amounts before and after the application of credit risk mitigation techniques, broken down by risk category and weightings and excluding securitisation positions and exposure to counterparty credit risk.

## Standardised approach: credit risk exposure and effects of credit risk mitigation techniques (CRM) (CR4)

Exposure category	Exposures prior to the application of conversion factors and credit risk mitigation		Exposures after the application of conversion factors and credit risk mitigation		RWA and RWA density	
	On-balance sheet exposures	Off balance sheet exposures	On-balance sheet exposures	Off balance sheet exposures	RWA	RWA density (%)
	a	b	c	d	e	f
1 Central government	31,205,276	1,554,038	32,474,992	391,898	101,215	0.31 %
2 Public sector entities not belonging to central government	1,757,388	279,848	1,766,616	37,532	6,594	0.37 %
EU 2a Regional governments or local authorities	1,651,234	276,627	1,660,462	36,887	6,594	0.39 %
EU 2b Public sector entities	106,155	3,221	106,155	644	–	0.00 %
3 Multilateral development banks	50,405	–	63,991	–	–	0.00 %
EU 3a International organisations						
4 Financial institutions	4,961,965	1,388,604	5,022,515	319,659	1,545,367	28.93 %
5 Covered bonds						
6 Corporates	6,253,884	2,642,354	5,478,420	800,367	5,452,843	86.85 %
6.1 Of which: specialised lending						
7 Subordinated debt and equity securities	711,839	–	711,839	–	1,093,267	153.58 %
EU 7a Subordinated debt	686,329	–	686,329	–	1,029,494	150.00 %
EU 7b Equity	25,509	–	25,509	–	63,774	250.00 %
8 Retail	7,349,036	8,764,100	6,890,247	494,520	5,123,988	69.39 %
9 Secured with mortgages on property and ADC exposures	8,450,937	433,108	11,858,062	162,246	4,294,793	35.73 %
9.1 Secured with mortgages on residential real estate - NON IPRE	5,379,251	305,749	8,786,429	116,004	2,480,636	27.86 %
9.2 Secured with mortgages on residential real estate - IPRE	302,719	8,371	312,947	2,108	103,203	32.76 %
9.3 Secured with mortgages on commercial real estate - NON IPRE	2,021,301	82,012	2,013,444	29,651	1,138,080	55.70 %
9.4 Secured with mortgages on commercial real estate - IPRE	639,782	2,793	637,357	809	413,639	64.82 %
9.5 ADC exposures	107,884	34,184	107,884	13,673	159,235	131.00 %
10. In default	270,920	62,162	275,860	9,068	348,393	122.27 %
EU 10a Institutions and companies with a short term credit assessment						
EU-10b Investments or shares in collective investment undertakings (CIUs)	387,045	–	387,045	–	687,652	177.67 %
EU 10c Other exposures (1)	689,212	–	689,212	–	1,413,156	205.04 %
<b>12 Total</b>	<b>62,087,907</b>	<b>15,124,213</b>	<b>65,618,799</b>	<b>2,215,290</b>	<b>20,067,269</b>	<b>29.58 %</b>

Figures in thousands of euros

Note:

(1) Includes requirements for holdings in financial institutions in which there are significant investments below the 10% threshold (726,517 thousand euros of RWAs) and requirements for deferred tax assets that do not rely on future profitability.

The increase in risk-weighted assets during the year is mainly due to the growth of the credit business, which increased exposure to the regulatory categories.

### 4.4.5. Breakdown of exposure values by risk weights

The following table presents exposure after application of conversion factors and application of credit risk mitigation techniques, broken down by risk weightings and excluding securitisation positions and exposure to counterparty credit risk.

## Standardised approach: exposures by asset classes and risk weights (CR5)

This table shows a breakdown of exposure by original risk weightings, without considering the SME reduction factor.

	Exposure category	Risk weighting													
		0 %	2 %	4 %	10 %	20 %	30 %	35 %	40 %	45 %	50 %	60 %	70 %	75 %	80 %
		a	b	c	d	e	f	g	h	i	j	k	l	m	n
1	Central government	32,765,675													
2	Public sector entities not belonging to central government	1,771,180				32,968									
EU 2a	Regional governments or local authorities	1,664,381				32,968									
EU 2b	Public sector entities	106,799													
3	Multilateral development banks	63,991													
EU 3a	International organisations														
4	Financial institutions					2,919,681	1,785,603		185,142		210,627				
5	Covered bonds														
6	Corporates					25,692					162,323			322,890	
6.1	Of which: specialised lending														
7	Subordinated debt and equity securities														
EU 7a	Subordinated debt														
EU 7b	Equity														
8	Retail									221,753				6,600,218	
9	Secured with mortgages on property and ADC exposures					7,603,068	155,868	65,411		53,134		1,748,957	499,043	1,368,668	
9.1	Secured with mortgages on residential real estate - NON IPRE					7,583,010								1,266,578	
9.1.1	without loan division														
9.1.2	with loan division: (with collateral)					7,583,010									
9.1.3	with loan division: (without collateral)													1,266,578	
9.2	Secured with mortgages on residential real estate - IPRE					20,058	155,868	65,411		53,134		438		6,762	
9.3	Secured with mortgages on commercial real estate - NON IPRE											1,748,519		95,328	
9.3.1	without loan division														
9.3.2	with loan division: (with collateral)											1,748,519			
9.3.3	with loan division: (without collateral)													95,328	
9.4	Secured with mortgages on commercial real estate - IPRE												499,043		
9.5	ADC exposures														
10	In default														
EU 10a	Institutions and companies with a short term credit assessment														
EU-10b	Investments or shares in collective investment undertakings (CIUs)	50,351				22,956	25,821				13,894			9,267	
EU 10c	Other exposures (*)														
12	<b>Total</b>	<b>34,651,197</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>10,604,365</b>	<b>1,967,292</b>	<b>65,411</b>	<b>185,142</b>	<b>274,887</b>	<b>386,843</b>	<b>1,748,957</b>	<b>499,043</b>	<b>8,301,043</b>	<b>0</b>

Figures in thousands of euros

Note:

(\*) Includes requirements for holdings in financial institutions in which there are significant investments below the 10% threshold (726,517 thousand euros of RWAs) and requirements for deferred tax assets that do not rely on future profitability.

	Exposure category	Risk weighting											Total	Of which unrated		
		90%	100%	105%	110%	130%	150%	250%	370%	400%	1250%	Other				
		o	p	q	r	s	t	u	v	w	x	y			z	aa
1	Central government		101,215												32,866,890	32,866,890
2	Public sector entities not belonging to central government														1,804,148	1,804,148
EU 2a	Regional governments or local authorities														1,697,349	1,697,349
EU 2b	Public sector entities														106,799	106,799
3	Multilateral development banks														63,991	63,991
EU 3a	International organisations															
4	Financial institutions		230,606				10,516								5,342,174	4,140,608
5	Covered bonds															
6	Corporates		5,767,883												6,278,787	6,050,933
6.1	Of which: specialised lending															
7	Subordinated debt and equity securities							686,329	25,509						711,839	711,839
EU 7a	Subordinated debt							686,329							686,329	686,329
EU 7b	Equity								25,509						25,509	25,509
8	Retail		562,796												7,384,767	7,384,767
9	Secured with mortgages on property and ADC exposures	84,174	298,297	7,507	49,061		87,119								12,020,308	12,020,308
9.1	Secured with mortgages on residential real estate - NON IPRE		52,846												8,902,434	8,902,434
9.1.1	without loan division															
9.1.2	with loan division: (with collateral)														7,583,010	7,583,010
9.1.3	with loan division: (without collateral)		52,846												1,319,423	1,319,423
9.2	Secured with mortgages on residential real estate - IPRE			7,507			5,876								315,055	315,055
9.3	Secured with mortgages on commercial real estate - NON IPRE		199,249												2,043,095	2,043,095
9.3.1	without loan division															
9.3.2	with loan division: (with collateral)														1,748,519	1,748,519
9.3.3	with loan division: (without collateral)		199,249												294,576	294,576
9.4	Secured with mortgages on commercial real estate - IPRE	84,174			49,061		5,888								638,166	638,166
9.5	ADC exposures		46,203				75,355								121,558	121,558
10.	In default		157,997				126,931								284,928	284,718
EU 10a	Institutions and companies with a short term credit assessment															
EU-10b	Investments or shares in collective investment undertakings (CIUs)		320					264,431		5					387,045	387,045
EU 10c	Other exposures (*)		206,583					482,629							689,212	689,212
12	<b>Total</b>	<b>84,174</b>	<b>7,325,697</b>	<b>7,507</b>	<b>49,061</b>	<b>0</b>	<b>910,895</b>	<b>772,570</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>67,834,089</b>	<b>66,404,458</b>	

Figures in thousands of euros

Note:

(\*) Includes requirements for holdings in financial institutions in which there are significant investments below the 10% threshold (726,517 thousand euros of RWAs) and requirements for deferred tax assets that do not rely on future profitability.

## 4.5. Information on the IRB approach

### 4.5.1. General information

As stated in Chapter 3 of Title II of Regulation (EU) No 575/2013, as amended by Regulation (EU) No 2024/1623 (CRR3), entities use their own risk parameters for the calculation of risk-weighted exposures under the Internal Rating Based (IRB) approach.

Bankinter Group uses its own internal models to estimate the risk parameters of its loan book: the probability of default of the operations it grants, the exposure in case of default and the loss that these operations would generate. These models are used for accepting and monitoring credit operations, but also for other Bank processes, such as estimating the price of operations or calculating credit risk capital requirements.

#### **Authorisation by the Supervisor to employ the IRB approach and for the successive implementation plan**

The Group maintains authorisation from the Supervisor since 2008 to use the IRB approach when calculating the capital requirements for credit risk.

Bankinter is currently authorised to employ the IRB approach in the following portfolios in Spain:

- Residential mortgages for individuals.
- Personal loans and consumer loans for individuals.
- Personal loans marketed by Bankinter Consumer Finance in Spain.
- Small enterprises.
- Medium-sized enterprises.
- Very large companies (foundation IRB approach).
- Publicly owned companies (Foundation IRB approach).
- Specialised developer lending.

Likewise, it is authorised to use the IRB method in the residential mortgage portfolio in Portugal.

The supervisor has approved the internal calculation of <sup>1</sup>Probability of Default (PD), Loss Given Default (LGD) and Credit Conversion Factor (CCF) parameters for these portfolios. These parameters are specific for each portfolio and are reviewed annually, in accordance with prevailing regulations.

Bankinter has a rollout plan for the progressive incorporation of the IRB method over the coming years for categories whose exposure class under article 147 of CRR3 already partially have this approach, subject to specific authorisation from the supervisor and the consideration of Permanent Partial Use (PPU) for certain residual portfolios that are in the supervisory approval phase.

Within Bankinter Group, the Global Risk Management Area develops internal ratings models. These models are submitted for approval and subsequent modification to the models committee after independent review by the second line of defence (Internal Validation area) and the third line of defence (Internal Audit area), depending on their materiality. In addition, those internal models with greater materiality are required to be approved by the executive risk committee before they can be implemented.

The models are maintained and reviewed internally at least once a year, in accordance with Bankinter Group's model policy. Backtesting is also periodically carried out as part of this review.

Bankinter Group has a master ratings scale of 17 levels plus the default level. In line with the recommendations for publication set out in part 8 of Regulation (EU) 575/2013, this scale was reduced to 12 levels plus the default level. In line with the recommendations for publication set out in part 8 of Regulation (EU) 575/2013, this scale was reduced to twelve levels plus the default level.

<sup>1</sup> In the case of specialised lending, PD, LGD and CCF parameters are not used, but rather the "Slotting Criteria" method is used, in which grades and residual value are assigned based on regulatory requirements (CRR art 153.5 and 258.6)

Levels of the master scale	Minimum PD (%)	Maximum PD (%)
1	0.00%	<0.1%
2	0.10%	<0.15%
3	0.15%	<0.25%
4	0.25%	<0.5%
5	0.50%	<0.75%
6	0.75%	<1.75%
7	1.75%	<2.5%
8	2.50%	<5%
9	5.00%	<10%
10	10.00%	<20%
11	20.00%	<30%
12	30.00%	<100%
Default risk (13)	100%	100.00%

### Internal rating systems

Bankinter develops internal models for both the portfolios for which the use of the IRB approach has already been authorised for calculating shareholders' equity requirements and for those that are included in the IRB roll-out plan. The rating can be made at the transaction level or customer level. The internal models that rate transactions (scoring models) are used in portfolios for individuals, while the models that rate at the customer level (rating models) are primarily applied to legal entities. The internal models have been developed using statistical methods and were completed using expert criteria.

The quantification of credit risk of a transaction is determined by both its expected loss and its unexpected loss. Expected losses are generally covered using provisions, while unexpected losses must be covered with capital. The estimated unexpected loss given by the models is therefore the basis for calculating regulatory and internal own funds requirements for exposures, and refers to a highly unlikely loss that must be covered using an bank's shareholders' equity.

Both expected and unexpected losses are estimated by calculating internal parameters:

- Probability of Default (PD)
- Loss Given Default (LGD)
- Credit conversion factor (CCF), which is an input for estimating exposure at default (EAD).

When estimating the regulatory parameters, the probability of default (PD) is calculated using historical information to ensure that the range of variability and an adequate balance of "good" and "bad" years are taken into account ("Long Run Average Default Rate" approach), while the severity (LGD) and the credit conversion factor (CCF) are estimated using data relating to a recession period ("Downturn" approach). From a management perspective, parameters are estimated using a methodology that takes into account the stage of the economic cycle in which we are currently located and its projection.

Each internal risk category groups positions that, while sufficiently similar to each other in terms of risk, nevertheless differ sufficiently from other categories to permit statistical modelling.

Models are currently implemented in the Group's operating applications and are widely integrated in management. Its main uses are:

- Calculating capital requirements and expected losses.
- Transaction admission and approval.
- Setting the minimum recommended price of the transaction and its estimated profitability.
- Monitoring or reporting portfolio credit quality.

Models are also used for commercial purposes (pre-approved transaction campaigns, CRM alerts) and early-warning processes.

Collective estimation models for credit risk coverage (provisions) are also available, in accordance with the requirements of the Bank of Spain's accounting Circular and the European regulation transposing IFRS 9. Although these models differ somewhat from IRB models, the key aspects of both are in alignment.

Internal ratings are key in the transaction approval process, either as part of the automatic assessment algorithms or as base information for taking decisions in manually-approved transactions. In retail segment transactions, the transaction scoring model already takes into account the guarantees that mitigate the related risk. In customer rating models, which are primarily used for assessing legal bank transactions, the mitigation of risk through collateral is included in the transaction's LGD.

### **Description of the internal rating process**

When a transaction is being approved, individual exposures are rated according to the corresponding internal model (on the basis of transaction, collateral and customer type), which is part of the automatic study and approval system which is used to process transactions. The model uses the information input in the transaction proposal, information on customer behaviour available in the Institution's databases and other information from external sources which is available. These models are at the account level.

The rating obtained from the internal model forms part of the algorithm that automatically assesses transactions, which incorporates the Institution's risk policies. The transaction is either authorised, rejected or forwarded to a manual approval process. In this process, a PD, LGD and CCF are assigned for each transaction thus rated.

For exposures with legal entities, the systems gather information on the characteristics of the transaction and the customer, and input them into the transaction rating module, which assigns a rating to each transaction based on the corresponding internal model. The rating models for companies are customer-level models. Based on these models, an identical PD is assigned to all the customer's transactions.

This rating forms part of the approval rules which determine whether a transaction is designated as authorised, denied or not able to be approved (in which case the rating is reported and a manual approval process is used for the transaction). When approval is manual, the rating is taken into account in the approval or denial decision.

#### **4.5.2. Exposure values by category and obligor levels**

The following tables show the exposure and risk parameters for those transactions for which the IRB approach is used to calculate own funds requirements for credit risk, distributed by exposure category at the end of December 2025. The information is broken down into categories where in-house estimates are used for all parameters (advanced IRB approach), and where the foundation IRB approach is used for assigning risk weightings (slotting approach).

Bankinter reviews the ratings assigned to customers at least once a month. In addition, the ratings are updated whenever the corresponding information is updated (for example, upon publication of new financial statements).

The loss given default (LGD) and credit conversion factor (CCF) are assigned primarily in consideration of the main characteristics of the transaction, namely: the type of product, collateral, etc. They are assigned at the account level for both individuals and legal entities.

In the case of specialised financing for real estate development, the process follows the slotting criteria approach (CRR, art. 153.5 and Commission Delegated Regulation (EU) 2021/598 of December 14, 2020). In particular, Bankinter has a rigorous approval process for these types of transactions, which includes a comprehensive subjective questionnaire regarding the characteristics of the customer and the project to be financed. This serves as the basis for rating the transaction and is incorporated as relevant information for the assessment decision. Risk policies for admitting these transactions are very strict.

In all transactions falling under categories for which the internal model is applied, both for individuals and legal entities, once a transaction is assessed, the rating, the risk parameters and their updates are fully integrated in the information regarding the customer and the transaction. This information is used in the different management processes (calculation of regulatory and internal shareholders' equity requirements, risk-adjusted returns measurement systems, monitoring of portfolio credit risk, etc.).

## Exposures under IRB approach

Category	Original exposure	Exposure after application of CRM within balance sheet	Exposure after application of CRM off-balance sheet	EAD	Average PD	Average LGD	RWAs	RWA density
Corporates	30,553,010	17,871,108	11,653,546	20,509,969	2.15 %	39.01 %	11,134,732	54.29 %
<b>FIRB</b>	<b>29,232,245</b>	<b>16,909,100</b>	<b>11,414,388</b>	<b>19,442,193</b>	<b>2.05 %</b>	<b>38.78 %</b>	<b>10,501,467</b>	<b>54.01 %</b>
- of which Others	27,138,740	14,936,931	11,414,388	17,470,024	2.01 %	38.64 %	8,987,984	51.45 %
- of which receivable	2,093,505	1,972,169	–	1,972,169	2.43 %	40.00 %	1,513,484	76.74 %
<b>IRB</b>	<b>1,320,765</b>	<b>962,008</b>	<b>239,157</b>	<b>1,067,776</b>	<b>4.02 %</b>	<b>43.15 %</b>	<b>633,264</b>	<b>59.31 %</b>
- of which receivable	55,690	42,379	–	42,379	3.79 %	49.95 %	33,506	79.06 %
- of which Others	1,265,075	919,628	239,157	1,025,397	4.03 %	42.87 %	599,758	58.49 %
Retail	32,345,232	31,282,860	1,011,871	31,821,980	2.96 %	37.78 %	6,478,042	20.36 %
- secured with properties	28,281,077	28,027,963	253,114	28,130,576	1.80 %	33.33 %	4,481,991	15.93 %
- of which Others	3,875,966	3,117,209	758,757	3,553,715	11.80 %	72.32 %	1,932,406	54.38 %
- of which receivable	188,189	137,688	–	137,688	11.68 %	56.05 %	63,646	46.22 %
<b>Total</b>	<b>62,898,241</b>	<b>49,153,967</b>	<b>12,665,417</b>	<b>52,331,949</b>	<b>2.65 %</b>	<b>38.26 %</b>	<b>17,612,773</b>	<b>33.66 %</b>

Figures in thousands of euros

## Exposures under foundation IRB approach (slotting criteria)

Category	Original exposure	Exposure after application of CRM within balance sheet	Exposure after application of CRM off-balance sheet	EAD	RWAs	Expected loss
Specialised lending	879,647	361,208	259,219	620,427	515,381	8,467

Figures in thousands of euros

The following tables reflect the risk parameters and exposure, by PD interval, for those categories for which the advanced IRB approach is used. The intervals used correspond to those recommended in the final report on Guidelines on disclosure requirements under Part Eight of Regulation (EU) 575/2013, published by the EBA.

## IRB Approach – Credit risk exposures by exposure category and PD band (CR6)

Exposure category	PD band	On-balance sheet exposures	Off-balance sheet exposures before applying conversion factors	Exposure weighted average conversion factor	Exposure after the application of conversion factors and credit risk mitigation	Exposure-weighted average PD (%)	Number of obligors (1)	Exposure weighted average LGD (%)	Exposure weighted average maturity (2)	Risk-weighted exposure amount after application of the supporting factors	Risk weighted exposure amount density	Amount of expected losses	Valuation adjustments and provisions
	a	b	c	d	e	f	g	h	i	j	k	l	m
<b>Companies other - IRB</b>													
	0.00 to <0.15	–	–	–	–	–	–	–	–	–	–	–	–
	0.00 to <0.10	–	–	–	–	–	–	–	–	–	–	–	–
	0.10 to <0.15	–	–	–	–	–	–	–	–	–	–	–	–
	0.15 to <0.25	127,329	84,109	27.28 %	150,272	0.19 %	708	44.45 %	3.00	44,013	29.29 %	129	-411
	0.25 to <0.50	190,273	45,227	58.66 %	216,804	0.30 %	698	41.79 %	3.00	78,199	36.07 %	272	-479
	0.50 to <0.75	164,175	28,437	54.15 %	179,573	0.60 %	700	42.73 %	2.00	91,692	51.06 %	463	-397
	0.75 to <2.5	147,444	33,239	49.05 %	163,748	1.32 %	597	41.99 %	3.00	106,198	64.85 %	909	-546
	0.75 to <1.75	147,444	33,239	49.05 %	163,748	1.32 %	597	41.99 %	3.00	106,198	64.85 %	909	-546
	1.75 to <2.5	–	–	0.00 %	–	0.00 %	–	0.00 %	–	–	0.00 %	–	–
	2.5 to <10	215,177	41,874	49.68 %	235,979	3.13 %	989	40.10 %	3.00	185,605	78.65 %	2,961	-2,016
	2.5 to <5	215,177	41,874	49.68 %	235,979	3.13 %	989	40.10 %	3.00	185,605	78.65 %	2,961	-2,016
	5 to <10	–	–	0.00 %	–	0.00 %	–	0.00 %	–	–	0.00 %	–	–
	10 to <100	56,223	5,908	62.27 %	59,902	17.66 %	471	42.18 %	3.00	84,498	141.06 %	4,502	-6,982
	10 to <20	39,459	5,636	61.49 %	42,925	14.16 %	372	42.08 %	3.00	57,576	134.13 %	2,564	-4,973
	20 to 30 <	8,521	128	58.51 %	8,596	20.47 %	30	39.76 %	3.00	11,635	135.36 %	699	-295
	30 to <100	8,243	144	96.08 %	8,381	32.73 %	69	45.19 %	3.00	15,287	182.39 %	1,239	-1,714
	100 (Default)	19,008	363	30.75 %	19,120	100.00 %	182	88.18 %	3.00	9,553	49.96 %	16,009	-17,971
<b>Total</b>		<b>919,628</b>	<b>239,157</b>	<b>44.23 %</b>	<b>1,025,397</b>	<b>4.03 %</b>	<b>4,345</b>	<b>42.87 %</b>	<b>2.82</b>	<b>599,758</b>	<b>58.49 %</b>	<b>25,246</b>	<b>-28,803</b>

Figures in thousands of euros

- (1) The number of obligors is in units  
(2) Maturity is expressed in number of years

PD band	On-balance sheet exposures	Off-balance sheet exposures before applying conversion factors	Exposure weighted average conversion factor	Exposure after the application of conversion factors and credit risk mitigation	Exposure-weighted average PD (%)	Number of obligors (1)	Exposure weighted average LGD (%)	Exposure weighted average maturity (2)	Risk-weighted exposure amount after application of the supporting factors	Risk weighted exposure amount density	Amount of expected losses	Valuation adjustments and provisions
<b>Companies receivable - IRB</b>												
0.00 to <0.15	–	–	–	–	–	–	–	–	–	–	–	–
0.00 to <0.10	–	–	–	–	–	–	–	–	–	–	–	–
0.10 to <0.15	–	–	–	–	–	–	–	–	–	–	–	–
0.15 to <0.25	3,581	–	0.00 %	3,581	0.19 %	41	51.88 %	3.00	1,324	36.97 %	4	-24
0.25 to <0.50	11,705	–	0.00 %	11,705	0.30 %	64	46.69 %	3.00	4,946	42.26 %	16	-74
0.50 to <0.75	11,069	–	0.00 %	11,069	0.60 %	73	48.33 %	3.00	6,666	60.22 %	32	-28
0.75 to <2.5	4,583	–	0.00 %	4,583	1.32 %	53	50.51 %	3.00	3,520	76.81 %	31	-21
0.75 to <1.75	4,583	–	0.00 %	4,583	1.32 %	53	50.51 %	3.00	3,520	76.81 %	31	-21
1.75 to <2.5	–	–	0.00 %	–	0.00 %	–	0.00 %	–	–	0.00 %	–	–
2.5 to <10	6,986	–	0.00 %	6,986	3.05 %	82	52.24 %	2.00	8,421	120.53 %	116	-34
2.5 to <5	6,986	–	0.00 %	6,986	3.05 %	82	52.24 %	2.00	8,421	120.53 %	116	-34
5 to <10	–	–	0.00 %	–	0.00 %	–	0.00 %	–	–	0.00 %	–	–
10 to <100	3,949	–	0.00 %	3,949	18.19 %	42	51.96 %	3.00	8,362	211.72 %	376	-542
10 to <20	2,944	–	0.00 %	2,944	15.71 %	29	51.89 %	3.00	6,283	213.44 %	244	-462
20 to 30 <	587	–	0.00 %	587	20.23 %	8	55.45 %	3.00	1,368	233.18 %	67	-20
30 to <100	419	–	0.00 %	419	32.73 %	5	47.57 %	3.00	710	169.58 %	65	-60
100 (Default)	505	–	0.00 %	505	100.00 %	14	94.67 %	3.00	268	53.17 %	457	-608
<b>Total</b>	<b>42,379</b>	<b>0</b>	<b>0.00 %</b>	<b>42,379</b>	<b>3.79 %</b>	<b>369</b>	<b>49.95 %</b>	<b>2.84</b>	<b>33,506</b>	<b>79.06 %</b>	<b>1,032</b>	<b>-1,332</b>

Figures in thousands of euros

- (1) The number of obligors is in units  
(2) Maturity is expressed in number of years

PD band	On-balance sheet exposures	Off-balance sheet exposures before applying conversion factors	Exposure weighted average conversion factor	Exposure after the application of conversion factors and credit risk mitigation	Exposure-weighted average PD (%)	Number of obligors (1)	Exposure weighted average LGD (%)	Exposure weighted average maturity (2)	Risk-weighted exposure amount after application of the supporting factors	Risk weighted exposure amount density	Amount of expected losses	Valuation adjustments and provisions
	a	b	c	d	e	f	g	h	i	j	k	l
<b>Companies other - FIRB</b>												
0.00 to <0.15	2,355,801	1,292,925	22.04 %	2,640,710	0.08 %	188	39.85 %	3.00	624,291	23.64 %	818	-2,767
0.00 to <0.10	2,355,801	1,292,925	22.04 %	2,640,710	0.08 %	188	39.85 %	3.00	624,291	23.64 %	818	-2,767
0.10 to <0.15	–	–	0.00 %	–	0.00 %	–	0.00 %	–	–	0.00 %	–	–
0.15 to <0.25	10,371	27,420	32.25 %	19,214	0.19 %	34	40.00 %	3.00	7,368	38.35 %	15	-27
0.25 to <0.50	6,890,730	6,926,074	21.23 %	8,361,365	0.29 %	3,299	38.76 %	2.00	3,599,145	43.04 %	9,264	-10,320
0.50 to <0.75	3,454	2,420	22.82 %	4,006	0.60 %	17	40.00 %	3.00	2,687	67.07 %	10	-12
0.75 to <2.5	3,925,623	2,771,750	22.98 %	4,562,619	1.49 %	2,438	38.19 %	3.00	3,627,194	79.50 %	26,049	-8,846
0.75 to <1.75	3,925,623	2,771,750	22.98 %	4,562,619	1.49 %	2,438	38.19 %	3.00	3,627,194	79.50 %	26,049	-8,846
1.75 to <2.5	–	–	0.00 %	–	0.00 %	–	0.00 %	–	–	0.00 %	–	–
2.5 to <10	236,367	185,006	27.46 %	287,175	7.39 %	357	31.22 %	3.00	296,011	103.08 %	6,682	-8,692
2.5 to <5	6,974	6,226	19.53 %	8,190	3.10 %	28	40.00 %	3.00	7,651	93.42 %	102	-33
5 to <10	229,392	178,780	27.74 %	278,985	7.51 %	329	30.97 %	3.00	288,360	103.36 %	6,580	-8,659
10 to <100	140,946	71,086	33.71 %	164,912	21.93 %	566	37.03 %	3.00	276,206	167.49 %	13,566	-8,042
10 to <20	44,357	26,523	27.46 %	51,641	18.46 %	299	30.70 %	3.00	68,280	132.22 %	2,927	-4,536
20 to 30 <	89,609	33,886	32.46 %	100,607	22.68 %	89	39.97 %	3.00	187,465	186.33 %	9,133	-3,040
30 to <100	6,980	10,677	53.23 %	12,663	30.16 %	178	39.43 %	3.00	20,460	161.57 %	1,506	-466
100 (Default)	157,880	32,827	50.83 %	174,567	100.00 %	288	40.00 %	3.00	–	0.00 %	69,826	-103,815
<b>Total</b>	<b>13,721,172</b>	<b>11,309,508</b>	<b>22.05 %</b>	<b>16,214,568</b>	<b>2.01 %</b>	<b>7,187</b>	<b>38.64 %</b>	<b>2.48</b>	<b>8,432,902</b>	<b>52.01 %</b>	<b>126,229</b>	<b>-142,520</b>

Figures in thousands of euros

- (1) The number of obligors is in units  
(2) Maturity is expressed in number of years

	PD band	On-balance sheet exposures	Off-balance sheet exposures before applying conversion factors	Exposure weighted average conversion factor	Exposure after the application of conversion factors and credit risk mitigation	Exposure-weighted average PD (%)	Number of obligors (1)	Exposure weighted average LGD (%)	Exposure weighted average maturity (2)	Risk-weighted exposure amount after application of the supporting factors	Risk weighted exposure amount density	Amount of expected losses	Valuation adjustments and provisions
	a	b	c	d	e	f	g	h	i	j	k	l	m
<b>Companies receivable - FIRB</b>													
	0.00 to <0.15	88,514	–	0.00 %	88,514	0.08 %	29	40.00 %	3.00	20,128	22.74 %	28	-166
	0.00 to <0.10	88,514	–	0.00 %	88,514	0.08 %	29	40.00 %	3.00	20,128	22.74 %	28	-166
	0.10 to <0.15	–	–	0.00 %	–	0.00 %	–	0.00 %	–	–	0.00 %	–	–
	0.15 to <0.25	48	–	0.00 %	48	0.19 %	1	40.00 %	3.00	18	38.35 %	–	–
	0.25 to <0.50	895,732	–	0.00 %	895,732	0.29 %	865	40.00 %	3.00	417,965	46.66 %	1,039	-1,850
	0.50 to <0.75	399	–	0.00 %	399	0.60 %	5	40.00 %	3.00	266	66.83 %	1	-1
	0.75 to <2.5	663,601	–	0.00 %	663,601	1.46 %	791	40.00 %	3.00	596,715	89.92 %	3,873	-1,650
	0.75 to <1.75	663,601	–	0.00 %	663,601	1.46 %	791	40.00 %	3.00	596,715	89.92 %	3,873	-1,650
	1.75 to <2.5	–	–	0.00 %	–	0.00 %	–	0.00 %	–	–	0.00 %	–	–
	2.5 to <10	298,374	–	0.00 %	298,374	7.16 %	375	40.00 %	3.00	449,440	150.63 %	8,927	-917
	2.5 to <5	254	–	0.00 %	254	3.68 %	5	40.00 %	3.00	260	102.14 %	4	-1
	5 to <10	298,120	–	0.00 %	298,120	7.16 %	370	40.00 %	3.00	449,180	150.67 %	8,923	-916
	10 to <100	14,203	–	0.00 %	14,203	20.39 %	63	40.00 %	3.00	28,951	203.84 %	1,164	-473
	10 to <20	7,957	–	0.00 %	7,957	18.47 %	35	40.00 %	3.00	16,344	205.41 %	589	-273
	20 to 30 <	6,139	–	0.00 %	6,139	22.72 %	23	40.00 %	3.00	12,435	202.55 %	561	-200
	30 to <100	107	–	0.00 %	107	30.16 %	5	40.00 %	3.00	173	161.18 %	13	–
	100 (Default)	11,298	–	0.00 %	11,298	100.00 %	56	40.00 %	3.00	–	0.00 %	4,519	-7,842
<b>Total</b>		<b>1,972,169</b>	<b>0</b>	<b>0.00 %</b>	<b>1,972,169</b>	<b>2.43 %</b>	<b>2,185</b>	<b>40.00 %</b>	<b>3.00</b>	<b>1,513,484</b>	<b>76.74 %</b>	<b>19,551</b>	<b>-12,900</b>

Figures in thousands of euros

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(2) Maturity is expressed in number of years

	PD band	On-balance sheet exposures	Off-balance sheet exposures before applying conversion factors	Exposure weighted average conversion factor	Exposure after the application of conversion factors and credit risk mitigation	Exposure-weighted average PD (%)	Number of obligors (1)	Exposure weighted average LGD (%)	Exposure weighted average maturity (2)	Risk-weighted exposure amount after application of the supporting factors	Risk weighted exposure amount density	Amount of expected losses	Valuation adjustments and provisions
	a	b	c	d	e	f	g	h	i	j	k	l	m
<b>Retail Other - IRB</b>													
	0.00 to <0.15	575,025	260	46.68 %	575,146	0.10 %	32,910	91.62 %	–	129,547	22.52 %	525	-1,203
	0.00 to <0.10	140,631	260	46.68 %	140,753	0.06 %	15,425	79.56 %	–	18,731	13.31 %	66	-270
	0.10 to <0.15	434,393	–	0.00 %	434,393	0.11 %	17,485	95.52 %	–	110,816	25.51 %	459	-933
	0.15 to <0.25	107,863	195,312	54.25 %	213,826	0.19 %	8,356	46.42 %	–	31,379	14.67 %	192	-624
	0.25 to <0.50	498,229	163,234	61.93 %	599,312	0.32 %	30,763	70.76 %	–	221,204	36.91 %	1,385	-1,713
	0.50 to <0.75	388,137	121,047	62.40 %	463,668	0.62 %	17,002	63.66 %	–	211,761	45.67 %	1,853	-1,706
	0.75 to <2.5	609,131	128,619	53.93 %	678,493	1.50 %	38,533	70.46 %	–	522,233	76.97 %	7,317	-3,424
	0.75 to <1.75	389,076	118,794	53.93 %	453,144	1.23 %	20,646	62.49 %	–	270,936	59.79 %	3,377	-2,086
	1.75 to <2.5	220,055	9,825	53.88 %	225,349	2.05 %	17,887	86.50 %	–	251,297	111.51 %	3,941	-1,337
	2.5 to <10	401,135	107,641	58.62 %	464,239	3.85 %	23,256	62.69 %	–	373,037	80.35 %	11,853	-3,927
	2.5 to <5	314,941	104,932	58.70 %	376,532	3.29 %	13,572	58.07 %	–	263,425	69.96 %	7,327	-3,140
	5 to <10	86,194	2,709	55.86 %	87,707	6.26 %	9,684	82.56 %	–	109,612	124.97 %	4,527	-787
	10 to <100	201,061	33,111	51.78 %	218,207	20.48 %	15,192	67.29 %	–	270,111	123.79 %	31,484	-18,502
	10 to <20	145,384	29,565	50.48 %	160,309	13.99 %	11,831	66.74 %	–	182,444	113.81 %	14,769	-7,679
	20 to 30 <	11,536	1,592	61.88 %	12,521	20.85 %	685	58.75 %	–	14,180	113.24 %	1,541	-1,290
	30 to <100	44,140	1,954	63.26 %	45,377	43.30 %	2,676	71.61 %	–	73,488	161.95 %	15,173	-9,532
	100 (Default)	336,627	9,533	44.03 %	340,825	100.00 %	16,274	90.53 %	–	173,135	50.80 %	304,160	-222,976
<b>Total</b>		<b>3,117,209</b>	<b>758,757</b>	<b>57.53 %</b>	<b>3,553,715</b>	<b>11.80 %</b>	<b>182,286</b>	<b>72.32 %</b>	<b>0</b>	<b>1,932,406</b>	<b>54.38 %</b>	<b>358,770</b>	<b>-254,073</b>

Figures in thousands of euros

- (1) The number of obligors is in units  
(2) Maturity is expressed in number of years

	PD band	On-balance sheet exposures	Off-balance sheet exposures before applying conversion factors	Exposure weighted average conversion factor	Exposure after the application of conversion factors and credit risk mitigation	Exposure-weighted average PD (%)	Number of obligors (1)	Exposure weighted average LGD (%)	Exposure weighted average maturity (2)	Risk-weighted exposure amount after application of the supporting factors	Risk weighted exposure amount density	Amount of expected losses	Valuation adjustments and provisions
	a	b	c	d	e	f	g	h	i	j	k	l	m
<b>Retail receivable - IRB</b>													
	0.00 to <0.15	–	–	–	–	–	–	–	–	–	–	–	–
	0.00 to <0.10	–	–	–	–	–	–	–	–	–	–	–	–
	0.10 to <0.15	–	–	–	–	–	–	–	–	–	–	–	–
	0.15 to <0.25	6,939	–	0.00 %	6,939	0.19 %	154	51.84 %	–	1,086	15.66 %	7	-32
	0.25 to <0.50	13,320	–	0.00 %	13,320	0.30 %	315	51.23 %	–	2,771	20.80 %	20	-76
	0.50 to <0.75	23,970	–	0.00 %	23,970	0.60 %	532	52.52 %	–	7,666	31.98 %	76	-156
	0.75 to <2.5	32,430	–	0.00 %	32,430	1.32 %	816	52.64 %	–	14,800	45.64 %	226	-179
	0.75 to <1.75	32,430	–	0.00 %	32,430	1.32 %	816	52.64 %	–	14,800	45.64 %	226	-179
	1.75 to <2.5	–	–	0.00 %	–	0.00 %	–	0.00 %	–	–	0.00 %	–	–
	2.5 to <10	35,945	–	0.00 %	35,945	3.08 %	910	52.52 %	–	20,217	56.25 %	581	-501
	2.5 to <5	35,945	–	0.00 %	35,945	3.08 %	910	52.52 %	–	20,217	56.25 %	581	-501
	5 to <10	–	–	0.00 %	–	0.00 %	–	0.00 %	–	–	0.00 %	–	–
	10 to <100	13,105	–	0.00 %	13,105	18.09 %	459	53.46 %	–	11,218	85.60 %	1,298	-1,697
	10 to <20	10,254	–	0.00 %	10,254	14.93 %	365	53.50 %	–	8,315	81.09 %	851	-851
	20 to 30 <	760	–	0.00 %	760	20.42 %	29	53.84 %	–	700	92.18 %	84	-118
	30 to <100	2,091	–	0.00 %	2,091	32.73 %	65	53.11 %	–	2,203	105.34 %	363	-728
	100 (Default)	11,980	–	0.00 %	11,980	100.00 %	436	93.52 %	–	5,886	49.14 %	10,732	-14,164
<b>Total</b>		<b>137,688</b>	<b>0</b>	<b>0.00 %</b>	<b>137,688</b>	<b>11.68 %</b>	<b>3,622</b>	<b>56.05 %</b>	<b>0</b>	<b>63,646</b>	<b>46.22 %</b>	<b>12,941</b>	<b>-16,805</b>

Figures in thousands of euros

(1) The number of obligors is in units

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	PD band	On-balance sheet exposures	Off-balance sheet exposures before applying conversion factors	Exposure weighted average conversion factor	Exposure after the application of conversion factors and credit risk mitigation	Exposure-weighted average PD (%)	Number of obligors (1)	Exposure weighted average LGD (%)	Exposure weighted average maturity (2)	Risk-weighted exposure amount after application of the supporting factors	Risk weighted exposure amount density	Amount of expected losses	Valuation adjustments and provisions
	a	b	c	d	e	f	g	h	i	j	k	l	m
<b>Mortgages - IRB</b>													
	0.00 to <0.15	18,365,029	107,259	39.11 %	18,406,980	0.07 %	172,817	32.03 %	–	1,061,775	5.77 %	4,239	-4,988
	0.00 to <0.10	12,857,949	52,841	38.19 %	12,878,131	0.05 %	123,978	31.23 %	–	585,215	4.54 %	2,150	-2,975
	0.10 to <0.15	5,507,080	54,419	40.00 %	5,528,849	0.12 %	48,839	33.91 %	–	476,559	8.62 %	2,089	-2,013
	0.15 to <0.25	3,566,078	35,157	41.04 %	3,580,507	0.20 %	26,028	35.17 %	–	501,116	14.00 %	2,528	-1,494
	0.25 to <0.50	1,655,824	10,209	45.70 %	1,660,489	0.38 %	17,157	34.07 %	–	329,237	19.83 %	2,002	-1,880
	0.50 to <0.75	797,902	10,617	41.90 %	802,350	0.54 %	6,570	36.00 %	–	202,573	25.25 %	1,414	-490
	0.75 to <2.5	2,433,440	76,588	40.59 %	2,464,525	1.46 %	17,925	33.82 %	–	1,254,456	50.90 %	11,883	-2,500
	0.75 to <1.75	1,505,001	45,533	41.07 %	1,523,700	1.10 %	11,993	34.00 %	–	601,275	39.46 %	5,148	-1,884
	1.75 to <2.5	928,439	31,056	39.88 %	940,825	2.03 %	5,932	33.52 %	–	653,182	69.43 %	6,735	-616
	2.5 to <10	566,998	10,378	45.12 %	571,681	4.80 %	5,106	33.02 %	–	547,534	95.78 %	8,738	-4,144
	2.5 to <5	329,140	10,378	45.12 %	333,822	3.40 %	2,013	35.64 %	–	276,328	82.78 %	3,943	-880
	5 to <10	237,859	–	0.00 %	237,859	6.76 %	3,093	29.34 %	–	271,206	114.02 %	4,795	-3,264
	10 to <100	279,948	1,647	47.52 %	280,731	17.72 %	2,607	33.36 %	–	444,478	158.33 %	15,851	-6,592
	10 to <20	236,577	1,351	43.35 %	237,163	15.67 %	2,272	33.14 %	–	372,850	157.21 %	11,770	-4,003
	20 to 30 <	20,152	281	64.39 %	20,333	20.65 %	158	35.47 %	–	34,312	168.75 %	1,485	-510
	30 to <100	23,220	15	108.55 %	23,236	36.12 %	177	33.75 %	–	37,316	160.60 %	2,596	-2,079
	100 (Default)	362,743	1,259	45.20 %	363,312	100.00 %	4,092	68.45 %	–	140,821	38.76 %	200,552	-79,314
<b>Total</b>		<b>28,027,963</b>	<b>253,114</b>	<b>41.59 %</b>	<b>28,130,576</b>	<b>1.80 %</b>	<b>252,302</b>	<b>33.33 %</b>	<b>–</b>	<b>4,481,991</b>	<b>15.93 %</b>	<b>247,207</b>	<b>-101,401</b>

Figures in thousands of euros

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(2) Maturity is expressed in number of years

## Scope of use of IRB and standard models (CR6-A)

	Exposure value as defined in Article 166 of the CRR for exposures subject to the IRB approach	Total exposure value of exposures subject to the standardised approach and the IRB approach	Percentage of the total exposure value subject to the permanent partial use of the standardised approach (%)	Percentage of the total exposure value subject to the IRB approach (%)	Percentage of total exposure value subject to a deployment plan (%)	
	a	b	c	d	e	
1	Central governments or central banks	34,799,469	34,799,469	100.00 %	0.00 %	0.00 %
2	Regional governments or local authorities	1,929,070	1,929,070	100.00 %	0.00 %	0.00 %
3	Public sector entities	109,375	109,375	100.00 %	0.00 %	0.00 %
4	Institutions		7,086,339	100.00 %	0.00 %	0.00 %
5	Corporates	9,353,726	40,786,382	4.01 %	77.07 %	18.92 %
5.1	Of which: Companies - general		37,078,782	1.73 %	74.15 %	24.12 %
5.2	Of which: Companies - specialised lending		879,647	0.00 %	100.00 %	0.00 %
5.2.1	Of which: Companies - specialised lending, excluding the slotting approach		–	0.00 %	0.00 %	0.00 %
5.2.2	Of which: Companies - specialised lending under the slotting approach		879,647	0.00 %	100.00 %	0.00 %
5.3	Of which: Companies - receivables		2,827,953	14.02 %	76.00 %	9.98 %
6	Retail	25,538,584	57,883,815	7.91 %	55.88 %	36.21 %
6.1	Of which: Retailers - revolving		–	0.00 %	0.00 %	0.00 %
6.2	Of which: Retailers - secured with real estate		37,252,224	0.00 %	75.97 %	24.03 %
6.3	Of which: Retailers - receivables	508,328	696,517	24.51 %	27.02 %	48.47 %
6.4	Of which: Retailers - other (1)	16,059,108	19,935,074	9.01 %	23.72 %	67.27 %
7	Equity exposures	25,509	25,509	100.00 %	0.00 %	0.00 %
EU 7a	Investments or shares in collective investment undertakings (CIUs)	387,045	387,045	100.00 %	0.00 %	0.00 %
8	Other non-credit obligation assets	784,210	784,210	0.00 %	100.00 %	0.00 %
9	<b>Total</b>	<b>77,974,881</b>	<b>141,752,769</b>	<b>34.77 %</b>	<b>44.99 %</b>	<b>20.23 %</b>

Figures in thousands of euros

(1) The percentages in columns "c", "d" and "e" were obtained by expert judgement of the exposure corresponding to Retailers - Other.

### 4.5.3. Risk weightings of specialised lending exposures

Regulation (EU) of the European Parliament and of the Council 2013/575, modified by Regulation (EU) of the European Parliament and of the Council 2024/1623 (CRR3), requires exposures that possess the following characteristics to be classified as specialised lending exposures:

- The exposure is to a bank which was created specifically to finance or operate physical assets.
- The contractual arrangements give the lender a substantial degree of control over the assets and the income that they generate.

- The primary source of repayment of the obligation is the income generated by the assets being financed.

The Regulation classifies exposures into five categories, taking into account diverse factors such as a financial strength, the political and legal environment, the characteristics of the transaction or asset, and the robustness of the sponsor and developer.

The table below shows the exposures assigned to each risk weighting for specialised lending exposures at 31 December 2025:

#### IRB specialised lending (CR10)

Specialised lending: project finance							
Regulatory categories	Remaining maturity	On-balance exposure	Off-balance sheet exposure (allocation approach)	Risk weighting	Exposure value	Amount of risk-weighted exposure	Amount of expected loss
		a	b	c	d	e	f
Category 1	Less than 2.5 years	–	–	50 %	–	–	–
	Equal to or longer than 2.5	13,058	5,246	70 %	15,681	8,585	63
Category 2	Less than 2.5 years	–	–	70 %	–	–	–
	Equal to or longer than 2.5	299,077	492,986	90 %	545,570	446,279	4,365
Category 3	Less than 2.5 years	–	–	115 %	–	–	–
	Equal to or longer than 2.5	40,464	19,498	115 %	50,213	51,212	1,406
Category 4	Less than 2.5 years	–	–	250 %	–	–	–
	Equal to or longer than 2.5	4,055	686	250 %	4,399	9,305	352
Category 5	Less than 2.5 years	–	–	–	–	–	–
	Equal to or longer than 2.5	4,553	22	–	4,564	–	2,282
Total	Less than 2.5 years	–	–	–	–	–	–
	Equal to or longer than 2.5	361,208	518,439	–	620,427	515,381	8,467

Figures in thousands of euros

#### 4.5.4. Probability of Default (PD) per portfolio.

In the following back testing, information is shown on rates and probabilities of default for Bankinter Group portfolios authorised to use the IRB approach for calculating capital requirements.

The objective of these tests is to contrast the regulatory PDs with the observed default frequencies (ODFs) over the last period. None have had substantial changes in the past year.

#### IRB Approach – Retrospective PD testing by exposure category (CR9)

##### Companies other - IRB

Exposure categories	PD band	Number of debtors at the end of the previous year	Of which: non-payment during the year	Average observed default rate (%)	Exposure-weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
a	b	c	d	e	f	g	h
	0.00 to <0.15	–	–	0.00 %	0.00 %	0.00 %	0.000 %
	0.00 to <0.10	–	–	0.00 %	0.00 %	0.00 %	0.000 %
	0.10 to <0.15	–	–	0.00 %	0.00 %	0.00 %	0.000 %
	0.15 to <0.25	708	–	0.00 %	0.19 %	0.19 %	0.000 %
	0.25 to <0.50	698	–	0.00 %	0.30 %	0.30 %	0.002 %
	0.50 to <0.75	700	–	0.00 %	0.60 %	0.60 %	0.000 %
	0.75 to <2.50	597	1	0.02 %	1.32 %	1.32 %	0.004 %
	0.75 to <1.75	597	1	0.02 %	1.32 %	1.32 %	0.003 %
	1.75 to <2.5	–	–	0.00 %	0.00 %	0.00 %	0.000 %
	2.50 to <10.00	989	–	0.00 %	3.13 %	3.13 %	0.004 %
	2.5 to <5	989	–	0.00 %	3.13 %	3.13 %	0.004 %
	5 to <10	–	–	0.00 %	0.00 %	0.00 %	0.000 %
	10.00 to <100.00	471	–	0.00 %	17.66 %	17.66 %	0.092 %
	10 to <20	372	–	0.00 %	14.16 %	14.16 %	0.089 %
	20 to 30 <	30	–	0.00 %	20.47 %	20.47 %	0.100 %
	30.00 to <100.00	69	–	0.00 %	32.73 %	32.73 %	0.100 %
	100.00 (Default)	182	10	0.00 %	100.00 %	100.00 %	0.000 %

Companies receivable - IRB

Exposure categories	PD band	Number of debtors at the end of the previous year	Of which: non-payment during the year	Average observed default rate (%)	Exposure-weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
a	b	c	d	e	f	g	h
	0.00 to <0.15	—	—	0.00 %	0.00 %	0.00 %	0.000 %
	0.00 to <0.10	—	—	0.00 %	0.00 %	0.00 %	0.000 %
	0.10 to <0.15	—	—	0.00 %	0.00 %	0.00 %	0.000 %
	0.15 to <0.25	41	—	0.00 %	0.19 %	0.19 %	0.000 %
	0.25 to <0.50	64	—	0.00 %	0.30 %	0.30 %	0.000 %
	0.50 to <0.75	73	—	0.00 %	0.60 %	0.60 %	0.000 %
	0.75 to <2.50	53	—	0.00 %	1.32 %	1.32 %	0.000 %
	0.75 to <1.75	53	—	0.00 %	1.32 %	1.32 %	0.000 %
	1.75 to <2.5	—	—	0.00 %	0.00 %	0.00 %	0.000 %
	2.50 to <10.00	82	—	0.00 %	3.05 %	3.05 %	0.000 %
	2.5 to <5	82	—	0.00 %	3.05 %	3.05 %	0.000 %
	5 to <10	—	—	0.00 %	0.00 %	0.00 %	0.000 %
	10.00 to <100.00	42	—	0.00 %	18.19 %	18.19 %	0.000 %
	10 to <20	29	—	0.00 %	15.71 %	15.71 %	0.000 %
	20 to 30 <	8	—	0.00 %	20.23 %	20.23 %	0.000 %
	30.00 to <100.00	5	—	0.00 %	32.73 %	32.73 %	0.000 %
	100.00 (Default)	14	1	0.00 %	100.00 %	100.00 %	0.000 %

Companies other - FIRB

Exposure categories	PD band	Number of debtors at the end of the previous year	Of which: non-payment during the year	Average observed default rate (%)	Exposure-weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
a	b	c	d	e	f	g	h
	0.00 to <0.15	188	0	0.00 %	0.08 %	0.08 %	0.000 %
	0.00 to <0.10	188	0	0.00 %	0.08 %	0.08 %	0.000 %
	0.10 to <0.15	0	0	0.00 %	0.00 %	0.00 %	0.001 %
	0.15 to <0.25	34	0	0.00 %	0.19 %	0.19 %	0.000 %
	0.25 to <0.50	3,299	0	0.00 %	0.29 %	0.29 %	0.002 %
	0.50 to <0.75	17	2	0.00 %	0.60 %	0.60 %	0.003 %
	0.75 to <2.50	2,438	10	0.02 %	1.49 %	1.49 %	0.009 %
	0.75 to <1.75	2,438	10	0.02 %	1.49 %	1.49 %	0.009 %
	1.75 to <2.5	0	0	0.00 %	0.00 %	0.00 %	0.000 %
	2.50 to <10.00	357	26	0.07 %	7.39 %	7.39 %	0.046 %
	2.5 to <5	28	8	0.07 %	3.10 %	3.10 %	0.044 %
	5 to <10	329	18	0.07 %	7.52 %	7.52 %	0.048 %
	10.00 to <100.00	566	8	0.04 %	21.93 %	21.93 %	0.047 %
	10 to <20	299	3	0.02 %	18.46 %	18.46 %	0.026 %
	20 to 30 <	89	5	0.10 %	22.68 %	22.68 %	0.090 %
	30.00 to <100.00	178	0	0.00 %	30.16 %	30.16 %	0.000 %
	100.00 (Default)	288	108	0.00 %	100.00 %	100.00 %	0.000 %

**Companies receivable - FIRB**

Exposure categories	PD band	Number of debtors at the end of the previous year	Of which: non-payment during the year	Average observed default rate (%)	Exposure-weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
a	b	c	d	e	f	g	h
	0.00 to <0.15	29	—	0.00 %	0.08 %	0.08 %	0.000 %
	0.00 to <0.10	29	—	0.00 %	0.08 %	0.08 %	0.000 %
	0.10 to <0.15	—	—	0.00 %	0.00 %	0.00 %	0.000 %
	0.15 to <0.25	1	—	0.00 %	0.19 %	0.19 %	0.000 %
	0.25 to <0.50	865	—	0.00 %	0.29 %	0.29 %	0.000 %
	0.50 to <0.75	5	1	0.60 %	0.60 %	0.60 %	0.604 %
	0.75 to <2.50	791	2	1.46 %	1.46 %	1.46 %	1.459 %
	0.75 to <1.75	791	2	1.46 %	1.46 %	1.46 %	1.459 %
	1.75 to <2.5	—	—	0.00 %	0.00 %	0.00 %	0.000 %
	2.50 to <10.00	375	7	7.16 %	7.16 %	7.16 %	7.158 %
	2.5 to <5	5	2	3.68 %	3.68 %	3.68 %	3.678 %
	5 to <10	370	5	0.00 %	7.16 %	7.16 %	0.000 %
	10.00 to <100.00	63	2	20.39 %	20.39 %	20.39 %	20.394 %
	10 to <20	35	1	18.47 %	18.47 %	18.47 %	18.467 %
	20 to 30 <	23	1	22.72 %	22.72 %	22.72 %	22.721 %
	30.00 to <100.00	5	—	0.00 %	30.16 %	30.16 %	0.000 %
	100.00 (Default)	56	12	0.00 %	100.00 %	100.00 %	0.000 %

## Retail other

Exposure categories	PD band	Number of debtors at the end of the previous year	Of which: non-payment during the year	Average observed default rate (%)	Exposure-weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
a	b	c	d	e	f	g	h
	0.00 to <0.15	32,910	33	0.00%	0.10%	0.10%	0.000%
	0.00 to <0.10	15,425	5	0.00%	0.06%	0.06%	0.000%
	0.10 to <0.15	17,485	28	0.00%	0.11%	0.11%	0.000%
	0.15 to <0.25	8,356	27	0.00%	0.19%	0.19%	0.002%
	0.25 to <0.50	30,763	96	0.00%	0.32%	0.32%	0.004%
	0.50 to <0.75	17,002	143	0.01%	0.62%	0.62%	0.008%
	0.75 to <2.50	38,533	718	0.00%	1.50%	1.50%	0.012%
	0.75 to <1.75	20,646	249	0.01%	1.23%	1.23%	0.013%
	1.75 to <2.5	17,887	469	0.02%	2.05%	2.05%	0.018%
	2.50 to <10.00	23,256	1,160	0.01%	3.85%	3.85%	0.032%
	2.5 to <5	13,572	601	0.04%	3.29%	3.29%	0.038%
	5 to <10	9,684	559	0.05%	6.26%	6.26%	0.047%
	10.00 to <100.00	15,192	2,504	0.01%	20.48%	20.48%	0.113%
	10 to <20	11,831	1,199	0.09%	13.99%	13.99%	0.115%
	20 to 30 <	685	144	0.18%	20.85%	20.85%	0.149%
	30.00 to <100.00	2,676	1,161	0.39%	43.30%	43.30%	0.331%
	100.00 (Default)	16,274	11,327	0.00%	100.00%	100.00%	0.000%

## Retail receivable

Exposure categories	PD band	Number of debtors at the end of the previous year	Of which: non-payment during the year	Average observed default rate (%)	Exposure-weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
a	b	c	d	e	f	g	h
	0.00 to <0.15	—	—	—	—	—	—
	0.00 to <0.10	—	—	—	—	—	—
	0.10 to <0.15	—	—	—	—	—	—
	0.15 to <0.25	154	3	0.19%	0.19%	0.19%	0.194%
	0.25 to <0.50	315	—	0.00%	0.30%	0.30%	0.000%
	0.50 to <0.75	532	8	0.60%	0.60%	0.60%	0.604%
	0.75 to <2.50	816	22	1.32%	1.32%	1.32%	1.322%
	0.75 to <1.75	816	22	1.32%	1.32%	1.32%	1.322%
	1.75 to <2.5	—	—	0.00%	0.00%	0.00%	0.000%
	2.50 to <10.00	910	42	3.08%	3.08%	3.08%	3.083%
	2.5 to <5	910	42	3.08%	3.08%	3.08%	3.083%
	5 to <10	—	—	0.00%	0.00%	0.00%	0.000%
	10.00 to <100.00	459	49	18.09%	18.09%	18.09%	18.087%
	10 to <20	365	31	14.93%	14.93%	14.93%	14.928%
	20 to 30 <	29	3	20.42%	20.42%	20.42%	20.420%
	30.00 to <100.00	65	15	32.73%	32.73%	32.73%	32.727%
	100.00 (Default)	436	292	0.00%	100.00%	100.00%	0.000%

Mortgages

Exposure categories	PD band	Number of debtors at the end of the previous year	Of which: non-payment during the year	Average observed default rate (%)	Exposure-weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
a	b	c	d	e	f	g	h
	0.00 to <0.15	172,817	40	0.00%	0.07%	0.07%	0.000%
	0.00 to <0.10	123,978	24	0.00%	0.05%	0.05%	0.000%
	0.10 to <0.15	48,839	16	0.00%	0.12%	0.12%	0.001%
	0.15 to <0.25	26,028	33	0.00%	0.20%	0.20%	0.001%
	0.25 to <0.50	17,157	29	0.00%	0.38%	0.38%	0.002%
	0.50 to <0.75	6,570	11	0.00%	0.54%	0.54%	0.002%
	0.75 to <2.50	17,925	91	0.00%	1.46%	1.46%	0.005%
	0.75 to <1.75	11,993	49	0.00%	1.10%	1.10%	0.004%
	1.75 to <2.5	5,932	42	0.01%	2.04%	2.04%	0.011%
	2.50 to <10.00	5,106	99	0.01%	4.80%	4.80%	0.021%
	2.5 to <5	2,013	32	0.01%	3.40%	3.40%	0.012%
	5 to <10	3,093	67	0.02%	6.76%	6.76%	0.027%
	10.00 to <100.00	2,607	672	0.01%	17.72%	17.72%	0.070%
	10 to <20	2,272	622	0.20%	15.67%	15.67%	0.104%
	20 to 30 <	158	14	0.06%	20.65%	20.65%	0.081%
	30.00 to <100.00	177	36	0.19%	36.12%	36.12%	0.120%
	100.00 (Default)	4,092	3,028	0.00%	100.00%	100.00%	0.000%

#### 4.5.5. Credit risk mitigation techniques

The table below shows the effect of the credit risk mitigation associated with each exposure category and the incidence of the credit risk mitigation techniques with and without substitution effect at 31 December 2025.

##### IRB Approach – Disclosure of the extent of the use of credit risk mitigation techniques (CR7-A)

A-IRB	Total exposures	Credit risk mitigation techniques											Credit risk mitigation methods in the calculation of the amounts of risk-weighted exposures		
		Hedging of credit risk with collateral or similar instruments									Credit risk hedging with personal guarantees		Amount of risk weighted assets without substitution effects (reduction effects only)	Risk-weighted exposure amount with substitution effects (mitigation and substitution effects)	
		Portion of exposures covered by financial collateral (%)	Share of exposures covered by other eligible collateral (%)	Portion of exposures secured by collateral consisting of immovable property (%)	Portion of exposures covered by receivables (%)	Portion of exposures covered by other physical collateral (%)	Portion of exposures covered by other assets and rights used as collateral	Portion of exposures covered by cash on deposit (%)	Portion of exposures covered by life insurance policies (%)	Portion of exposures covered by instruments held by a third party (%)	Portion of the exposures covered by personal guarantees (%)	Part of exposures covered by credit derivatives (%)			
a	b	c	d	e	f	g	h	i	j	k	l	m	n		
1	Central governments and central banks														
2	Regional governments or local authorities														
3	Public sector entities														
5	Corporates	1,067,776	–	–	–	–	–	–	–	–	–	–	–	633,264	633,264
5.1	Of which companies, general	1,025,397	–	–	–	–	–	–	–	–	–	–	–	599,758	599,758
5.2	Of which companies, specialised lending														
5.3	Of which companies, receivables	42,379	–	–	–	–	–	–	–	–	–	–	–	33,506	33,506
6	Retail	31,821,980	–	–	–	–	–	–	–	–	–	–	–	6,478,042	6,478,042
6.1	Of which retail, revolving														
6.2	Of which retail, secured against real estate	28,130,576	–	–	–	–	–	–	–	–	–	–	–	4,481,991	4,481,991
6.3	Of which retail, receivables	137,688	–	–	–	–	–	–	–	–	–	–	–	63,646	63,646
6.4	Of which: retail - others	3,553,715	–	–	–	–	–	–	–	–	–	–	–	1,932,406	1,932,406
7	<b>Total</b>	<b>32,889,756</b>	<b>–</b>	<b>–</b>	<b>–</b>	<b>–</b>	<b>–</b>	<b>–</b>	<b>–</b>	<b>–</b>	<b>–</b>	<b>–</b>	<b>–</b>	<b>7,111,306</b>	<b>7,111,306</b>

Figures in thousands of euros

F-IRB	Total exposures	Credit risk mitigation techniques										Credit risk mitigation methods in the calculation of the amounts of risk-weighted exposures		
		Hedging of credit risk with collateral or similar instruments									Credit risk hedging with personal guarantees		Amount of risk weighted assets without substitution effects (reduction effects only)	Risk-weighted exposure amount with substitution effects (mitigation and substitution effects)
		Portion of exposures covered by financial collateral (%)	Share of exposures covered by other eligible collateral (%)	Portion of exposures secured by collateral consisting of immovable property (%)	Portion of exposures covered by receivables (%)	Portion of exposures covered by other physical collateral (%)	Portion of exposures covered by other assets and rights used as collateral	Portion of exposures covered by cash on deposit (%)	Portion of exposures covered by life insurance policies (%)	Portion of exposures covered by instruments held by a third party (%)	Portion of the exposures covered by personal guarantees (%)	Part of exposures covered by credit derivatives (%)		
a	b	c	d	e	f	g	h	i	j	k	l	m	n	

1	Central governments and central banks														
2	Regional governments or local authorities														
3	Public sector entities														
4	Institutions														
5	Corporates	20,062,620	–	–	–	–	–	–	–	–	–	–	–	11,016,849	11,016,849
5.1	Of which companies, general	17,470,024	–	–	–	–	–	–	–	–	–	–	–	8,987,984	8,987,984
5.2	Of which companies, specialised lending	620,427	–	–	–	–	–	–	–	–	–	–	–	515,381	515,381
5.3	Of which companies, receivables	1,972,169	–	–	–	–	–	–	–	–	–	–	–	1,513,484	1,513,484
6	<b>Total</b>	<b>20,062,620</b>	–	–	–	–	–	–	–	–	–	–	–	<b>11,016,849</b>	<b>11,016,849</b>

Figures in thousands of euros

#### 4.5.6. Changes in the period in terms of risk-weighted assets in advanced IRB models

The main changes during the final quarter in risk-weighted assets under the advanced IRB approach are as follows.

##### Statement of flows of risk-weighted amounts of exposures to credit risk subject to the IRB approach (CR8)

	Amount of risk-weighted exposure
	a
1 Risk-weighted exposure amount at the end of the previous reporting period	18,160,846
2 Size of assets	652,128
3 Asset quality	4,105
4 Model updates	–
5 Methods and policies	–
6 Acquisitions and assignments	–
7 Exchange rate fluctuations	–
8 Other	–
9 Risk-weighted exposure amount at the end of the reporting period	18,817,079

Figures in thousands of euros

## 4.6. Securitisations

### 4.6.1. General characteristics

Pursuant to Regulation (EU) 575/2013, as amended by Regulation (EU) 2024/1623 (CRR3), securitisation is defined as a transaction or scheme whereby the credit risk associated with an exposure or pool of exposures is divided into two or more independently-transferrable tranches, which have the following characteristics:

- Payments in the transaction or scheme are dependent upon the performance of the exposure or pool of exposures.
- The subordination of the tranches determines the distribution of losses during the ongoing life of the transaction or scheme.

The assessment of these characteristics to determine whether there is a securitisation transaction will be carried out according to law and on the economic substance of the transaction.

The observed changes in risk-weighted assets in the period were basically due to two factors.

Methodological adjustments to the probabilities of default (PD) associated with the large corporates book as part of the review and update of the internal approaches.

And a gradual improvement in the credit quality of the portfolio, derived from the continuous review of internal customer ratings, which has contributed to a reduction in risk density in the IRB scope.

A **synthetic securitisation** is a transaction in which the credit risk is divided into tranches and transferred through the purchase of credit protection on the securitised exposures, either through the use of credit derivatives or guarantees.

A **traditional securitisation** differs in that it entails the economic transfer of the securitised exposures to a securitisation special purpose entity (SSPE) that issues securities. The securities issued by this bank represent no payment obligations for the originator institution.

According to this definition, the Group had one outstanding traditional securitisation at 31 December 2025.

#### Group securitisation activity objectives

During certain years, traditional securitisations played a relevant role in funding liquidity growth and management in the medium/long term. This programme was complemented by the remaining financing and capital instruments, thereby diversifying the reliance on wholesale markets.

The primary objective of securitisation has been to serve as an instrument for effectively managing the balance sheet, as a source of liquidity at a competitive cost and as a regulatory capital management tool, through the transfer of risk.

### **Functions performed by the Group in securitisation processes and degree of involvement**

Bankinter Group intervenes in securitisation operations as an originator, participating in the initial agreement to create the obligations or potential obligations of the debtor or potential debtor and giving rise to the securitisation of the exposure.

It also participates as a counterparty in payment agent contracts and administrator of the loans, and counterparty in an interest rate swap contract for certain securitisation funds, by virtue of which the fund will make payments to Bankinter calculated on the reference interest rate for participated mortgage loans, and, as counterparty, Bankinter will make payments to the fund calculated on the reference interest rate set for bonds.

Since the start of its securitisation activity, Bankinter Group has maintained adequate risk management standards in respect of the securitised transactions, applying the same grant, monitoring and recovery criteria for securitised transactions as for non-securitised transactions.

Bankinter did not make any new issues in 2025, nor has it added or substituted underlying positions in its existing issues. Since the start of its securitisation activity, Bankinter has maintained the same risk management standards for its securitised and non-securitised transactions.

Currently, Bankinter is not considering launching any new securitisations due to the nature of its business model, which make it unnecessary in terms of either efficiency or capital.

### **Nature of the risks inherent to securitised assets**

The securitisation activity carries with it a series of associated risks that have repercussions for originator and investor institutions. The main risks are:

- **Credit risk:** this is the main risk that is transferred from the issuer to the investors that have acquired securitised assets. This risk occurs when, on the payment date, the borrower does not meet their contractual obligations of making the payment in due time and form. This non-compliance results in the impairment of the underlying asset of the securitisation positions originated.
- **Prepayment risk:** this risk is associated with an early redemption of the underlying assets, either partial or total. With this repayment, the real maturity of the securitisation positions is reduced, while the contractual maturity of the underlying assets is maintained.
- **Basis risk:** basis risk exists where the settlements of interest rates of securitised assets do not match the interest rates of the securitisation positions. To cover this risk, it is common to undertake interest rate swaps, the so-called 'securitisation swap'. To mitigate this risk, all Bankinter's securitisation funds have an associated basis swap.

- **Liquidity risk:** from the viewpoint of the originator, this risk reduces with the securitisation process, which consists of converting illiquid assets into liquid bonds to be traded on secondary debt markets, which are organised financial markets. Bankinter is hardly affected by this risk, as it does not have securitisations of promissory notes or additional lines of liquidity.

Liquidity risk also exists from the viewpoint of the investor, something that does not affect Bankinter, since, as already explained in this chapter, the Group does not carry out any investment activity.

### **Accounting policy in securitisation activity**

The criteria followed by Bankinter Group in transfers and derecognition of financial instruments, including asset securitisations, are detailed in Note 5k) of the notes to the annual consolidated financial statements and in section 4.1.2. of this report. Accounting information in this respect can also be found in Note 25 of the notes to the annual consolidated financial statements on Transfers of financial assets.

### **Methods used for calculating credit risk-weighted exposures in securitisation activities**

In case of a significant transfer of risk during the securitisation process, as foreseen in articles 2024 and 1623 of Regulation (EU) 2013/575, as modified by Regulation (EU) 2024/1623 (CRR3), the securitisation exposures maintained by the institution could be treated under the securitisation framework established in capital adequacy regulations. Otherwise, securitisation exposures will be treated as if they had not been securitised.

Regulation (EU) 2017/2401, amending the capital requirements for positions in a securitisation, came into force on 1 January 2020. This new regulation establishes a series of methods for calculating the amounts of risk-weighted exposures in securitisation positions, and establishes a hierarchy to determine the method to be used, according to which:

- **SEC-IRBA approach:** where the conditions set out in Article 258 are met, an institution will use the SEC-IRBA approach.
- **SEC-SA approach:** where the SEC-IRBA method may not be used, entities will use the SEC-SA method, in accordance with Articles 261 and 262.
- **SEC-ERBA approach:** where the SEC-SA approach cannot be used, an institution shall use the SEC-ERBA approach in accordance with Articles 263 and 264 for rated positions or positions in respect of which an inferred rating may be used.

Bankinter Group follows the SEC-IRBA approach to calculate risk-weighted exposures in securitisations.

Originator institutions may limit the risk-weighted exposure amounts calculated in respect of its positions in a securitisation to that which would produce the underlying exposure amounts which would be produced if the securitised assets had not been securitised.

The Institution closely monitors the credit risk trends of underlying assets in the positions it originates, given that their behaviour can directly influence the risk-weighted assets needed to cover the securitisation positions held on its balance sheet.

#### **4.6.2. Securitisations originated**

##### **Rating agencies used**

The rating agencies that have been involved in the issues originated by Bankinter are S&P, Moody's and Fitch.

In all securitisation funds, the agencies have evaluated the risk of the entire issue structure:

- Issuing ratings for all bond tranches
- Establishing the volume of credit enhancements
- Establishing the necessary triggers

In all issues, in addition to the initial rating, the agencies regularly monitor the behaviour of the underlying assets and of the fund structure, in order to update the bond ratings to take into account any improvement or deterioration in the level of credit risk.

##### **Securitisation activity in the Group**

At 31 December 2025, the Group had one outstanding traditional securitisation on its balance sheet. Note 25 of the Group's annual financial statements details the transfers of financial assets through securitisations. The Group does not act as sponsor for any securitisation issue.

The following table shows the outstanding balances of assets underlying the securitisation issues originated by the Institution, by asset class.

## Securitisation exposures in the banking book (SEC1)

	a	b	c	d	e	f	g
	The bank acts as originator						
	Traditional				Synthetic		Subtotal
	STS	Of which: significant transfer of risk	Non STS	Of which: significant transfer of risk		Of which: significant transfer of risk	
2 Retailers (total)	–	–	145,725	145,725	–	–	
3 Mortgage on residential real estate	–	–	145,725	145,725	–	–	145,725
4 Credit card	–	–	–	–	–	–	–
5 Other retail exposure	–	–	–	–	–	–	–
6 Resecuritisation	–	–	–	–	–	–	–
7 Wholesale (total) - of which	–	–	–	–	–	–	–
8 Corporate loans	–	–	–	–	–	–	–
9 Mortgage on residential real estate	–	–	–	–	–	–	–
10 Leases and receivables	–	–	–	–	–	–	–
11 Other wholesale exposures	–	–	–	–	–	–	–
12 Resecuritisation	–	–	–	–	–	–	–

Figures in thousands of euros

During 2025, Bankinter originated no securitisation transactions and, therefore, no profit or loss has been recognised for this activity. The Group also has no assets pending securitisation.

At year-end 2025, the securitisation bonds issued by securitisation funds acquired or retained by the Group are included on the liabilities side of the balance sheet, reducing the amount of the corresponding issues, under "Debt securities issued", as detailed in note 25 to the Group's financial statements. There were, therefore, no securitisation positions in the "Financial assets held for trading" portfolio at the end of the reporting period.

The tables below provides details of the securitisation positions held on the statement of financial position in which the Institution acts as originator and for which the significant and effective transfer of risk requirement is met, distributed by the weighting assigned based on the credit quality of each position:

## Securitisation exposures in the banking book and related regulatory capital requirements when the institution acts as originator or sponsor (SEC3).

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
	Exposure values (by ranges of risk weights/deductions)					Exposure values (by regulatory approach)				RWA (by regulatory approach)			Capital requirement after the maximum limit				
	Weighting <=20%	Weighting >20% and <= 50%	Weighting >50% and <= 100%	Weighting >100% and <= 1250%	Weight 1250% / deductions	SEC-IRBA	SEC - ERBA	SEC - SA	1250% / Capital deduction	SEC-IRBA	SEC-ERBA (including internal assessment approach)	SEC - SA	Weight 1250% / deductions	SEC-IRBA	SEC-ERBA (including internal assessment approach)	SEC - SA	Weight 1250% / deductions
1 Total exposures	0	0	145,725	0	0	145,725	0	0	0	159,905	0	0	0	4,678	0	0	0
2 Traditional operations	0	0	145,725	0	0	145,725	0	0	0	159,905	0	0	0	4,678	0	0	0
3 Securitisation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4 Retail	0	0	145,725	0	0	145,725	0	0	0	159,905	0	0	0	4,678	0	0	0
5 Of which STS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6 Wholesale	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7 Of which STS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8 Resecuritisation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9 Synthetic operations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10 Securitisation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11 Retail underlying	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12 Wholesale	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13 Resecuritisation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Figures in thousands of euros

At the end of 2025, risk-weighted assets amounted to 58,477 thousands of euros vs 85,068 thousands of euros last year. The variation is mainly due to the amortisation of the Bankinter 11 FTH fund for 85,871 thousand euros and to changes in the IRB mortgage model that is applied to calculate the minimum capital requirements of the securitised positions and acts as a ceiling.

Below is a table showing a breakdown by type of exposure of the securitised outstanding balance, the volume of transactions impaired and in default, and the losses recognised in the year.

## Exposures securitised by the bank - Exposures with default and adjustments for specific credit risk (SEC5)

	a	b	c
	Exposures securitised by the bank: the bank acts as originator or sponsor		
	Total nominal outstanding balance	Of which: exposures with default	Total amount of specific credit risk adjustments made during the period
1 Total exposures	160,910	4,794	-535
2 Retailers (total)	160,910	4,794	-535
3 Mortgage on residential real estate	160,910	4,794	-535
4 Credit cards	0	0	0
5 Other retail exposure	0	0	0
6 Resecuritisation	0	0	0
7 Wholesalers (total)	0	0	0
8 Corporate loans	0	0	0
9 Mortgage on residential real estate	0	0	0
10 Leases and receivables	0	0	0
11 Other wholesale exposures	0	0	0
12 Resecuritisation	0	0	0

Figures in thousands of euros

### 4.6.3. Investment securitisations

At 31 December 2025, Bankinter did not act as an investor in any securitisation.

## 4.7. Information on credit risk mitigation techniques

### 4.7.1. Main characteristics of credit risk mitigation policies

Title II, Chapter 4 of Regulation (EU) 575/2013, modified by Regulation (EU) 2024/1623 (CRR3), establishes the admissible credit risk mitigation techniques in reducing the capital charge for credit risk and calculating the mitigating effect these techniques have on credit risk exposures.

Prudence is the hallmark of Bankinter Group's lending policy: criteria for granting credit are based on the customer's verified solvency and capacity to make repayments, in line with a realistic payment plan and taking only ordinary customer income into consideration. Transaction guarantees are only considered a secondary method of recovery.

With respect to the implementation and management of guarantees covering and mitigating credit risk exposure, Bankinter Group has robust control processes for evaluating and managing eligible collateral that ensure that such coverage is effective. These evaluation and control processes are addressed in the following sections.

### 4.7.2. On-balance sheet and off-balance sheet netting

Regarding operations in capital markets, guarantees for instruments in the trading book are included in the clauses of the corresponding financial instruments. In contrast, derivative transactions that Bankinter performs with its counterparties are governed by international framework agreements (ISDA or CMOF), which incorporate netting of off-balance sheet transactions. In addition, Bankinter has entered into credit support annexes (CSA) with the majority of the counterparties with which it operates bilaterally. These agreements entail either the reception of collateral to secure the net balance owed by the counterparty or the contribution of collateral to the counterparty to secure the net balance owed by Bankinter, depending on how the transaction is settled.

These mitigation techniques (netting and CSAs) decrease the total counterparty risk exposure.

### 4.7.3. Coverage based on collateral

Collateral is considered to be assets that secure an obligation. These assets can be pledged by the customer or by a third party.

In accordance with the Regulation, the following may be considered credit risk mitigation techniques, amongst others:

- Cash on deposit with, or instruments similar to cash held by, the lending institution.
- Debt securities issued by central governments or central banks, where the securities have a credit assessment by an ECAI or recognised export credit agency.
- Debt securities issued by institutions, where the securities have a credit assessment by an ECAI determined to be associated with credit quality step 3 or above.
- Equities or convertible bonds that are included in a main index.
- Gold.

Pledged financial assets are associated through an IT system with the risk positions, thus guaranteeing their availability is blocked. The IT system also automatically updates the assessment of these positions at market prices. Note 43 to the Group's consolidated financial statements describes the measurement techniques for all of the Group's financial instruments at fair value.

Among the types of collateral accepted by Bankinter, primary residence mortgages are particularly important.

The mortgage process is robust and is based on independent expert appraisals. Third-party appraisal companies are selected periodically from amongst those certified by Bank of Spain. The appraisal process is completely independent of the Commercial network. Under this centralised process, the appraisal companies assigned for each appraisal are selected at random. Accordingly, the transactions of any given branch are guaranteed to have been assessed by different appraisal companies.

In accordance with the risk policy, mortgaged assets must be located in consolidated urban areas where the property market has significant supply and demand so as to allow sales to be processed quickly where necessary. This criteria applies to both homes and to commercial premises and offices used to secure credit risk. Once a transaction is formalised, the mortgage process in place at Bankinter ensures that the collateral is correctly recorded in a public deed and that the deed is entered in the corresponding registry. In addition, processes are in place to periodically update the appraisal values throughout the life cycle of the product, covering the risk of volatility in the real-estate market and allowing for adequate coverage of transactions as from formalisation of the loan until maturity.

In order to reduce credit risk on its transactions, Bankinter Group also uses monetary deposits, fixed income securities and equities traded on official markets and investment funds, with priority given to liquidity of the collateral provided.

#### Overview of credit risk mitigation techniques: disclosure of information on the use of credit risk mitigation techniques (CR3)

	Unguaranteed carrying amount	Guaranteed carrying amount			
			Of which: secured by collateral	Of which: secured by financial guarantees	Of which: secured by credit derivatives
	a	b	c	d	e
1 Loans and advances	49,945,269	57,647,104	46,153,157	11,493,947	–
2 Debt securities	15,774,834	–	–	–	–
3 Total	65,720,103	57,647,104	46,153,157	11,493,947	–
4 Of which: non-performing exposures	189,354	896,278	385,682	510,596	–
EU-5 Of which: with default	–	–	–	–	–

Figures in thousands of euros

Hedging with credit derivatives, carried out mainly through credit default swaps (CDS), is not common in the Group's operations and there were no such transactions at 31 December 2025.

#### 4.7.4. Risk concentration

For management purposes, Bankinter Group has established risk concentration limits that are significantly more stringent than those required by regulation.

Due to the Bank's risk management policies, and settlement and collateral agreements entered into with virtually all counterparties, there is no relevant concentration of risk.

05

## Market risk in the trading book



## 5. Market risk in the Assets held for trading portfolio

Market risk relates to the possibility of suffering losses due to changes in the value of positions held in the trading book. This risk arises from changes in the following risk factors: interest rate, exchange rate, equities and commodities.

Title IV of Regulation (EU) No 575/2013 CRR, as modified by CRR3, details the calculation of own funds requirements for market risk in the trading book. The new regulatory framework for market risk - the Fundamental Review of the Trading Book (FRTB) - is scheduled to come into effect on 1 January 2027, after several postponements by the European Commission.

### 5.1. Differences in Assets held for trading for the purposes of Regulation (EU) 575/2013 on prudential requirements for credit institutions and investment firms

In accordance with title I, chapter 3 of Regulation (EU) No 575/2013 of the European Parliament and of the Council, as modified by Regulation (EU) No 2024/1623 (CRR3), the trading book means all positions in financial instruments and commodities held by an institution either with trading intent or in order to hedge positions held with trading intent.

To that end, the regulatory trading book defined by Bankinter Group contains the positions managed from the Group's trading room, by the Trading area, to sell them in the short term for a profit.

The "Financial assets held for trading" portfolio is not limited to the activity of a specific business unit, as it is based on the accounting criteria set down in the current accounting regulations.

Note 5 g) of the notes to the Group's consolidated financial statements describes the financial assets that should be classified in the 'Financial assets at fair value through profit or loss held for trading' portfolio. Such assets are recognised in this portfolio when the business model chosen to manage them aims to obtain profits from selling or trading them.

Within the portfolio of financial assets at fair value through profit or loss held for trading, the trading book must necessarily include all assets that meet the following conditions:

#### Financial assets

- They are originated or acquired for the purpose of realising them in the short term.
- They are part of a portfolio of identified financial instruments that are managed together for which there is evidence of a recent pattern of short-term profit taking.
- they are derivative instruments that do not meet the definition of financial guarantee contracts and have not been designated as hedging instruments.

The 'Financial liabilities held for trading' portfolio must include all financial liabilities that have any of the following characteristics:

#### Financial liabilities

- They are issued with an intention to repurchase them in the near term.
- They are short securities positions.
- They are part of a jointly identified and managed portfolio of financial instruments for which there is evidence of a recent pattern of short-term profit taking.
- They are derivative instruments that do not meet the definition of financial guarantee contracts and have not been designated as hedging instruments.

The mere fact that a financial liability is used to finance trading activities does not mean that it will be included under this category.

### 5.2. Characteristics of the risk management system and models used

Bankinter Group's board of directors entrusts the Treasury and Capital Markets division with taking action on behalf of the Bank in financial markets, through the Trading Area. The purpose of the trading business is to optimise the business opportunities that arise, using the most appropriate financial instruments at any given time, including interest rate, exchange rate and equity derivatives.

The financial instruments traded should generally be sufficiently liquid and adequately hedged by financial derivatives. The risk that may arise from managing the institution's own accounts is associated with potential changes in the market value of positions as a result of movements in interest rates, stock market prices, exchange rates, volatility and credit spreads.

The Group uses financial derivatives traded on organised markets or bilaterally with organised off-market counterparties (OTC) both in its own transactions and in transactions with the wholesale and retail customer segments.

The Group takes positions in derivatives in order to formalise hedges, actively manage other financial assets and liabilities or benefit from changes in their prices. Financial derivatives which cannot be classified as hedges are classified as trading derivatives. Further information on hedging derivatives and the effectiveness tests of these instruments can be found in note 5 j) of the Group's consolidated financial statements.

Derivatives with an active market are measured based on the quoted price in that market. If, for exceptional reasons, their quoted price cannot be established on a given date, similar methods to those used to measure financial derivatives not traded in organised markets are used.

Annually, Bankinter Group's board of directors approves the internal risk measurement procedures and limits for each product and market in which the Trading Area operates.

The Market Risks Area, which reports to the Risk Division, independently measures, monitors and controls the Institution's market risks and the limits established by the board. To that end, value at risk (VaR) is calculated using a historical simulation, with a 95% confidence level and a time horizon of one day. This calculation involves an estimate of the potential losses resulting from changes in the value of the Group's positions in financial assets and trading positions, which may occur as a result of changes in factors such as interest rates, exchange rates, credit spreads or stock market prices in the event of the same movements that have occurred in the last 12 months.

This method re-evaluates all trading positions in the different market conditions occurring every day during twelve months before the calculation date. After obtaining the results in economic terms, the scenario corresponding to a 95% confidence interval is taken to establish all the limits.

The VaR limits are approved annually by the board of directors. The use of risk limits during the year remained within and did not exceed the maximum VaR approved. The board of directors and the assets and liabilities committee are periodically informed about the levels of use of these limits, through specific reports.

The following chart details the VaR, by risk factor, of the trading positions at the close of the 2025 financial year, in millions of euros:

<b>VaR by risk factor</b>	
Interest rate VaR	0.56
Equity VaR	0.73
Exchange rate VaR	0.07
Volatility VaR	0.49
<b>Total VaR</b>	<b>0.72</b>

Confidence level 95% and time horizon of one day

When calculating VaR at one day with a confidence level of 95%, the losses incurred in the trading business are expected to remain below VaR in 95% of the days. In order to estimate the losses that could be incurred on the days in which VaR is exceeded, the expected shortfall or conditional VaR is calculated on a daily basis. This VaR provides the estimated average loss in the event any of the scenarios corresponding to the remaining 5% of days were to occur.

The risk measurement models are regularly tested to verify their validity, through backtesting to ensure that they are correctly calibrated. The results of these tests were satisfactory.

### 5.3. Own funds requirements for market risk

Bankinter uses the standardised approach for calculating own funds requirements for market risk, as established by Regulation (EU) 575/2013 (CRR). In accordance with this Regulation, own funds requirements for market risk are the combination of own funds requirements for position risk, for foreign exchange risk and for commodities risk.

As indicated earlier in this chapter, the own funds requirements corresponding to the "Fundamental Review of the Trading Book" (FRTB) review of the CRR (CRR3) have been deferred by the European Commission until 1 January 2027. Therefore, the own funds requirements for market risk are calculated under the previous capital regulations (CRR2).

In 2025, Bankinter had no exposure to commodities risk and its exposure to foreign exchange risk was also very low. Accordingly, under Title IV, Chapter 3 of Regulation (EU) No 575/2013 (CRR), no requirements need to be considered for such risks.

As established in Title IV of Regulation (EU) No 575/2013 (CRR), own funds requirements for position risk are the sum of the own funds requirements for the general and specific risk of its positions in debt and equity instruments in the "Financial assets held for trading" portfolio. General risk is that which derives from a change in value of the portfolio due to general market movements, while specific risk is that which arises from a change in the value of portfolio instruments due to causes relating to the securities issuer or to the issuer of the underlying asset.

Exposure to this type of risk continues to represent a very small percentage of the Group's risk taken as a whole. The amounts of risk-weighted assets and the own funds requirements for each type of instrument at 31 December 2025 were as follows:

#### Market risk under the standardised approach (MR1)

		a
		Amount of risk-weighted exposure
<b>Outright products</b>		
1	Interest rate risk (general and specific)	337,966
2	Equity risk (general and specific)	15,803
3	Exchange rate risk	–
4	Commodity risk	–
<b>Options</b>		
5	Simplified approach	–
6	Delta-plus method	2,320
7	Scenario approach	–
8	Securitisation	–
9	<b>Total</b>	<b>356,089</b>

Figures in thousands of euros

Capital requirements for market risk have increased compared to the close of the previous financial year, following the performance of the markets and the trading book. There were no changes made to the calculation methodology used during the year.

Under Article 351 of Regulation (EU) No 575/2013 (CRR), as amended by Regulation (EU) No 2024/1623 (CRR3), own funds requirements for exchange rate risk may be considered null when the sum of the net global positions in foreign currencies and gold does not exceed 2% of eligible own funds. As the Group does not hold any gold positions and the foreign exchange position is very low (below the 2% threshold established in the Regulation), there are no shareholders' equity requirements to be considered in relation to this risk.

06

## Operational risk



## 6. Operational risk

Operational risk is defined as the possibility of financial losses due to failures in internal procedures, personnel or systems, or as a result of external events, including but not limited to legal risk, model risk and information and communication technology risk.

### 6.1. Management of operational risk

#### 6.1.1. Risk management policies and objectives

Bankinter's operational risk management model brings together the best sector practices, as shared in the Spanish Operational Risk Consortium (Consortio Español de Riesgo Operacional, CERO), an experience-exchange group comprising the main banks operating in Spain.

With a view to achieving an efficient system for managing operational risk, Bankinter has established the following basic principles of action:

- Management aimed at preventive mitigation of the greatest operational risks.
- Decentralised management model so that the responsibility for managing risks falls upon a first level at the respective business and support units.
- Regular review of the situations and levels of operational risk management at each unit through analysis.

These principles are set out in Bankinter Group's 'Risk management and control framework', previously approved by the board of directors.

#### 6.1.2. Operational risk control and management function structure and organisation

Bankinter's operational risk governance structure is based on the following main elements:

##### Support areas and business units

The area and business unit managers are responsible for managing operational risk in their respective centres. Their duties include the following:

- Managing the unit's operational risks and, specifically, identifying, assessing, controlling and mitigating the risks on which they have the capacity to act.
- Recording and managing operational risk events, as well as reporting operational losses.
- Studying, defining, prioritising and financing mitigation plans for operational risks.
- Maintain and test the business continuity plans for which they are responsible.

##### Operational Risk Unit (ORU)

The functions of this unit, which is part of the Risk Division, are as follows:

- Promoting the management of operational risks in the areas and units, encouraging risk identification, allocation of responsibility, establishment of controls, generation of indicators, drawing up of mitigation plans and the action to be taken in case of new significant losses or risks.
- Facilitating the methodologies, tools and procedures necessary for managing operational risk.
- Ensuring that operational losses are correctly and accurately recorded.
- Providing the organisation with a uniform vision of operational risk exposure.
- Proposing changes in the operational risk management framework.

##### Product and operational risk committee

Operational risks are regularly reported and monitored in the product and operational risk committee, where the following functions are carried out:

- Presenting and analysing the information and trend in operational losses.
- Analysing the self-assessment exercises that have been carried out.
- Monitoring operational risk appetite metrics.

##### Control and Compliance division

As a second line of defence, the main objective of the Control and Compliance division is to guarantee the effective control of all types of risks at the company, including operational risk. To that end, the unit ensures that the corresponding management frameworks, policies, procedures and internal and external regulations are properly followed.

##### Internal audit

On an annual basis, Internal Audit reviews and assesses the operational risk management framework, its adaptation to current legislation and the effectiveness and impact of its implementation.

##### Risk and compliance committee

This committee is a delegate committee of the board of directors. It performs supervisory duties in relation to risks and is, therefore, responsible for monitoring the Group's risk policies and management and control framework, which is approved by the board of directors on the proposal of the risk and compliance committee, and for monitoring the RAF objective and limits for the operational risk Bankinter Group is willing to assume at any time.

The risk and compliance committee is responsible for oversight of the organisational culture and structure needed to promote efficient management of operational risk at Bankinter.

### 6.1.3. Coverage and nature of the measurement system

Among other elements, operational risk management is based on the following:

- Risks are identified and assessed through the development of risk maps, in which the significance of all risks is estimated, and also an appropriate assessment of their control environments.
- Record of loss events occurring in the Group. The loss database contains quantitative information on economic losses generated as a result of operational risk events occurring in recent years. It classifies and keeps a record of operational losses, generating the historic information necessary to examine trends, evaluate potential correlations with indicators, and validate the effectiveness of the mitigation plans implemented. This database contains all loss events without minimum thresholds.
- Execution of corrective actions, requesting incident analyses and corrective measures from responsible units for all loss events exceeding 6,000 euros.
- Risk tracking through key indicators. These indicators are a series of data on the situation or performance of aspects related to the structure, procedures and activities of the Group from which to draw conclusions with a view to predicting or correcting future situations.
- Generation and dissemination of management information suited to the needs of each governing body that has responsibility for operational risk management.

### 6.1.4. Coverage and nature of the information framework for operational risk

Information on management appropriate to the needs of each governance body responsible for management of operational risk is generated and disseminated regularly, including the following information:

- Each month, a "Monthly operational risk bulletin" is distributed to the organisation with information on the current situation, the performance of losses, risk assessments, risk indicators and other relevant information. On a monthly basis, the most relevant operational loss data is presented to the management committee.
- The most significant data on operational losses, self-assessments and other operational risk issues are presented to the products and operational risk committee.
- The main data relating to the management and control of operational risks is presented quarterly to the board's risk and compliance committee, highlighting operational losses and their performance, self-assessments of risks and controls, and regulatory changes and updates that impact the risk management framework.

- As part of the management system for the "Risk Appetite Framework", operational risk metrics are presented quarterly, together with those corresponding to the entity's other risks.

### 6.1.5. Policies and strategies for risk reduction and risk coverage

Bankinter has a corporate insurance programme to deal with its risks, including operational risk. The programme covers various risks, the most notable of which are the following.

- Property damage insurance.
- General liability insurance.
- Third-party liability insurance for directors and executives.
- Cyber risk and data protection liability insurance.
- Comprehensive bank insurance (theft, employee breach of trust, etc.).
- Professional indemnity insurance for various sensitive areas of practice.

This programme is reviewed annually, always taking into account the identification and assessment of operational risks. The decision to hedge depends on a number of factors such as the level of exposure, tolerance and risk appetite at the time.

## 6.2. Operational risk losses

The following table details operational risk losses for the last ten years, calculated in accordance with Regulation (EU) No 575/2013, including amounts net of recoveries and exclusions for the entire consolidation scope. The information is displayed using the two thresholds defined in the Regulation: €20,000 and €100,000. As shown in table OR1, at December 2025, no operational risk losses had been excluded in the last ten years for either threshold.

## Operational risk losses (OR1)

	a	b	c	d	e	f	g	h	i	j	k	
	2025	2024	2023	2022	2021	2020	2019	2018	2017	2016	Ten-year average	
<b>Using a €20,000 threshold</b>												
1	Total amount of operational risk losses net of recoveries (excluding exclusions)	49,450	54,887	50,419	84,049	101,838	126,739	143,999	142,863	91,846	29,212	87,530
2	Total number of operational risk losses	2	2	2	3	3	3	4	2	1	–	2
3	Total amount of excluded operational risk losses	–	–	–	–	–	–	–	–	–	–	–
4	Total number of excluded operational risk events	–	–	–	–	–	–	–	–	–	–	–
5	Total amount of operational risk losses net of recoveries and excluded losses	49,450	54,887	50,419	84,049	101,838	126,739	143,999	142,863	91,846	29,212	87,530
<b>Using a €100,000 threshold</b>												
6	Total amount of operational risk losses net of recoveries (excluding exclusions)	48,439	56,603	36,697	47,463	82,859	75,800	57,576	56,788	38,744	17,784	51,875
7	Total number of operational risk losses	1	–	1	1	1	1	1	1	–	–	1
8	Total amount of excluded operational risk losses	–	–	–	–	–	–	–	–	–	–	–
9	Total number of excluded operational risk events	–	–	–	–	–	–	–	–	–	–	–
10	Total amount of operational risk losses net of recoveries and excluded losses	48,439	56,603	36,697	47,463	82,859	75,800	57,576	56,788	38,744	17,784	51,875

Figures in thousands of euros

### 6.3. Methods for calculating and assessing operational risk

Bankinter Group calculates exposures weighted by operational risk using the standardised approach in accordance with Chapter 1, Title III, of Regulation (EU) No 575/2013, as amended by Regulation (EU) No 2024/1623 (CRR3), as well as regulatory technical standard EBA/RTS/2025/02, Final Report on Business Indicator-related mandates for Operational Risk.

The Group meets all the requirements for applying this approach, as established in the applicable regulations: its operational risk management and evaluation system is integrated in the management of Group activity, and senior management is regularly apprised of operational risk in the entity. Operational risk management is described in the following section.

To estimate own funds requirements for operational risk, the Group distributes its income based on the business lines foreseen in the Regulation, applying the corresponding weighting. Total requirements are calculated as the average of own funds requirements for operational risks in the past three years.

Regulation (EU) 2024/1623 (CRR3), which amends Regulation (EU) 575/2013 (CRR), introduced a substantial change to the calculation of operational risk requirements, among other things. With regard to the operational risk management framework, it is decided to replace the three existing methods for estimating capital requirements (basic, standard and advanced) with a single non-model- based method, newly designated as the standardised approach. These changes have been applied since 1 January 2025, so Bankinter adapted its management framework for operational risk to comply with the new regulatory requirements in the first quarter of 2025.

## 6.4. Risk-weighted exposure and operational risk capital charge

The capital requirements for operational risk and risk exposure at year-end 2025 are shown in the following table:

### Own funds requirements for operational risk and risk-weighted exposure amounts (OR3)

	a
1 Business Indicator Component (BIC)	465,354
EU1 Own funds requirements under the alternative standardised approach (ASA) (OROF) pursuant to Article 314 (4)	0
2 N/A	
3 Minimum operational risk own funds requirements (OROF)	465,354
4 Amounts of operational risk exposure (REA)	5,816,919

Figures in thousands of euros

The calculation of own funds requirements for operational risk established by CRR3 is based on identifying the components of the entity's Business Indicator Component (BIC), which is the sum of the following components, the calculation of which is in turn defined in the Regulation:

- The interest, leases and dividends component.
- The services component.
- The financial component.

This takes into account the elements that must be excluded and the adjustments that must be made to the BIC, as established in articles 314 and 315 of CRR3 and the EBA/RTS guidelines.

The elements of the calculation are obtained from the bank's own accounting information, based on the mapping established in the EBA/RTS guidance between the items that make up these elements and the Group's financial statements, specifically with certain Finreps that are specified in the guidance. The calculation of these components considers accounting data from the last three years when the EBA guidance specifies this.

Details of the components and subcomponents of the BIC activity indicator are shown in Table OR2 below.

### Activity indicator, components and subcomponents (OR2)

	a	b	c	d
	2025	2024	2023	Average
<b>Activity indicator, components and subcomponents</b>				
1 Interest, lease and dividend components (ILDC)				2,230,118
EU 1 The ILDC of the individual entity or the consolidated group (excluding entities considered in Article 314(3))				2,230,118
1a Interest and lease income	3,891,312	4,417,736	3,682,927	3,997,325
1b Interest and lease expense	1,678,526	2,167,419	1,511,873	1,785,939
1c Total assets/Asset component	122,011,975	120,571,625	111,990,165	118,191,255
1d Dividend income/Dividend component	25,838	15,100	15,261	18,733
2 Services component				1,036,767
2a Fee and commission income	1,006,197	927,271	817,989	917,152
2b Fee and commission expense	204,511	203,056	194,117	200,561
2c Other operating income	36,996	31,559	31,584	33,380
2d Other operating expenses	129,067	115,350	114,428	119,615
3 Financial component				35,471
3a Net gains applicable to the trading book (TB)	6,451	13,561	8,347	9,453
3b Net gains applicable to the banking book (BB)	25,731	25,120	27,203	26,018
EU 3c Method used to determine the TB/BB limit (Prudential Boundary Approach - PBA)				
4 Activity indicator (BI)				3,302,357
5 Business indicator component (BIC)				465,354

Figures in thousands of euros

#### Disclosure of information about the BI:

	a
6a BI without deduction of excluded transferred activities	3,302,357
6b Reduction in the BI due to excluded transferred activities	0
EU 6c Impact of mergers/acquisitions on the BI	0

## 07

Equity investments  
and capital  
instruments not  
included under  
'Assets held for  
trading'



## 7. Equity investments and capital instruments not included under 'Assets held for trading'

### 7.1. Distinction between portfolios held for sale and for strategic purposes

Equity exposures not included in the "Financial assets held for trading" portfolio are included in the "Financial assets not held for trading mandatorily valued at fair value through profit or loss" portfolio, in the "Fair value through other comprehensive income" portfolio and in the "Investments" portfolio. The accounting treatment for these portfolios is disclosed in Note 5 g) of the notes to the annual consolidated financial statements.

#### 7.1.1. Portfolio at fair value through profit or loss

This portfolio corresponds in an accounting sense to the category 'Non-trading financial assets mandatorily at fair value through profit or loss', for which the business model is not trading.

In this case, it includes financial assets not held for trading but that must be valued at fair value through profit or loss as they do not meet the cash flow criterion. This portfolio includes the capital instruments of entities not classified as subsidiaries or associates and not classified as "Financial assets held for trading".

#### 7.1.2. Portfolio at fair value through other comprehensive income

In accounting terms, the portfolio corresponds to the category of Financial Assets at fair value with changes in other comprehensive income. The capital instruments in this portfolio have been permanently assigned so that any changes in their performance can be recognised in other comprehensive income under equity.

Under this designation, the capital instruments will not contribute to profit or loss due to impairment or market fluctuations while they remain in the portfolio but all changes will be recognised in other comprehensive income, including any future disposal of these instruments.

This portfolio may only include capital instruments of entities not classified as subsidiaries or associates and not classified as "Financial assets held for trading".

#### 7.1.3. Portfolios held for strategic purposes

This portfolio is included, for accounting purposes, within the investments portfolio.

A capital instrument is considered a strategic investment when it has been made with the purpose of maintaining an operating or commercial relationship through any of the following situations, but not to exercise significant influence over the investee:

- Representation on the board of directors or equivalent body of the investee.

- Participation in policy setting processes.
- Exchange of senior management.
- Existence of significant transactions between investor and investee.
- Provision of essential technical information.

### 7.2. Accounting principles and measurement of instruments

Capital instruments assigned to the investment portfolio are accounted for on the balance sheet using the equity method.

Capital instruments included in the portfolio of 'Non-trading financial assets mandatorily at fair value through profit or loss', must be recognised as such both at initial and subsequent measurement.

The financial assets at fair value through other comprehensive income portfolio is measured at fair value and all activity is recorded under the other comprehensive income heading of net equity.

The best evidence of fair value on initial recognition is the price quoted on an active, transparent and deep market. When there is no market price, valuation techniques must be used to estimate the fair value. The characteristics of these are described in note 5.g to the Group's financial statements. .

For subsequent measurement, the following methods will be used based on the fair value hierarchy:

- 'Level 1' of the hierarchy includes data on financial instruments whose fair values are obtained from prices quoted in active markets for identical instruments; i.e. without modification or reorganisation.
- 'Level 2' includes data on financial instruments whose fair value is obtained from prices quoted in active markets for similar instruments or other valuation techniques where all significant inputs are based on observable market data.
- 'Level 3' includes information on financial instruments the fair values of which are obtained from valuation techniques which have some significant input that is not based on observable market data.

Note 43 to the consolidated financial statements discloses the fair value of these capital instruments and the valuation method based on their fair value hierarchy.

For equities traded on official markets, there is no difference between the carrying amount, the fair value and the quoted value.

### 7.3. Carrying amount of equity investments and capital instruments

The carrying amounts of the main equity investments and capital instruments not included in the portfolio of financial assets held for trading, according to the group's reserved consolidated financial statements for prudential purposes, are shown below:

#### Equity investments and capital instruments in associates and Group companies

	Non-trading financial assets mandatorily at fair value through profit or loss	Financial assets at fair value through other comprehensive income	Investments			Total
			Associates	Jointly controlled entities	Subsidiaries	
2024	281,048	205,473	76,207	124,698	—	687,426
2025	323,616	211,918	78,689	119,795	—	734,018

Figures in thousands of euros

The following chart shows the accounting balances of equity investments and capital instruments not included in the trading book, by type of instrument:

#### Listed and unlisted capital instruments

	Carrying amount	
	2025	2024
Listed instruments	427,930	393,328
Unlisted instruments	306,088	294,098
	734,018	687,426

Figures in thousands of euros

The Group recorded earnings of 13,807 thousands euros in 2025 and 5,571 thousands euros in 2024 from the portfolio of capital instruments not held for trading and designated at fair value through profit or loss, as detailed in Note 30 of the consolidated financial statements of Bankinter Group.

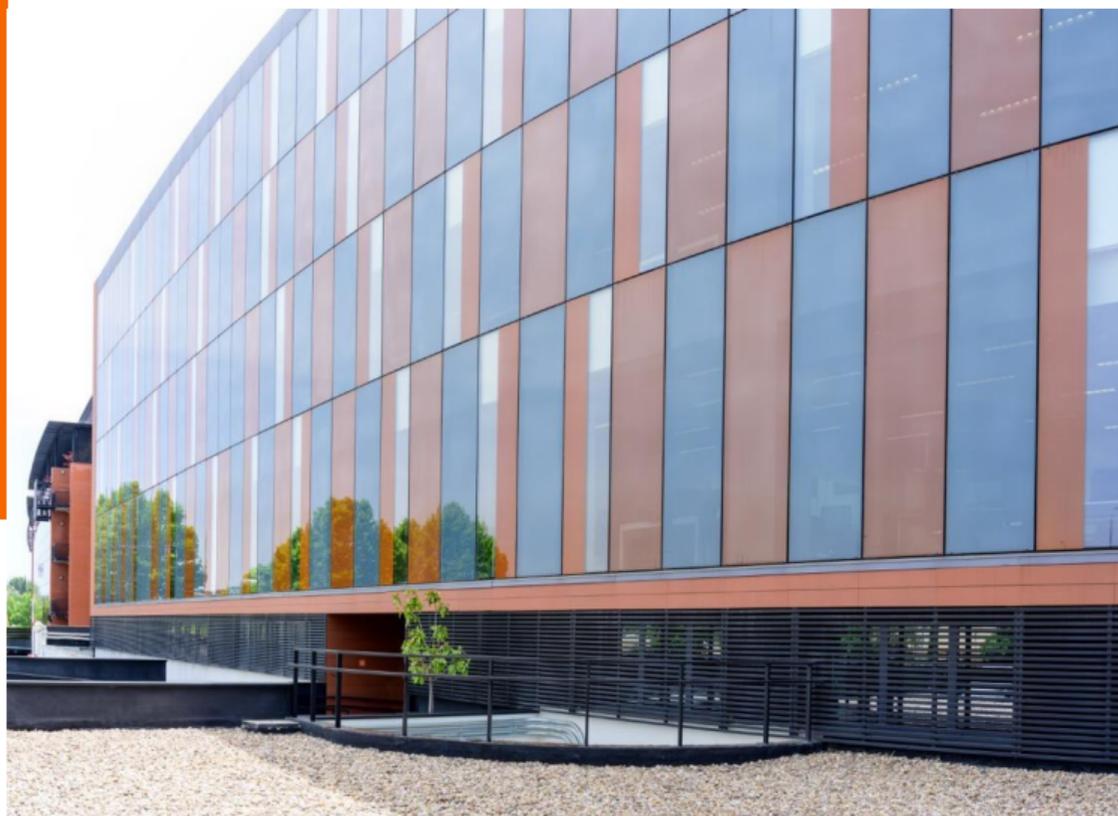
The portfolio at fair value with changes in other comprehensive income does not impact the profit and loss account for holding capital instruments with this designation.

Bankinter Group has been authorised by the supervisor to permanently apply the standardised approach to equity-related exposures, except for financial-sector investments in which the bank holds a significant (as is the case of the bank's insurance holdings) or non-significant stake. Anything exceeding the 10% CET1 threshold must be deducted, not giving rise to deductions for this concept at 31 December 2025.

Risk-weighted capital instruments and equity investments, including the amount of investments in financial institutions below 10% of CET1, stood at €726,517 thousand euros at the close of the 2025 financial year, compared to €704,195 thousand euros at the end of 2024.

08

Structural interest  
rate and foreign  
exchange risk



## 8. Structural interest rate and foreign exchange risk

### 8.1. Interest rate risk of positions not included in the trading book

#### 8.1.1. Scope and governance of structural interest rate risk

Details of the governance and policies for managing this risk are provided in Note 44 to the Group's consolidated financial statements.

Structural interest rate risk (IRRBB) reflects the current or potential risk to an institution's profit or economic value arising from adverse interest rate movements affecting interest rate sensitive instruments.

In accordance with current EBA regulations and, in particular, with the "Guidelines on the management of interest rate risk arising from non-trading book activities" (GL-EBA: 2022-14 of 20 October 2022), structural interest rate risk is the current and future risk of a negative impact on the economic value of the bank's economic value or net interest income, considering any variations in market value arising from adverse movements in interest rates that affect interest rate sensitive instruments. This encompasses mismatch risk, basis risk and optionality risk. Thus, structural interest rate risk is confined exclusively to non-trading book activities, excluding the risk arising from positions of a speculative nature in the trading book, provided that this risk is measured and managed by other risk measures.

Bankinter Group's management of this (structural) interest rate risk, which is inherent in the fluctuations of interest rates on the financial markets and is caused by the asymmetry of maturities and the time lag in the repricing of the asset and liability transactions corresponding to the banking book of financial institutions, is the ultimate responsibility of the **board of directors**, which delegates the ordinary management of this to the **assets and liabilities committee (ALCO)** and its management team. In any event, in accordance with its Regulations, the board of directors retains the general supervision of this risk, accepting and exercising directly and without delegation the responsibilities that this function entails. The board of directors annually reviews, approves and delegates to the assets and liabilities committee the limits applicable to the management of this risk, together with those of the rest of the structural risks.

The principles, strategies and practices for managing this risk are set out in the **Risk Control and Management Framework**, the **Risk Appetite Framework**, the **Corporate Risk Map** and the **Structural Interest Rate Risk Management Framework**, all of which have been approved by the board of directors, and the documents that develop them.

The bank's main objective in the management of interest rate risk is to harmonise its overarching objective of maximising profitability - through the generation of income mostly from commercial retail banking - with the control of this exposure to market interest rates.

This exposure to interest rate risk is reduced by developing a dynamic and efficient risk mitigation and diversification policy.

The management and control of structural interest rate risk is organised through a clear separation of roles and responsibilities, the ultimate objective of which is to ensure the recurring generation of net interest income and to maximise the economic value of equity. The main areas involved in managing this risk are: Balance Sheet Financial Management, Balance Sheet Analysis, Market Risk, Risk Control, Internal Validation and Audit.

#### 8.1.2. General structural strategies for managing and controlling structural interest rate risk

The existence of adequate internal risk control policies is essential for the optimal management of interest rate risk. They ensure that the company does not take undesirable risks beyond the risk appetite set by the board of directors and reflected in the **Group's current Risk Appetite Framework**.

The key policies developed at Bankinter in relation to the risks described above are as follows:

- **Robust organisational and functional structure.** The Bank has an appropriate organisational structure to ensure the soundness of the control and management of structural interest rate risk. This structure is consistent with its size, complexity, risk appetite and business model. Additionally, the responsibilities and duties assigned to each participant in the management of this risk are clearly established and identified.

In line with best practises in risk management, Bankinter Group guarantees the independence and separation of responsibilities by incorporating the 3 lines of defence model in the management of this risk. Thus, the Group's structural interest rate risk management model (IRRBB) is divided into three lines of defence:

1. First line: management is developed in the areas of business and risk support. This line includes the **Balance Sheet Management**, **Balance Sheet Analysis** and **Market Risk** units.
2. Second line: consists of the Risk Control and Internal Validation Unit.
3. Third line: performed by Internal Audit:

- **Appropriate measurement of interest rate risk.** The Group develops various measurement methodologies and applies them to different scenarios of interest rate curve behaviour. Section 8.1.3 of this report provides details on the methods used and the key behavioural assumptions. The various measurement methods and assumptions used are documented, together with details of the key operational and control processes required to develop them.

In addition, section 8.1.4 of this report identifies the **regulatory** interest rate shock scenarios used.

- **Optimal control of the risk accepted.** The company has a specialised ALM tool for measuring and controlling interest rate risk.

This policy extends to the articulation of the appropriate **technical** and **data management architecture** that makes it possible to include the bank's entire balance sheet, specifically those positions that are sensitive to interest rate risk, including interest rate derivatives, both implicit and explicit. According to the EBA Guidelines, institutions with a non-performing exposures (NPE) ratio of 2% or higher must also include them, net of provisions, as general instruments sensitive to interest rates.

It also extends to the establishment of suitable interest rate risk control structure that allows the establishment of **interest rate risk mitigation techniques**, such as the arrangement of (accounting and/or economic) hedges through swaps and other interest rate derivatives (for example, futures).

- **Ongoing analysis of current and future interest rate risk.** The Group analyses its current and future exposure to the various interest rate curves and the composition of the balance sheet, and identifies the Group's strengths and weaknesses by analysing the financial information and other qualitative aspects thereof, etc.

This information is analysed in detail by the assets and liabilities committee (ALCO), which is responsible for setting guidelines for interest rate risk.

- **The competent bodies of the Group are informed of the level of risk incurred.** The level of interest rate risk is regularly reported to the risk committee, the assets and liabilities committee (ALCO), senior management and other areas of the organisation.

This principle also extends to the information needs of other agents: regulators (ECB and/or Bank of Spain), internal and external auditors and rating agencies, if applicable.

### 8.1.3. Methods of measurement. Assumptions

Bankinter Group regularly monitors its interest rate risk and seeks to anticipate problematic situations or identify potential deviations that could result in losses to the Group's estimated net interest income and/or net asset value.

The Group has an integrated process for communicating this risk internally, which allows for regular monitoring of the risk in different governing bodies:

- Monthly reports to the **ALCO**.
- Reports to the **risk committee**, according to its calendar of sessions, where the IRRBB metrics incorporated into the current Risk Appetite Framework (RAF) are reported.
- Reports to the **board of directors**. Matters brought to the attention of the risk committee are reported and, if necessary, approval is sought.

Exposure to structural interest rate risk is measured on two levels:

- **Net interest income (NII) sensitivity.**

Over a given time horizon, normally short-term and generally not exceeding 12 months, the Group analyses the expected variation in the net interest margin<sup>2</sup> of the base scenario compared to scenarios that reflect disturbances in interest rate curves. This movement in interest rates affects net interest income, both through the repricing of future cash flows and through the different profitability resulting from the reinvestment of past due positions.

The reduction in the estimated margin or the increase in financing costs may threaten the short-term financial stability of the Group or weaken the confidence of other agents (investors, customers, etc.) in the Group, which is why this is an approach to control short-term interest rate risk.

- **Sensitivity of the economic value of equity (EVE).**

This ratio is related to the changes in the discounted equity (economic value) of the individual interest-sensitive items in the balance sheet in the event of changes in interest rates.

This sensitivity is mainly influenced by the new discount factors that apply in each adverse scenario, but also by the determination of the new future cash flows for assets with variable yields. This metric for measuring interest rate risk provides information on the long-term interest rate risk.

- **Earnings Sensitivity**

Paragraph 14 of the EBA's IRRBB guidelines (EBA/GL/2022/14) indicates that the net interest income upon which to calculate the impact of interest rate or credit spread movements should be determined by interest income and expenses. For these purposes, institutions should also consider market value changes of instruments, depending on accounting treatment, either shown in the profit and loss account or directly in equity (e.g. via other comprehensive income). This is what is known as "earnings".

This metric aims to determine whether the interest risk exposure resulting from activities other than those of the bank's trading book (IRRBB) are at acceptable levels that allow maintaining normal business operation levels and, therefore, avoid potential excess exposure to this risk.

Bankinter Group incorporates the measurement of this metric in accordance with the guidelines and monitors it within the Risk Appetite Framework.

<sup>2</sup> Net interest income (NII): Interest income received - interest expense paid.

In both cases, the calculation of these metrics requires a specific ALM tool that includes all positions on the company's interest rate sensitive balance sheet and allows the projection of their future flows depending on the type of instrument, its contractual characteristics and the different interest rate scenarios. The purpose of these projections is to simulate net interest income (NII) and the economic value of the bank's equity (EVE).

The projection of future flows requires the modelling of **behavioural assumptions** for specific balance sheet items, such as the maturity date of demand deposits, the rate of early repayment of mortgage loans and the early redemption of term deposits.

The Group has internal models for demand deposits and mortgage loan prepayment risk based on its historical behaviour. In both of these models, the Group has internal documents containing the modelling assumptions that apply to the measurement of IRRBB in terms of economic value (EVE) and earnings (NII), including the changes in assumptions<sup>3</sup> to be considered under the various interest rate shock scenarios.

These models have been approved by the extended models committee with prior Internal Validation approval and follow EBA recommendations. In particular, the internal demand account model establishes the maximum average maturity limit (5 years) on accounts without maturity, as defined in Art. 111 of "Guidelines on the management of interest rate risk and credit spread risk arising from non-trading book activities" (GL-EBA: 2022-14 to 20 October 2022).

### 8.1.4. Regulatory scenarios for interest rate shocks

In its RTS SOT 2022-10 guide, the EBA defines six interest rate shock scenarios for each currency considered significant for interest rate risk purposes and the overall parameters of each supervisory scenario:

- Parallel-up movement;
- Parallel-down movement;
- Positivation or falling of short-term rates and rising of long-term rates [Steepener];
- Flattening or rising short-term rates and falling long-term rates [Flattener];
- Short rates up; and
- Short rates down.

According to this guide, entities must calculate the impact of regulatory disturbances in interest rates on their Economic Value of Equity (EVE), at least quarterly.

The regulations apply a quantitative regulatory threshold for this metric of a 15% limit on the sensitivity of economic value with respect to the bank's tier 1 capital in any of the six scenarios. In this case, the competent authority may, if it deems it appropriate, exercise the supervisory measures in article 104 (1) of Directive 2013/36/EU.

<sup>3</sup> Assumptions on the pace of early repayments of mortgage loans and/or the behaviour of demand deposits are subject to interest rate shock scenarios.

In the case of 12-month net interest income (NII), the prudential requirement only covers the two parallel scenarios (up and down). The new IRRBB regulations include a quantitative threshold of a 5% limit on the sensitivity of net interest income with respect to the bank's tier 1 capital.

The regulations include a new limit (minimum interest rate) for interest rate shocks in lower interest rate scenarios based on the term for each currency. In the case of the euro, the lower limit is -150 basis points, increasing by 3 basis points per year to 0% for maturities of 50 years or longer.

### 8.1.5. Current exposure to structural interest rate risk: supervisory approach

The following table shows the sensitivity of the Economic Value of Equity (EVE) and the Net Interest Margin (NII) of Bankinter Group to the regulatory scenarios identified in section 8.1.4 as of 31 December 2025:

#### Interest rate risk of positions not held in the trading book (IRRBB1).

Regulatory shock scenarios	Changes in the economic value of equity (1)		Changes in net interest income (1)	
	Q4 2025	Q4 2024	Q4 2025	Q4 2024
1 Parallel-up movement	-7.2%	-6.6%	-3.1%	-2.0%
2 Parallel-down movement	0.8%	-1.0%	-3.3%	-2.6%
3 Positivation	7.9%	8.2%		
4 Flattening	-9.4%	-9.6%		
5 Short rates up	-10.7%	-10.1%		
6 Short rates down	11.0%	10.5%		

#### Notes:

(1) Changes in the economic value of equity =  $\Delta \text{EVE} / \text{TIER 1}$  (%) | Changes in net interest income =  $\Delta \text{NII 12M} / \text{TIER 1}$  (%)

The interest rate risk figures as at end-December 2025 reflect:

- Bankinter's exposure to structural interest rate risk is within the regulatory and internal (risk appetite framework) limits.
- The most unfavourable scenario for the NII metric is the regulatory scenario of a parallel decline in interest rates. Both adverse scenarios have negative sensitivity, due to the asymmetry in the application of assumptions about the behaviour of the balance sheet in response to the changes described in the regulatory scenarios.
- NII's net sensitivity to the rate cut scenario is due to the lower projected interest margin on variable-yield asset positions in this scenario. This negative sensitivity is mitigated by the lower cost of financing in liability positions. However, in the event of

falling interest rates, the entity does not expect to change the cost of financing non-interest-bearing accounts, leaving this at 0%. The net impact of this scenario shows a decrease in the net interest margin of slightly more than 3.3% of the entity's tier 1 capital.

- The fall in market interest rates over the very short term (<1 year) in 2025 led to the Group's balance sheet being positioned to preserve the generation of financial income in the base scenario. The performance of the regulatory sensitivity of net interest income (NII) in Bankinter Group in 2025 was in line with expectations, at low levels compared to the entity's gross net interest income.
- In the case of the economic value metric, the short-term interest rate increase scenario became the most adverse scenario from the beginning of 2024, mainly as a result of the Group's positioning in a probable scenario of stable interest rate in the market.
- The greater negative sensitivity in this interest rate increase scenario is due both to the increased exposure and duration on the asset side (particularly in the mortgage book and the ALCO portfolio) and to the gradual reduction in the maturity of liabilities resulting from their new composition (migration of low-yielding sight balances to interest-bearing accounts and, to a lesser extent, term deposit). Note that, in the case of asset positions, their Economic Value is reduced by discounting their future cash flows at higher discount rates.
- The performance of the regulatory sensitivity of economic value (EVE) in the adverse scenario in 2025 shows stable behaviour due to active risk management of these new exposures, despite being impacted by the shorter maturity of the Group's financial liabilities, due to both its new composition and to the application of regulatory restrictions on the maturity of current accounts.

### 8.1.6. Internal scenarios for interest rate shocks

Based on the EBA guidelines, various management scenarios have been defined to capture all of the interest rate risks in Bankinter: repricing, basis and optionality risk. The entity has specific scenarios for the sensitivity of net interest income and economic value. These scenarios have been presented to the ALCO and approved.

Sensitivity scenarios for net interest income:

- Parallel-down movement in rates of 100 bp
- Parallel-up movement in rates of 100 bp
- Parallel-down movement in rates of 200 bp
- Parallel-up movement in rates of 200 bp
- Gradual up movement in rates of 200 bp
- Gradual down movement in rates of 200 bp
- Parallel-down movement in rates of 100 bp over 24 months

- Parallel-down movement in rates of 100 bp over 24 months

Sensitivity scenarios for economic value:

- Parallel-down movement in rates of 100 bp
- Parallel-up movement in rates of 100 bp
- Parallel-down movement in rates of 200 bp
- Parallel-up movement in rates of 200 bp
- Flattening of the slope of 100 bp
- Positivation of the slope of 100 bp

Scenarios with greater stress (200 bp) have been added for both metrics, in line with the historical analysis of interest rate movements. Additionally, 24-month scenarios have been added to net interest income to broaden the horizon of results management.

Two scenarios with progressive interest rate changes have been added, which focus on the measurement of repricing risk on net interest income, and two further scenarios with a change in the slope of the yield curve, which impact the sensitivity of economic value.

### 8.1.7. Current exposure to structural interest rate risk: internal management approach

At year-end 2025, the results of the sensitivity of net interest income and economic value to the scenarios was:

Sensitivity of net interest income		EVE sensitivity	
-100 bp parallel	-3.6%	-100 bp parallel	-1.4%
+100 bp parallel	+2,5%	+100 bp parallel	+0,5%
-200 bp parallel	-7.1%	-200 bp parallel	-4.5%
+200 bp parallel	+5,1%	+200 bp parallel	+5,9%
Gradual fall 200 bp	-2.6%	Positivation 100 bp	+1,1%
Gradual rise 200 bp	+1,9%	Flattening 100 bp	-1.4%
-100 bp parallel at 24 M	-7.8%		
+100 bp parallel at 24 M	+6,8%		

## 8.2. Exchange rate risk

### 8.2.1. Management of structural foreign currency risk

The structural exchange rate risk on the balance sheet derives from investment positions and funds that are denominated in foreign currency. The aim of managing this risk is to limit the possible negative impact of exchange rate fluctuations on the Bank's margins and equity.

The Balance Sheet Management area, part of the Treasury and Capital Markets area, establishes the management and hedging policies for exchange rate risk. The Group's policy is to hedge all balance sheet positions, so that the number of open positions in each of them is kept to a minimum.

The risk of operating with assets and liabilities in other currencies before hedging would be defined by:

- The percentage depreciation of a currency if a long position (more assets than liabilities in that currency) is taken.
- The percentage appreciation of a currency if a short position (more liabilities than assets) is taken.

The Liquidity desk, within the Balance Sheet Management area, is responsible for exchange rate hedging. It receives information on a daily basis about the position in each of the currencies and the expected movements. The positions are then hedged in light of the resulting balances, either by placing surpluses on the market or taking negative positions. These hedges are carried out either through spot transactions or FX swaps.

Therefore, the structural exchange rate risk is managed on a daily basis, minimising the impact that an adverse movement in exchange rates could have on the Group's results. Additionally, a second level control is carried out by the Financial Control department on the positions in each of the currencies.

The currency positions generated by trading activities are also managed by the Currency Desk, but their measurement is included in the monitoring of the rest of the market risks.

09

## Liquidity and funding risk



## 9. Liquidity and funding risk

### 9.1. Governance and monitoring of funding and liquidity risk

Note 44 of the Group's notes to the consolidated financial statements contains detailed information on the governance and management of structural liquidity risk.

Structural liquidity risk is associated with the financial institution's capacity to handle the payment obligations it takes on and to fund its investment business. Bankinter Group actively monitors liquidity and its forecasts as well the measures to take either under normal market conditions or in exceptional situations resulting from external causes or market behaviour.

The management of this risk is the responsibility of the ALCO by delegation of the board of directors.

The principles, strategies and practices for liquidity management are set out in the 'Liquidity planning framework' that is approved by the board of directors.

The primary goal of managing liquidity risk is that Bankinter Group maintains enough funds to cover all its commitments over a long period of time in any market conditions.

Fulfilment of this objective is subject to the following restrictions:

- Maintaining a reduced reliance on wholesale markets to fund operations through balanced growth in loans and retail funds.
- Diversifying wholesale funding sources, both from the point of view of instruments and markets.
- Maintaining a customer funding gap, which is a metric that indicates the part of the annual financial statements funded by retail funds, which means maintaining the "Loan to Deposits" (LTD) ratio below 120%.
- Maintain a presence in wholesale markets, issuing on a regular basis in accordance with market opportunities and needs.
- Offering maximum transparency to investors, by regularly providing information about the Bank.
- Having an appropriate wholesale maturity profile, avoiding concentrations.
- Maintaining a sufficient buffer of liquid assets to cover a possible shutdown of wholesale markets or other scenarios considered in the stress tests.

The metrics defined to assess liquidity risk are described and structured in the Risk Appetite Framework at two levels, depending on whether they are metrics related to the main risks of the business or those that directly impact profitability, capital and liquidity. In this case, they would fall into Level 1, while Level 2 applies to those that extend Level 1 information or do not directly impact the company's risks:

#### Tier 1

##### a) Liquidity coverage ratio (LCR)

Stock of high-quality liquid assets that covers net cash outflows over a 30-day period.

##### b) Deposit to Loan (DtL)

Ratio of net lending to stable customer deposits, ensuring that there are suitable levels of self-funding of loans in the balance sheet at all times.

##### c) Total liquidity buffer (first + second liquidity line)

Amount of assets that can be easily liquidated in order to cover any liquidity needs, including the issuing capacity of covered bonds.

#### Tier 2

##### a) ECB financing

The total amount of financing through the European Central Bank (ECB) net of balances deposited in accounts at the ECB.

##### b) Short-term wholesale funding ratio

Short-term wholesale funding as a percentage of total wholesale funding.

##### c) Wholesale funding with maturity of less than 12 months as a percentage of liquid assets

Wholesale funding with maturity of 12 months as a percentage of the Institution's liquid assets.

##### d) NSFR

Ratio of available stable funding over required stable funding.

##### e) Deposit concentration

Coefficient between the top 10 depositors and total customer deposits. This measures the liquidity risk derived from concentrating liability balances.

##### f) Funding costs

It is measured as the weekly change in the secondary market spread of the Institution's issues compared to the rest of the sector. If it is trading with a large spread compared to the sector as a whole, the Bank could face problems in obtaining funding from the wholesale markets or may have to pay a higher rate of interest to do so.

Bankinter Group has several tools for analysing and monitoring the short- and long-term liquidity situation. These include both static and dynamic tools. In addition, backtesting is also conducted on the projections made.

In addition to the above, the Market Risks area controls liquidity risk by verifying compliance with the limits set by the board of directors and delegated to the persons responsible for their management and the ALCO.

An Internal Liquidity Adequacy Assessment Process (ILAAP) is conducted annually to review liquidity measurement and management strategies and procedures. The document provides an overview of the Group's liquidity and funding situation and uses metrics and parameters to describe the management of this risk. In this way, management and the board of directors assess Bankinter's liquidity risk.

The latest ILAAP study (for 2025) found that liquidity risk management is adequate, that Bankinter's liquidity risk profile is low and that all levels of the Bank adhere to strict monitoring and control of this risk. The Liquidity Adequacy Statement analyses:

- Strategy and management of liquidity risk
- The performance of the main liquidity indicators
- Compliance with regulatory and internal limits
- The existence of a robust liquidity contingency plan that includes the areas and committees responsible for overseeing the contingency plan, early warning mechanisms to detect significant changes in the bank's liquidity, and a wide range of liquidity-generating measures, the quantification of which is regularly reviewed.
- Approving the use of assumptions to highlight the Bank's liquidity position, which are presented monthly in ALCO and reflect a very strong liquidity position.

## 9.2. Liquidity and funding prospects

In 2025, the increase in retail funds covered the liquidity needs arising from the growth in lending. Both indicators registered increases exceeding 4,000 million euros, with the deposit-to-loan ratio standing at 105.5%.

In wholesale funding, bonds with a value of 1,000 million euros matured. To cover this maturity and improve its capital position, Bankinter tapped the institutional market on four occasions, issuing 500 million euros in senior preferred debt, 750 million euros in senior non preferred debt, 300 million euros in subordinated debt and 500 million euros of AT1. All of these issuances were very well received by wholesale investors.

Wholesale funding maturities are distributed over time so as to minimise refinancing difficulties.

The liquidity buffer continued to increase, allowing the LCR to remain well above both internal and regulatory limits, reaching 181.16% at the end of the year.

The net stable funding ratio (NSFR), given the balanced and stable composition of the financing provided by Bankinter Group to cover its needs, stands at 152.94% as of 31 December 2025, compared to 142.72% at the end of the previous year.

In 2026, Bankinter expects to continue its balanced growth in lending and in deposits, limiting its dependence on wholesale markets.

Issues in wholesale markets will be used to meet the maturities of wholesale funding and capital requirements.

## 9.3. Liquidity coverage ratio (LCR)

Table LIQ1 below presents the components of the LCR ratio in monthly average data at the end of each quarter of 2025. The values and figures have been calculated as simple averages of month-end observations during the twelve months preceding the end of each quarter, according to the instructions in Regulation (EU) 2024/3172.

## Liquidity coverage ratio, LCR (LIQ1)

		a	b	c	d	e	f	g	h
<b>Consolidated scope</b>		<b>Total unweighted value (average)</b>				<b>Total weighted value (average)</b>			
EU 1a	Quarter ending	31/12/2025	30/9/2025	30/6/2025	31/3/2025	31/12/2025	30/9/2025	30/6/2025	31/3/2025
EU 1b	Number of figures used in calculating the average	12	12	12	12	12	12	12	12
<b>HIGH QUALITY LIQUID ASSETS</b>									
1	Total high-quality liquid assets (HQLA)					24,957	23,121	21,058	18,767
<b>CASH OUTFLOWS</b>									
2	Retail deposits and deposits from small business customers, of which:	53,630	52,492	51,303	50,171	3,814	3,504	3,200	2,898
3	Stable deposits	33,567	31,502	29,117	27,274	1,678	1,575	1,456	1,364
4	Less stable deposits	19,827	17,972	16,344	14,488	2,136	1,929	1,744	1,534
5	Unsecured wholesale funding	27,670	26,920	26,317	26,125	10,609	10,185	9,802	9,923
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	14,467	15,418	15,469	14,895	3,426	3,659	3,676	3,536
7	Non-operational deposits (all counterparties)	12,937	11,266	10,624	11,006	6,917	6,290	5,901	6,162
8	Unsecured debt	266	236	225	224	266	236	225	224
9	Secured wholesale funding					1,379	1,095	1,016	820
10	Additional requirements	14,398	14,205	13,915	13,483	1,381	1,370	1,348	1,331
11	Outflows related to derivative exposures and other collateral requirements	228	242	254	262	228	242	254	262
12	Outflows related to loss of funding on debt products	89	88	88	85	89	88	88	85
13	Credit and liquidity facilities	14,081	13,874	13,573	13,136	1,064	1,039	1,006	984
14	Other contractual funding obligations	247	240	248	240	162	157	167	161
15	Other contingent funding obligations	5,878	5,849	5,827	5,979	806	820	823	832
16	<b>TOTAL CASH OUTFLOWS</b>					18,152	17,130	16,355	15,964
<b>CASH INFLOWS</b>									
17	Secured lending (e.g. reverse repos)	7,707	6,804	6,884	6,989	–	–	–	–
18	Inflows from fully performing exposures	6,431	6,431	6,335	6,465	5,046	5,027	4,881	4,962
19	Other cash inflows	392	545	589	600	392	545	589	600
EU 19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)					–	–	–	–
EU 19b	(Excess inflows from a related specialised credit institution)					–	–	–	–
20	<b>TOTAL CASH INFLOWS</b>	14,530	13,781	13,808	14,054	5,439	5,573	5,471	5,563
EU 20a	Fully exempt inflows	–	–	–	–	–	–	–	–
EU 20b	Inflows subject to 90% cap	–	–	–	–	–	–	–	–
EU 20c	Inflows subject to 75% cap	14,218	13,456	13,434	13,702	5,439	5,573	5,471	5,563
EU 21	<b>LIQUIDITY BUFFER</b>					24,957	23,121	21,058	18,767
22	<b>TOTAL NET CASH OUTFLOWS</b>					12,713	11,558	10,884	10,401
23	<b>LIQUIDITY COVERAGE RATIO (%) (1)</b>					197.36 %	199.40 %	193.00 %	180.02 %

Figures in millions of euros

(\*) Average of the consolidated LCR ratios

## **Qualitative information on the liquidity coverage ratio (LIQB)**

### **Main drivers of LCR performance and change over time of the contribution to the liquidity coverage ratio calculation.**

The metrics that influence the LCR are liquid assets (HQLA) and net liquidity outflows after 30 days, in accordance with the regulations for this ratio.

### **Change in liquidity coverage ratio over time**

At year-end 2025, as throughout the year, the liquidity coverage ratio remained comfortably above regulatory limits and the Group's internal control limits, standing at 197.36% on average over the past 12 months.

### **Concentration of liquidity sources and funding**

Of particular importance within the various sources of funding is that originating from retail deposits, which is characterised by its stability. Wholesale funding is in second place.

### **Composition of the liquidity buffer of the bank**

The liquidity buffer consists largely of Level 1 assets, mainly reserves at central banks that can be withdrawn. Second, there are the assets of public administrations. Third, we have covered bonds with a very high degree of liquidity. In addition to regulatory liquid assets, Bankinter has a significant amount of unencumbered liquid funds available for immediate use as collateral to obtain additional financing.

### **Derivative exposures and possible collateral calls**

Derivative transactions are carried out under credit support annexes (CSAs) that Bankinter has entered into with the various counterparties it operates with, illustrating that hedging derivatives exposure is normal practice for the Bank.

### **Currency mismatches in the LCR**

Bankinter only produces a liquidity coverage ratio (LCR) in euros at the consolidated level, as this is its only significant currency.

### **Other elements involved in calculating the liquidity ratio**

There are no other relevant LCR calculation elements that are not included in the LCR disclosure template.

## 9.4. Net stable funding ratio (NSFR)

Details of the NSFR ratio by maturity tranche are shown below:

### Net stable funding ratio, NSFR (LIQ2)

	Value not weighted by residual maturity		Weighted value			
	No maturity	< 6 months	6 months to < 1 year	One year or more		
<b>Available stable funding items (ASF)</b>						
1	<b>Capital items and instruments</b>	<b>6,580</b>	–	–	<b>1,282</b>	<b>7,862</b>
2	Shareholder's equity	6,580	–	–	1,282	7,862
3	Other capital instruments	–	–	–	–	–
4	<b>Retail deposits</b>	–	<b>55,701</b>	<b>142</b>	<b>15</b>	<b>51,967</b>
5	Stable deposits	–	33,879	–	–	32,185
6	Less stable deposits	–	21,822	142	15	19,782
7	<b>Wholesale financing:</b>	–	<b>53,129</b>	<b>2,129</b>	<b>5,760</b>	<b>24,441</b>
8	Operating deposits	–	12,512	–	–	6,256
9	Other wholesale funding	–	40,618	2,129	5,760	18,186
10	<b>Interdependent liabilities</b>	–	–	–	–	–
11	<b>Other liabilities:</b>	<b>49</b>	<b>3,562</b>	<b>4</b>	<b>1,249</b>	<b>1,251</b>
12	Liabilities arising from the net stable funding ratio	49	–	–	–	–
13	All other liabilities and capital instruments not included in the previous categories	–	3,562	4	1,249	1,251
14	<b>Total stable funding available</b>	–	–	–	–	<b>85,521</b>
<b>Required stable funding (RSF) items</b>						
15	<b>Total high-quality liquid assets (HQLA)</b>	–	–	–	–	<b>562</b>
EU 15a	<b>Encumbered assets with a residual maturity of one year or more in a coverage pool</b>	–	–	–	<b>1,862</b>	<b>1,583</b>
16	Deposits held in other financial entities for operating purposes	–	–	–	–	–
17	<b>Performing loans and securities:</b>	–	<b>31,617</b>	<b>7,842</b>	<b>55,006</b>	<b>50,151</b>
18	Non-Performing securities financing transactions with financial customers collateralised by Tier 1 HQLA are subject to a valuation haircut of 0%	–	7,888	–	–	–
19	Non-Performing securities financing transactions with financial customers collateralised by other assets and loans and advances to financial institutions	–	6,151	1,776	983	2,408
20	Performing loans to non-financial corporate customers, loans to retail and small business customers, and loans to sovereign issuers and public sector entities, of which:	–	11,611	5,377	17,010	44,679
21	With a risk weight of 35% or less under the Basel II standardised approach for credit risk	–	1,082	705	8,850	27,339
22	Mortgages on residential real estate, of which:	–	142	134	34,922	–
23	With a risk weight of 35% or less under the Basel II standardised approach for credit risk	–	135	131	31,630	–
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equity and on-balance sheet trade finance products	–	5,825	556	2,092	3,064
25	<b>Interdependent assets</b>	–	–	–	–	–
26	<b>Other assets</b>	–	<b>2,381</b>	<b>384</b>	<b>2,461</b>	<b>2,890</b>
27	Physically traded commodities	–	–	–	–	–
28	Assets posted as initial margin for derivatives contracts and contributions to CCP default funds	–	46	–	–	39
29	Assets arising from the net stable funding ratio	–	–	–	–	–
30	Liabilities resulting from the net stable funding ratio before deduction of the contributed variation margin	–	818	–	–	41
31	All other assets not included in the above categories	–	1,517	384	2,461	2,810
32	<b>Off-balance sheet items</b>	–	<b>287</b>	<b>89</b>	<b>14,021</b>	<b>733</b>
33	<b>Total stable funding required</b>	–	–	–	–	<b>55,919</b>
34	<b>Net stable funding ratio (%)</b>	–	–	–	–	<b>152.94 %</b>

Figures in millions of euros

## Net stable funding ratio, NSFR (LIQ2) (30.09.2025)

	Value not weighted by residual maturity		Weighted value			
	No maturity	< 6 months	6 months to < 1 year	One year or more		
<b>Available stable funding items (ASF)</b>						
1	Capital items and instruments	6,382	–	–	1,291	7,673
2	Shareholder's equity	6,382	–	–	1,291	7,673
3	Other capital instruments		–	–	–	–
4	<b>Retail deposits</b>		54,600	158	26	51,081
5	Stable deposits		35,447	–	–	33,675
6	Less stable deposits		19,153	158	26	17,406
7	<b>Wholesale financing:</b>		50,794	3,555	5,381	25,179
8	Operating deposits		13,998	–	–	6,999
9	Other wholesale funding		36,797	3,555	5,381	18,180
10	<b>Interdependent liabilities</b>		–	–	–	–
11	<b>Other liabilities:</b>	46	3,677	6	1,471	1,474
12	Liabilities arising from the net stable funding ratio	46				
13	All other liabilities and capital instruments not included in the previous categories		3,677	6	1,471	1,474
14	<b>Total stable funding available</b>					<b>85,406</b>
<b>Required stable funding (RSF) items</b>						
15	<b>Total high-quality liquid assets (HQLA)</b>					<b>588</b>
EU 15a	<b>Encumbered assets with a residual maturity of one year or more in a coverage pool</b>		–	–	1,864	1,585
16	Deposits held in other financial entities for operating purposes		–	–	–	–
17	<b>Performing loans and securities:</b>		28,811	7,859	55,692	50,555
18	Non-Performing securities financing transactions with financial customers collateralised by Tier 1 HQLA are subject to a valuation haircut of 0%		8,235	–	–	–
19	Non-Performing securities financing transactions with financial customers collateralised by other assets and loans and advances to financial institutions		4,553	1,787	1,205	2,496
20	Performing loans to non-financial corporate customers, loans to retail and small business customers, and loans to sovereign issuers and public sector entities, of which:		11,240	5,442	17,055	44,802
21	With a risk weight of 35% or less under the Basel II standardised approach for credit risk		776	1,084	6,741	25,934
22	Mortgages on residential real estate, of which:		142	128	34,685	–
23	With a risk weight of 35% or less under the Basel II standardised approach for credit risk		135	127	31,525	–
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equity and on-balance sheet trade finance products		4,642	502	2,746	3,257
25	<b>Interdependent assets</b>		–	–	–	–
26	<b>Other assets</b>		2,843	5	2,415	2,889
27	Physically traded commodities				–	–
28	Assets posted as initial margin for derivatives contracts and contributions to CCP default funds		70	–	–	59
29	Assets arising from the net stable funding ratio		–			–
30	Liabilities resulting from the net stable funding ratio before deduction of the contributed variation margin		1,055			53
31	All other assets not included in the above categories		1,718	5	2,415	2,777
32	<b>Off-balance sheet items</b>		268	124	14,310	751
33	<b>Total stable funding required</b>					<b>56,368</b>
34	<b>Net stable funding ratio (%)</b>					<b>151.51%</b>

Figures in millions of euros

## Net stable funding ratio, NSFR (LIQ2) (30.06.2025)

	Value not weighted by residual maturity		Weighted value			
	No maturity	< 6 months	6 months to < 1 year	One year or more		
<b>Available stable funding items (ASF)</b>						
1	Capital items and instruments	6,327	–	–	1,289	7,615
2	Shareholder's equity	6,327	–	–	1,289	7,615
3	Other capital instruments		–	–	–	–
4	<b>Retail deposits</b>		53,898	148	–	50,286
5	Stable deposits		32,889	–	–	31,245
6	Less stable deposits		21,009	148	–	19,041
7	<b>Wholesale financing:</b>		52,867	3,567	6,151	25,843
8	Operating deposits		15,410	–	–	7,705
9	Other wholesale funding		37,458	3,567	6,151	18,138
10	<b>Interdependent liabilities</b>		–	–	–	–
11	<b>Other liabilities:</b>	72	4,519	8	1,214	1,217
12	Liabilities arising from the net stable funding ratio	72				
13	All other liabilities and capital instruments not included in the previous categories		4,519	8	1,214	1,217
14	<b>Total stable funding available</b>					84,961
<b>Required stable funding (RSF) items</b>						
15	<b>Total high-quality liquid assets (HQLA)</b>					587
EU 15a	<b>Encumbered assets with a residual maturity of one year or more in a coverage pool</b>		–	–	1,866	1,586
16	Deposits held in other financial entities for operating purposes		–	–	–	–
17	<b>Performing loans and securities:</b>		30,950	9,298	55,251	51,309
18	Non-Performing securities financing transactions with financial customers collateralised by Tier 1 HQLA are subject to a valuation haircut of 0%		10,006	–	–	–
19	Non-Performing securities financing transactions with financial customers collateralised by other assets and loans and advances to financial institutions		3,801	2,750	1,233	2,970
20	Performing loans to non-financial corporate customers, loans to retail and small business customers, and loans to sovereign issuers and public sector entities, of which:		11,131	5,860	17,607	45,162
21	With a risk weight of 35% or less under the Basel II standardised approach for credit risk		787	1,023	6,591	25,765
22	Mortgages on residential real estate, of which:		272	248	34,130	–
23	With a risk weight of 35% or less under the Basel II standardised approach for credit risk		266	246	31,262	–
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equity and on-balance sheet trade finance products		5,739	439	2,281	3,177
25	<b>Interdependent assets</b>		–	–	–	–
26	<b>Other assets</b>		4,027	5	2,225	3,086
27	Physically traded commodities				–	–
28	Assets posted as initial margin for derivatives contracts and contributions to CCP default funds		71	–	–	61
29	Assets arising from the net stable funding ratio		–			–
30	Liabilities resulting from the net stable funding ratio before deduction of the contributed variation margin		1,307			65
31	All other assets not included in the above categories		2,648	5	2,225	2,960
32	<b>Off-balance sheet items</b>		283	81	14,735	768
33	<b>Total stable funding required</b>					57,338
34	<b>Net stable funding ratio (%)</b>					148.18%

Figures in millions of euros

## Net stable funding ratio, NSFR (LIQ2) (31.03.2025)

	Value not weighted by residual maturity		Weighted value			
	No maturity	< 6 months	6 months to < 1 year	One year or more		
<b>Available stable funding items (ASF)</b>						
1	Capital items and instruments	6,023	–	–	982	7,005
2	Shareholder's equity	6,023	–	–	982	7,005
3	Other capital instruments		–	–	–	–
4	<b>Retail deposits</b>		52,397	32	–	48,796
5	Stable deposits		32,199	–	–	30,589
6	Less stable deposits		20,197	32	–	18,207
7	<b>Wholesale financing:</b>		49,316	2,872	5,617	23,721
8	Operating deposits		14,950	–	–	7,475
9	Other wholesale funding		34,366	2,872	5,617	16,246
10	<b>Interdependent liabilities</b>		–	–	–	–
11	<b>Other liabilities:</b>	38	4,367	30	1,172	1,187
12	Liabilities arising from the net stable funding ratio	38				
13	All other liabilities and capital instruments not included in the previous categories		4,367	30	1,172	1,187
14	<b>Total stable funding available</b>					80,710
<b>Required stable funding (RSF) items</b>						
15	<b>Total high-quality liquid assets (HQLA)</b>					549
EU 15a	<b>Encumbered assets with a residual maturity of one year or more in a coverage pool</b>		–	–	1,884	1,602
16	Deposits held in other financial entities for operating purposes		–	–	–	–
17	<b>Performing loans and securities:</b>		28,421	8,029	54,539	49,631
18	Non-Performing securities financing transactions with financial customers collateralised by Tier 1 HQLA are subject to a valuation haircut of 0%		8,723	–	–	–
19	Non-Performing securities financing transactions with financial customers collateralised by other assets and loans and advances to financial institutions		3,415	2,216	1,241	2,681
20	Performing loans to non-financial corporate customers, loans to retail and small business customers, and loans to sovereign issuers and public sector entities, of which:		10,929	5,051	17,299	43,668
21	With a risk weight of 35% or less under the Basel II standardised approach for credit risk		1,110	869	8,247	26,552
22	Mortgages on residential real estate, of which:		363	247	33,461	–
23	With a risk weight of 35% or less under the Basel II standardised approach for credit risk		358	242	30,618	–
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equity and on-balance sheet trade finance products		4,991	514	2,538	3,282
25	<b>Interdependent assets</b>		–	–	–	–
26	<b>Other assets</b>		3,167	–	2,390	3,020
27	Physically traded commodities				–	–
28	Assets posted as initial margin for derivatives contracts and contributions to CCP default funds		199	–	–	169
29	Assets arising from the net stable funding ratio		–			–
30	Liabilities resulting from the net stable funding ratio before deduction of the contributed variation margin		998			50
31	All other assets not included in the above categories		1,969	–	2,390	2,801
32	<b>Off-balance sheet items</b>		295	103	13,430	707
33	<b>Total stable funding required</b>					55,509
34	<b>Net stable funding ratio (%)</b>					145.40%

Figures in millions of euros

10.

Leverage



## 10. Leverage

### 10.1. Definition and composition of the leverage ratio

The leverage ratio complements the other capital indicators, seeking to encourage institutions to maintain prudent financing structures, restricting excessive leverage and avoiding destabilisation of the economy and the banking system.

As defined in Regulation (EU) No 575/2013 (CRR), as modified by Commission Delegated Regulation (EU) 2024/1623 (CRR3), this is the ratio of tier 1 capital to total exposure. The elements used to build the ratio are as follows:

- **Tier 1 capital:** this consists of common equity tier 1 and additional tier 1 capital, jointly tier 1 capital, as defined in section 2.1 of this report.
- **Exposure:** as defined in article 429 of the Regulation, this is the sum of balance sheet assets, off-balance sheet items, derivative and securities financing exposures, and Tier I deductions.
  - a) Balance sheet assets: includes the carrying amount of financial assets, but does not include derivatives or securities financing transactions (which are considered in the following sections).
  - b) Exposures in derivatives: includes the replacement cost following application of netting agreements and collateral received and the potential future risk (add-on) taking into account contractual netting agreements.
  - c) Exposure in securities financing transactions: includes the value of the exposure plus an add-on for counterparty credit risk.
  - d) Off-balance sheet items: this relates to contingent risks and commitments, applying a floor of 10% to the conversion factors, in line with article 429 septies of the Regulation.
  - e) Conventional purchases or sales outstanding, calculated as referred to in Article 429g of the Regulation.

Exposures excluded from the total exposure measure:

- Tier 1 deductions: amounts deducted from the tier 1 capital measure to ensure consistency between the measurement of capital and exposure, reducing the leverage ratio exposure. These deductions are shown in Point 2 of this report.
- The other exposures that are described in article 429 bis of the CRR2.

At the close of 2025, Bankinter Group's leverage ratio stood at 5.26%, compared to 5.03% in the previous year. The 2025 and 2024 ratios are both well above the minimum regulatory requirement of 3%.

### Bankinter Group leverage ratio at the end of December 2024 and 2025:

	2025	2024
Tier 1	6,580,172	5,927,633
Exposure	125,191,297	117,919,464
<b>Leverage ratio</b>	<b>5.26 %</b>	<b>5.03 %</b>

Figures in thousands of euros

Below is a reconciliation between the Group's financial statements and the exposure considered in the calculation of the 2025 leverage ratio:

**Summary of the reconciliation of accounting assets and exposures corresponding to the leverage ratio (LR1).**

		a
		Q4 25
1	Total assets according to published financial statements	131,018,892
2	Adjustment for entities consolidated for accounting purposes, but that fall outside the regulatory consolidation scope	44,233
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transfer)	-160,910
4	(Adjustment for temporary exemption of exposures to central banks (if applicable))	-
5	(Adjustment for fiduciary assets recognised on the balance sheet under the applicable accounting framework but excluded from the total exposure measure under CRR Article 429a(1)(i))	-
6	Adjustment for regular way purchases and sales of financial assets subject to accounting on the trade date	-
7	Adjustment for eligible cash pooling transactions	-
8	Adjustment for derivative financial instruments	-1,576,855
9	Adjustment for securities financing transactions	-7,328,636
10	Adjustment for off-balance-sheet items (i.e. conversions of off-balance-sheet exposures to credit equivalents)	6,782,225
11	(Prudent valuation adjustments and specific and general provisions that have reduced Tier 1 capital)	-
EU 11a	(Adjustment for exposures excluded from the total exposure measure in accordance with Article 429a(1)(c) CRR)	-
EU 11b	(Adjustment for exposures excluded from the total exposure measure in accordance with Article 429a(1)(j) of the CRR)	-
12	Other adjustments	-3,587,652
13	<b>Total leverage ratio exposure measure</b>	<b>125,191,297</b>

Figures in thousands of euros

The following table breaks down the elements that were considered in the calculation of the leverage ratio at 31 December 2025:

### Leverage ratio common disclosure table (LR2)

		CRR leverage ratio exposures	
		a	b
<b>On balance sheet exposures (excluding derivatives and SFTs)</b>		<b>Q4 25</b>	<b>Q2 25</b>
1	On balance sheet items (excluding derivatives, SFTs and fiduciary assets, but including security interests)	116,431,487	114,532,996
2	Gross-up for derivative collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	–	–
3	Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-407,895	-221,360
4	(Adjustment for securities received in securities financing transactions recognised as assets)	–	–
5	(Adjustments for general credit risk of on-balance sheet items)	–	–
6	(Amounts of assets deducted to determine tier 1 capital)	-495,602	-532,993
7	Total on balance sheet exposures (excluding derivatives, SFTs and fiduciary assets)	<b>115,527,991</b>	<b>113,778,642</b>
<b>Exposures in derivatives</b>			
8	Replacement cost associated with all derivative transactions under the standardised approach to counterparty risk (i.e. net of eligible cash variation margin)	–	–
EU-8a	Exception applicable to derivatives: contribution to replacement costs under the simplified standardised approach	–	–
9	Amounts of additions for potential future exposure associated with derivative transactions under the standardised approach for counterparty credit risk	230,031	264,903
EU-9a	Exception for derivatives: potential contribution to future exposure under the simplified standardised approach	–	–
EU-9b	Exposure determined under original exposure approach	–	–
10	(CCP component excluding client-cleared trading exposures) (standardised approach for counterparty credit risk)		
EU-10a	(CCP-exempt portion of trade exposures netted by the client) (simplified standardised approach)		
EU-10b	(CCP-exempt portion of trade exposures netted by the client) (original exposure method)		
11	Adjusted effective notional amount of written credit derivatives		
12	(Adjusted effective notional offsets and additional deductions for credit derivatives entered into)		
13	Total derivatives exposures	<b>230,031</b>	<b>264,903</b>
<b>SFT exposures</b>			
14	Gross assets of securities financing transactions (without recognition of netting), after adjustments for sale accounting transactions	9,979,687	11,899,949
15	(Net amounts of cash payable and cash receivable in gross assets of securities financing transactions)	-7,328,636	-8,445,700
16	Counterparty credit risk exposure on securities financing transaction assets	–	–
EU-16a	Exemption for securities financing transactions: Counterparty risk exposure under Article 429e(5) and Article 222 of the CRR	–	–
17	Agent transaction exposures	–	–
EU-17a	(CCP component excluding exposures from securities financing transactions netted by the client)	–	–
18	Total SFT exposures	<b>2,651,051</b>	<b>3,454,249</b>
<b>Off balance-sheet exposures</b>			
19	Off-balance sheet exposures at gross notional amount	29,094,695	27,722,884

20	(Adjustments for conversion to credit equivalent amounts)	-22,312,470	-21,223,276
21	(General provisions deducted for the determination of Tier 1 capital and specific provisions associated with off-balance sheet exposures)	–	–
22	Off balance sheet exposures	<b>6,782,225</b>	<b>6,499,609</b>
<b>Exposures exempted</b>			
EU-22a	(Exposures excluded from the total leverage ratio exposure measure in accordance with Article 429a(1) of the CRR)	–	–
EU-22b	(Exposures exempted under Article 429a(1)(j) CRR (on- and off-balance sheet))	–	–
EU-22c	(-) Exposures excluding public development banks - Public sector investments	–	–
EU-22d	(Excluded promotional loans from public development banks: - Promotional loans granted by a public development credit institution - Promotional loans granted by an entity set up directly by the central government, regional governments or local authorities of a Member State - Promotional loans granted by an institution set up by the central government, regional governments or local authorities of a Member State through an intermediate credit institution)	–	–
EU-22e	(Excluding exposures of promotional loans transferred by non-public development banks or units): - Promotional loans granted by a public development credit institution - Promotional loans granted by an entity set up directly by the central government, regional governments or local authorities of a Member State - Promotional loans granted by an institution set up by the central government, regional governments or local authorities of a Member State through an intermediate credit institution)	–	–
EU-22f	(Excluding the secured portions of export credit risks)	–	–
EU-22g	(Excluding excess collateral lodged with tripartite agents)	–	–
EU-22h	(Excluding CSD-related services of institutions in accordance with point (o) of Article 429a(1) of CRR)	–	–
EU-22i	(CSD-related services excluded from entities designated in accordance with Article 429a(1) of the CRR)	–	–
EU-22j	(Reduction in the exposure value of pre-financing or mezzanine loans)	–	–
EU-22k	(Total exposures excluded)	–	–
<b>Capital and total exposure measurement</b>			
23	Tier 1 capital	<b>6,580,172</b>	<b>6,326,561</b>
24	Measurement of total exposure for leverage ratio	<b>125,191,298</b>	<b>123,997,403</b>
<b>Leverage ratio</b>			
25	Leverage ratio (%)	5.26 %	5.10 %
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	5.26 %	5.10 %
25a	Leverage ratio (excluding the impact of any applicable temporary exemption from central bank reserves) (%)	5.26 %	5.10 %
26	Regulatory minimum leverage ratio requirement (%)	3.00 %	3.00 %
EU-26a	Additional shareholders' equity requirements to address the excessive leverage ratio (%)	0.00 %	0.00 %
EU-26b	of which: consisting of common equity tier 1	0.00 %	0.00 %
27	Required leverage ratio buffer requirement (%)	0.00 %	0.00 %
EU-27a	Overall leverage ratio requirement (%)	3.00 %	3.00 %
<b>Choice on transitional arrangements and relevant exposures</b>			
EU-27b	Choice of transitional arrangements for the definition of the capital measure		
<b>Disclosure of mean values</b>			
28	Average value of SFT gross assets, after adjusting for sales accounting transactions and deducting the amounts of cash liabilities and related cash receivables.	2,931,789	3,161,210
29	Quarter-end value of SFT gross assets, after adjusting for sales accounting transactions and net of related cash liabilities and receivables	2,651,051	3,454,249

30	Measurement of total exposure (including the effect of any temporary relief from central bank reserves) incorporating the averages of line 28 of gross assets of securities financing transactions (after adjustment for accounting sales transactions and net of amounts of related payment and cash receipt assets).	125,472,035	123,704,364
30a	Measure of total exposure (excluding the effect of any applicable temporary central bank reserve exemption) comprising the averages of line 28 of gross SFT assets (after adjustment for accounting sales transactions and net of related cash liabilities and assets).	125,472,035	123,704,364
31	Leverage ratio ((including the effect of any applicable temporary central bank reserve exemption) comprising the averages of line 28 of gross SFT assets (after adjustment for accounting sales transactions and net of related cash payables and receivables).	5.24 %	5.11 %
31a	Leverage ratio (excluding the effect of any applicable temporary central bank reserve exemption) comprising the averages of line 28 of gross SFT assets (after adjustment for accounting sales transactions and net of related cash payables and receivables).	5.24 %	5.11 %

Figures in thousands of euros

Below is a breakdown of on-balance sheet exposures (excluding derivatives, SFTs and exempted exposures):

### On-balance sheet exposures (excluding derivatives, SFTs and exempted exposures (LR3))

		a
		CRR leverage ratio exposures
EU-1	<b>Total on-balance sheet exposures (excluding derivatives, securities financing transactions and excluded exposures), of which:</b>	<b>116,023,593</b>
EU-2	Trading book exposures	2,099,554
EU-3	Loan book exposures, of which:	113,924,039
EU-4	Covered bonds	—
EU-5	Exposures treated as sovereigns	31,597,781
EU-6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	1,415,288
EU-7	Institutions	5,648,294
EU-8	Secured by mortgages of immovable properties	36,093,744
EU-9	Retail exposures	10,109,514
EU-10	Corporates	25,114,689
EU-11	Defaulted exposures	745,851
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	3,198,876

Figures in thousands of euros

## 10.2. Trends in the leverage ratio

The leverage ratio increased by 23 basis points during 2025, from 5.03% at the end of 2024 to 5.26% at 31 December 2025.

The value of the numerator of the ratio, tier 1 capital, increased in the year by 653 million euros, mainly due to retained earnings and the issuance of AT1, which more than offset the increase in total exposure, which is the denominator of the ratio.

The total exposure of the ratio, in the denominator, increased in the year by 7,272 million euros, mainly due to the increase in the total assets of the Group's balance sheet due to the increase in lending that resulted from the commercial drive during the year.

## 10.3. Managing the risk of excessive leverage

Bankinter Group calculates the leverage ratio quarterly, analysing the changes in all the items that comprise both its numerator and denominator, and carrying out close monitoring to ensure that the ratio remains comfortably above the minimum required level and that there is no risk of excessive leverage at any time. This analysis is reported quarterly to senior management.

In addition to this quarterly monitoring, Bankinter's leverage ratio is also one of the tier 1 ratios monitored by the board of directors in the risk appetite framework. The Institution has established operational measures and limits by actively integrating the leverage ratio into risk management and ensuring that it remains at levels that are in line with sustainable balance sheet growth and with a prudent risk policy.

Forecasts for this ratio are also made in the three-year projections for the balance sheet, earnings and capital, for both the central and stressed scenarios, to guarantee compliance in adverse situations.

The ratio has been monitored as part of the Group's regulatory reporting since 2014, in compliance with the disclosure requirements in the regulations, confirming that the ratio comfortably exceeds the minimum required levels.

As an additional transparency measure, the LR1, LR2 and LR3 tables are published every six months on Bankinter Group's corporate website.

11

## Information on asset encumbrance



## 11. Information on asset encumbrance

Asset encumbrance refers to the part of the Institution's assets that have been committed as a result of use in guaranteed funding operations.

Bankinter Group reports the information required under Commission Delegated Regulation (EU) No 2024/3172 below.

The scope of regulatory consolidation used in this report is the same as that defined for the application of liquidity requirements on a consolidated basis, as set out in Part Two, Chapter 2 of Regulation (EU) No 575/2013 (CRR), as modified by Regulation (EU) No 2024/1623 (CRR3). Therefore, there is no difference between them.

Neither are there any difference between the assets pledged and transferred in accordance with the applicable accounting frameworks used by the Bank, and the encumbered assets. There is no difference between the treatment of these transactions.

The amount of the exposure shown in the following tables, corresponds to the carrying amount and the fair value. The information relating to the amount of the published values is calculated as the average of the quarterly values, as this measure of centralisation reflects the inequality of the frequency distribution of the values, dividing the distribution of them into two equal parts (second quartile).

The main sources of asset encumbrance in Bankinter can be classified according to the type of asset associated with a specific obligation, as set out below.

### Loans and advances to customers

#### Securitisation

Since 2004, transactions transferred to securitisation funds appear on the consolidated balance sheet. However, credit rights are assigned to funds that in turn issue debt acquired by investors. This includes the limitation involved in transferring the credit risk on the securitised transactions to securitisation funds, up to the amount of the securitisation bonds held by third parties or used to secure financing transactions. It is also worth pointing out that there is no significant guarantee envelope.

#### Covered bonds

In accordance with the Spanish Mortgage Market Law, covered bonds can be issued on mortgages with a LTV of less than 80% and on commercial mortgages with a LTV under 60%. The legal over-collateralisation of issued covered bonds is set at 5%. As a result, in covered bonds sold to investors, 105% of the issued amount is recognised as loans associated with these bonds. With regard to on-balance sheet covered bonds, loans have been included for 105% of the amount required to obtain Eurosystem funds.

### Transferable securities

#### Repurchase agreements

A significant part of fixed income securities are transferred as a guarantee so they can be funded in the repo market. All securities placed as collateral are considered unavailable for the purpose of asset encumbrance disclosure. All of the Bank's accounting portfolios are included: the 'Financial assets held for trading', 'Financial assets not held for trading mandatorily at fair value through profit or loss', 'Financial assets at fair value through other comprehensive income' and 'Financial assets at amortised cost' portfolios.

Collateral agreements signed to trade through CCPs and with other counterparties are also included. The mark-to-market valuation of derivatives and repo transactions are the main generators of collateral taken or given.

#### Impact of the business model on the level of encumbrance. Importance of encumbrance in the financing model

Among Group entities, encumbrance always come from the parent company, with no identified intragroup encumbrance at the end of December 2025.

In addition to this, there are no material encumbrances either off-balance sheet or in currencies other than the reference currencies.

Other forms of encumbrance are also carried out. These are shown in the summary table below, 'Encumbered and unencumbered assets (AE1)', with figures for the December 2025 close:

## Encumbered and unencumbered assets (AE1)

	Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
	10	30 of which notionally eligible EHQLA and HQLA	40	50 of which notionally eligible EHQLA and HQLA	60	80 of which EHQLA and HQLA	90	100 of which EHQLA and HQLA
<b>10 Assets of the reporting institution</b>	<b>28,892,561</b>	<b>9,153,913</b>			<b>100,471,955</b>	<b>17,860,682</b>		
30 Equity instruments	10,809	3,855			866,691	37,617		
40 Debt securities	9,152,371	9,150,708	8,985,289	8,985,289	8,975,000	6,941,491	8,960,872	6,852,920
50 of which: covered bonds	–	–	–	–	19,252	23,067	19,676	19,676
60 of which: securitisations	–	–	–	–	–	–	–	–
70 of which: issued by public administrations	9,150,708	9,150,708	8,985,289	8,985,289	6,698,207	6,761,131	6,714,069	6,675,399
80 of which: issued by financial corporations	3,327	–	3,299	–	1,288,607	29,259	1,271,069	26,021
90 of which: issued by non-financial corporations	–	–	–	–	928,398	151,101	924,478	148,667
120 Other assets	19,497,189	–			89,618,129	10,881,574		

Figures in thousands of euros

The columns of "Unencumbered assets" reflect the assets that are available for sale or to be used as collateral when in need of liquidity. Most of this balance comprises loan and advances with customers, debt securities and capital instruments, all of which can be used for this purpose. Nevertheless, a small part of the amount reflected in these columns relates to items that cannot be sold or pledged and that correspond to intangible assets, goodwill, tax assets, etc.

The columns of 'Encumbered assets' mostly relate to loans and credits linked to the issue of covered bonds and securitisation bonds.

The amount for 'Other assets' mainly relates to the Bank's loan book.

## Collateral received (AE2)

The following chart reflects collateral received (primarily debt securities) as well as collateral that could be committed.

	Fair value of encumbered collateral received or own debt securities issued		Unencumbered	
			Fair value of collateral received or own debt securities issued available for encumbrance	
		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA
<b>130 Collateral received by the reporting institution</b>	2,838,868	2,838,868	13,464,154	8,984,926
140 Loans on demand	–	–	–	–
150 Equity instruments	–	–	–	–
160 Debt securities	2,838,868	2,838,868	12,678,459	8,984,926
170 Of which: covered bonds	183,342	183,342	2,806,545	2,806,545
180 Of which: securitisations	–	–	4,016,374	511,173
190 Of which: issued by public administrations	2,747,436	2,747,436	5,661,282	5,661,282
200 Of which: issued by financial corporations	183,342	183,342	7,042,064	3,375,658
210 Of which: issued by non-financial corporations	–	–	–	–
220 Loans and advances other than loans on demand	–	–	–	–
230 of which:	–	–	785,980	–
240 Own debt securities issued other than own covered bonds or asset-backed securities	–	–	–	–
241 Own issued and not yet pledged securitisations and covered bonds	–	–	1,979,531	–
<b>250 TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED</b>	<b>31,690,932</b>	<b>11,684,524</b>		

Figures in thousands of euros

Lastly, a breakdown of the amounts of encumbered own debt securities issued (covered bonds and securitisation bonds) and the assets which cover them is shown in table AE3 below.

Therefore, financial liabilities issued and linked to certain assets and guarantees received at 31 December 2025, are as follows:

- The 'Liabilities' column includes matching liabilities, contingent liabilities and securities lent.
- The 'Assets' column includes assets, collateral received and own debt securities issued other than covered bonds and encumbered ABSs.

**Sources of encumbrance (AE3)**

		Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and encumbered ABSs
		10	30
10	Carrying amount of selected financial liabilities	22,492,373	24,702,202

Figures in thousands of euros

12

## Remuneration



## 12. Remuneration

### 12.1. Information on the decision-making process for establishing the remuneration policy

Pursuant to Bankinter's by-laws and the rules and regulations of its board of directors, Bankinter's board of directors is responsible for setting up a control and supervision system for the remuneration policy. It has a remuneration committee which is responsible for monitoring and oversight of implementation of the policy.

The duties of the remuneration committee are regulated in Article 41 of the [rules and regulations of the board of directors](#). The committee also has its own regulations, the current version of which was approved by the board of directors on 18 May 2022 and added to Bankinter Group's internal corporate governance rules. These regulations foster the remuneration committee's independence and determine the guiding principles and basic rules of its composition, operation and powers, in line with best corporate governance practices. The duties of the committee are set out in the [regulations of the remuneration committee](#).

At the date of this report, the remuneration committee is composed of four directors appointed by the board of directors, all external and non-executive, in accordance with the provisions of the Spanish Companies Act, the majority of whom are independent directors (75%), including the chair. Its current composition is available on the corporate website.

Bankinter's remuneration committee met six times to perform its duties in 2025: five times in ordinary session and once on an extraordinary basis. This information, together with details of the specific duties and activities of the committee in 2025, is detailed in the [2025 annual activity report of the remuneration committee](#), which is available on the Group's corporate website. This report also describes the experience and knowledge of the members of the remuneration committee and the results of their annual performance evaluations, among other information.

To attract, retain and ensure the commitment of the best professionals in pursuing the Group's long-term objectives, the remuneration committee and the board were supported in their decisions about remuneration for 2026, as in previous years, by comparative studies conducted by an external consultancy firm, in which the Bank's remuneration was compared with that in comparable markets and institutions. Details are provided in section 2.1.2 of the [Directors' Remuneration Reports](#), which are available on the corporate website.

In addition to the competencies of the remuneration committee, the duties of the risk and compliance committee in relation to the Remuneration Policy include helping to draw up rational remuneration policies and practices, as set out in the [regulations of the risk and compliance committee](#). The risk and compliance committee verified before payment was made and without prejudice to the functions of the remuneration committee that the incentives envisaged for identified staff<sup>4</sup>, which includes the executive directors, take into consideration risk, capital, liquidity and the probability and timing of profits. The risk and compliance committee also received reports from the Risk Control area on the suitability of the parameters and values proposed as variable incentive targets for variable remuneration for the financial years 2025 and 2026 for identified staff. These reports concluded that they comply with Bankinter's risk appetite level and strike an appropriate balance between the various objectives so as not to encourage actions that might generate excessive risks.

The current remuneration policy for Bankinter's directors for the years 2025, 2026 and 2027 was approved by 88.953% of the capital present and represented at the Annual General Meeting held on 21 March 2024 and came into force on that same day (pursuant to Article 529 novodecies of the Consolidated Text of the Spanish Companies Act).

The Directors' Remuneration Reports are submitted to an advisory vote at the Annual General Meeting, in compliance with the provisions of Article 541 of the Consolidated Text of the Spanish Companies Act. In this regard:

- Bankinter's Annual General Meeting held on 27 March 2025 approved, on an advisory basis (with a percentage of 89.792%), the [Annual Directors' Remuneration Report](#), which includes information on the application of the remuneration policy in financial year 2024 and the remuneration system applicable to financial year 2025.
- The board of directors has submitted the [Annual Directors' Remuneration Report](#) for approval (on an advisory basis) to the Annual General Meeting to be held on 26 March 2026. This report includes information on the application of the remuneration policy in financial year 2025 and the remuneration system applicable to financial year 2026.

Bankinter Group's current general remuneration policy, which is described in this report, was approved by the board of directors, at the proposal of the remuneration committee, at its meeting on 19 January 2022. The main purpose of this policy is to establish a remuneration system that is compatible with the business strategy, objectives, values and long-term interests of Bankinter, both in absolute terms and in comparison with the sector. The policy aims to clearly and concisely define the Bank's remuneration practices, so that these practices in no way jeopardise the stability of the company by offering incentives to employees to assume excessive risk.

<sup>4</sup> The categories of personnel whose professional activities have a material impact on the Entity's risk profile.

## 12.2. Principles of Bankinter's remuneration policy

The general principles governing Bankinter's remuneration policy are set out in section 2.2 of the [Directors' Remuneration Report](#), which is available on Bankinter's corporate website.

## 12.3. Description of the types of employees and executives considered identified staff

In order to determine the Company's Identified Staff, the board of directors, at its meeting held on 21 January 2015, convened on the recommendation of the remuneration committee, approved a policy for determining Identified Staff. This was amended by the board of directors on the recommendation of the remuneration committee at its meeting held on 20 October 2021.

This policy sets out the criteria for determining the members of staff or categories of staff whose professional activities have an impact on the risk profile of the Entity, taking into account the criteria set out in Delegated Regulation (EU) 2021/923 of 25 March 2021 supplementing Directive 2013/36/EU of the European Parliament and of the Council (the "implementing regulation").

In general, on the basis of the quantitative and qualitative criteria provided for in the applicable regulations and applied to their internal rules, the following persons are among the identified staff of Bankinter Group on a consolidated basis:

- According to **qualitative criteria**, based on the authority and responsibility delegated to the Entity's staff member, the following are part of the identified staff:
  - Members of the board of directors and senior management of the Entity.
  - Staff members with responsibility for management and control functions or the Entity's major business units.
  - Those responsible for: legal matters, the soundness of accounting policies and procedures, finance including taxation and budgeting, conducting economic analysis, prevention of money laundering and terrorist financing, human resources, development and implementation of remuneration policies, information technology, information security and management of outsourcing arrangements for critical or important functions.
  - Those responsible for managing the risks referred to in Articles 79 to 87 of Directive 2013/36 and the voting members of the internal committees responsible for managing those risks, in general, and those with voting rights in the products committee, in particular.
  - Those responsible for making, approving or vetoing decisions on credit risks that exceed the limits set out in Regulation 2021/923.
  - Dealers who may take significant market risk positions.
- According to **quantitative criteria**:

- Employees who have received significant remuneration in the previous year, which was above 500,000 euros and equal to or above the average remuneration awarded to directors and senior management, and who perform their duties in a significant business unit and this activity impacts the bank's risk profile.
- Employees who received remuneration of 750,000 euros or more in the previous year.
- Those whose remuneration is among the 0.3% of employees who received the highest total remuneration in the previous year or for the previous year in companies with more than 1,000 employees.
- According to **internal criteria**:
  - Managers with a certain degree of responsibility for credit or market risk in specific units.
  - Senior managers of a business unit with a regulatory licence (bank or securities market).
  - Senior managers identified by one of the qualitative criteria.

The criteria for proportionality were also established in accordance with the current applicable regulations, best practises and market trends, both in terms of the relative importance of the units and the different degrees of responsibility of the positions held by the people assessed.

The composition of this identified staff is revised annually by Bankinter's remuneration committee, which in turn submits the revised list to the board of directors for approval.

The companies forming Bankinter Group participate actively in the identification process, providing all of the necessary information to adequately identify all staff who have a material impact on the Group's risk profile.

As a result of the identification process explained, a total of 107 professionals were classified as identified staff at the close of the 2025 financial year, approximately 1.60% of the workforce.

Nevertheless, Bankinter understands that, in accordance with its current risk management and control structure, no person may make decisions with regard to risks that could compromise the organisation as a whole, its earnings or its capital base, as the decisions must be made by the competent committees (jointly) in accordance with an established delegation scheme.

## 12.4. Characteristics of the remuneration scheme applied to identified staff

Bankinter Group has specific guidelines for identified staff as part of its remuneration policy.

These guidelines consist of:

- The policy and procedure for determining the identified staff, described above, which includes the principles and criteria to identify the individuals who have a material impact on Bankinter Group's risk profile, based on Commission Delegated Regulation (EU) 2021/923 of 25 March 2021, as described above.
- The specific stipulations set out in the general remuneration policy for application to this group as well as in prevailing legislation and the European Banking Authority (EBA) guidelines.
- The application of the remuneration policy to the subsidiaries of Bankinter Group, with the adjustments necessary to comply with local regulatory requirements or to follow the recommendations of their supervisory bodies.

As indicated in previous sections, the board of directors of Bankinter, at the proposal of the remuneration committee, annually analyses and approves, where appropriate, changes to the remuneration policy of Bankinter Group in general, as well as the Remuneration Policy for Directors, in order to keep them aligned with the long-term interests of the shareholders, the strategic objectives of the Group and regulatory requirements. The subsidiaries formally adhere to the Group's remuneration policy, which requires the alignment of their practices with the principles contained therein.

### i. Fixed remuneration of all directors for carrying out supervisory and collective decision-making duties:

The current composition of the board of directors and of its committees can be found on the corporate website.

Remuneration accrued by members of the board of directors for their supervisory and collective decision-making duties consists of an annual fixed amount and does not include variable components. This amount is not subject to the achievement of objectives or linked to performance, in compliance with corporate governance recommendations.

Total remuneration received individually may be satisfied by means of one or more of the three following remuneration items, all of which are included in the Institution's by-laws and the rules and regulations of the board of directors: i) annual fixed amount for membership of the board of directors and chairing its committees; ii) allowances for attending meetings of the board and its committees; and iii) delivery of shares, share options or remuneration indexed to the share price.

As in recent years, the remuneration for financial year 2025 only includes the first two items.

In accordance with Articles 217 and 529 septdecies of the Spanish Companies Act, as part of the current directors' remuneration policy, the Annual General Meeting held in 2025 set a new maximum for annual directors remuneration of three million euros, due to the increase in the number of members of the board of directors from 11 to 12. This amount is applicable individually for financial years 2025 and 2026.

The specific amounts accrued by each director for the items mentioned above are set annually by the board of directors considering the positions held by each member of the board, their attendance of meetings and their committee memberships.

The [annual Directors' Remuneration Report](#), which is available on the corporate website, includes the individual amount paid to the members of the board for the performance of their duties in , along with a description of the amounts to be accrued for each item in 2026.

### ii. Remuneration of the Chairperson of the board of directors:

In Bankinter, since 2013, the chair of the board has had non-executive status, fulfilling non-executive institutional duties (as described in the [annual corporate governance report](#), which is published on Bankinter's corporate website), in addition to their current duties as the chair of the collective body, the latter of which are remunerated in accordance with the scheme in the previous point. The non-executive chair receives only fixed remuneration and no variable remuneration for these duties, in accordance with the criteria set out in the previous point for non-executive directors.

The maximum global fixed remuneration limit of the Chair for these duties during the validity of the aforementioned Policy can be found in the current [Directors' Remuneration Policy](#), which is available on the corporate website.

The [Directors' Remuneration Report](#), which is available on the company's corporate website, includes the individual amount paid to the chair for performance of these duties in 2025.

### iii. Remuneration of executive directors for carrying out executive duties and remuneration of the rest of identified staff:

Bankinter's remuneration policy for directors makes a clear distinction between criteria for setting:

1. basic fixed remuneration, which primarily reflects professional experience and responsibility in the organisation; and
2. variable remuneration, which reflects sustainable and risk-adjusted performance, and rewards the creation of value through the achievement of the objectives in the Group's strategic plans.

### Fixed remuneration

Fixed remuneration constitutes the basic element of the remuneration policy. This concept is in essence linked to the content of the positions and is established on the basis of the degree of responsibility of the position held, as well as the experience, performance and education of the person holding the position.

In addition to the remuneration accrued for membership of the board of directors, executive directors receive annual remuneration, including a fixed component, for their executive duties within the framework of the management agreements that bind them to the Institution.

The maximum limit for global fixed remuneration for executive directors for executive duties can be seen in the current [Directors' Remuneration Policy](#), which is available on the corporate website, for the term of the Policy.

Fixed remuneration for the rest of employees is established taking into account the following aspects:

- **Collective bargaining agreement:** the Bank's collective bargaining agreement foresees a minimum annual salary based on, among other aspects, the employee's job category and length of service.

This remuneration takes precedent over the remuneration scheme prevailing at any time. Therefore, if, by virtue of the collective bargaining agreement, an employee is entitled to remuneration above that set out in the Institution's remuneration framework, the remuneration established in the bargaining agreement will take priority.

- **Job evaluation:** Bankinter's organisational structure and internal job evaluation system comprise a significant pillar in the establishment of internal salary benchmarks.

Job evaluation is a basic component in achieving equity and balance in terms of salary. This process is carried out following an exhaustive analysis of the job position, to place each position in a comprehensive ranking and naming system.

Significant differences between the different positions are the comparative base used for achieving a fair distribution of salaries, thus reducing any arbitrariness.

Whether an employee is situated in one place or another within the evaluation is mainly due to the responsibility attached to the position, which is established on the basis of the professional qualification, the resources managed, the level of risks managed and the job position's relative contribution to the Bank's business objectives.

- **Performance assessment:** this is a systematic process of determining how employees perform their tasks and assume the responsibilities attached to their positions.

The main aims of performance assessment are to: i) improve the management of people, insofar as it helps detect skills, potential and training needs; and ii) to motivate employees, insofar as it recognises and rewards performance.

Performance assessment is a key aspect in defining, within the remuneration based on job evaluation, the trajectory that an employee can follow when it comes to changing position or salary band.

All Bankinter employees are assessed annually by their immediate manager, with the Human Resources Division leading the process.

### Pension scheme:

Bankinter currently has in place a complementary social benefit scheme for executive directors, senior managers and some executives. Currently, in the case of executive directors, only the chief executive officer participates in this system, as detailed in the [Directors' Remuneration Report](#).

Bankinter's pension scheme is a defined contribution plan. To implement it, the Bank has taken out a unit-linked group insurance policy and a guaranteed return group insurance policy covering retirement, death and disability. The rights deriving from these commitments do not vest at the time of termination of the contractual relationship with the Company, but only when one of the aforementioned contingencies is met, in accordance with the policy and regulations of Bankinter's senior management pension plan.

The scheme entails an initial contribution, which is a fixed contribution of the same amount for all beneficiaries; and an annual contribution (after five years have passed from the time of the initial contribution), which varies in accordance with each employee's responsibilities and functional scope. A description of this system can be found in the Directors' remuneration report available on the corporate website.

### Variable remuneration

#### Objectives and principles

The main objective of variable remuneration is to incentivise performance in line with the Company's objectives and to foster solid and effective risk management whereby this variable remuneration does not encourage individual employees to take on excessive risks.

The variable components of Bankinter employees' remuneration takes into account the following principles:

- When remuneration is linked to results, its total amount will be based on an assessment that combines the results of the individual, estimated using both financial and non-financial criteria, the results of the business unit in question and the global results of the Bank.
- Total variable remuneration does not limit Bankinter's capacity to reinforce the soundness of its capital base.
- Given that guaranteed variable remuneration is not compatible with healthy risk management or with the principle of rewarding performance, it does not form part of any of the Bank's remuneration plans.
- Guaranteed variable remuneration is exceptional and can only occur when hiring new staff and where the Entity has a sound and strong capital base, and is limited to the first year of employment.

- Fixed and variable components shall be appropriately balanced in total remuneration. The fixed component shall represent a sufficiently high portion of total remuneration to allow a fully flexible policy on variable remuneration components, up to the point where it is possible not to pay them.
- The allocation of variable remuneration components at the Entity shall take into account all current and future risk types.
- The assessment of performance shall be placed in a multi-year context to guarantee that the assessment process covers long-term performance and that the effective payment of performance-based remuneration components is scaled over a period of time that considers the Bank's underlying economic cycle and business risks.
- When assessing the performance used to calculate variable remuneration components, an adjustment will be made for all types of current and future risks, taking into account the cost of the capital and liquidity required.
- Variable remuneration shall not be paid through vehicles or methods that facilitate non-compliance with regulations on organisation and discipline.
- Retention awards will only be granted in exceptional and justified cases, provided that the relevant retention conditions have been met and there have been no major breaches of regulations or misconduct.

Bankinter has established a series of appropriate ratios between the fixed and variable components of total remuneration, considering the different groups within the Institution.

Nevertheless, the following principles apply to members of identified staff (which includes directors):

- The variable component shall not exceed 100% of the fixed component of each individual's total remuneration.
- However, Bankinter's annual general meeting can approve a higher variable component than this, provided that it does not exceed 200% of the fixed component.

## Type of variable remuneration

<b>Variable remuneration</b>		
<b>Rewarding value creation by achieving the targets in Bankinter Group's strategic plans</b>		
<b>Annual variable remuneration</b>	<p><b>Executive directors, as well as those groups of employees within the identified staff who do not participate in the specific incentives</b></p>	<p>Bankinter defines the same variable remuneration scheme for executive directors and for the rest of the identified staff. The purpose of this variable remuneration is to incentivise the achievement of the targets set by the Bank, in order to ensure proper correlation between the resulting remuneration levels and the performance of the Entity's earnings, as they are directly linked to overall banking activity targets, while at the same time promoting sound and effective risk management practices that prevent such remuneration from creating incentives for excessive risks. The distribution system operates at an individual level, based on assigned duties and responsibilities.</p>
	<p><b>Specific to the commercial network</b></p>	<p>The purpose of the specific incentive is to incentivise the commercial activity of individuals in the core area where the business was generated, aligning their activity with the business strategy and objectives established by Bankinter.</p> <p>This is <b>conceived for employees who perform commercial tasks</b> and those who lead commercial teams, as they are responsible for the commercial activities of the teams and for applying the commercial strategy. Overall, the amount of the incentive can be broken down into two sections according with the following:</p> <ul style="list-style-type: none"> <li>▪ The first is linked to commercial objectives based on the position.</li> <li>▪ The second is linked to the banking business results of the Group and the profits at the centre where the employee works, based on indicators for each financial year.</li> </ul>
	<p><b>Specific to concrete areas</b></p>	<p>This applies to the following areas: Treasury and Capital Markets, Risks, Investment Banking, Financial and Market Analysis, Bankinter Asset Management and Bankinter Consumer Finance.</p> <p>The objectives pursued by this structure of incentives, depending on the corresponding area of activity, are as follows:</p> <ul style="list-style-type: none"> <li>▪ Ensure the independence of the division vis-à-vis the areas it serves.</li> <li>▪ Maintaining a senior-level experienced team, considering the importance of intellectual capital, preventing the temptation to achieve short-term results at the expense of properly managing incurred risks.</li> <li>▪ Correlating the incentive system with the area's specific activity and its contribution to the business.</li> <li>▪ Assigning the incentive to the contribution of each employee and achievement of the established objectives.</li> </ul>
	<p><b>Control areas</b></p>	<p>The indicators established for the accrual of variable remuneration in these areas are directly related to their control activities and are independent of the references used for the areas they control.</p>
<b>Multi-year variable remuneration ("LTI 2024-2026")</b>	<p>A long-term variable remuneration system applies to executive directors, other directors and key personnel of Bankinter Group.</p> <p>Following the changes previously indicated to the board of directors, the Bank has embarked upon a new phase, involving the design of an ambitious strategic plan.</p> <p>This new strategic plan for the Group covers the 2024-2026 period and constitutes an ambitious but clear roadmap for the creation of long-term value and development for the Bank over the coming years in a way that is sustainable over time and in line with the interests of Bankinter's stakeholders: our shareholders, customers, employees and society as a whole.</p> <p>To ensure and achieve the maximum motivation, loyalty, commitment, alignment and dedication of the Bank's key staff to achieving the objectives established in the aforementioned strategic plan, the board of directors, at the proposal of the remuneration committee, at its meeting in July 2024, approved a new long-term incentive (LTI 2024-2026), for which the measurement period is 3 years, also taking into account the suggestions and recommendations made by investors and proxy advisors.</p> <p>The objectives and characteristics of this Plan are described in the <a href="#">Directors' Remuneration Report</a>, which was submitted for consultative approval by the Annual General Meeting in 2025.</p> <p>Given its purpose, this plan is additional to the other variable remuneration plans in existence at this time.</p>	

### Adjustment of variable remuneration to sustainability indicators:

It should be noted that variable remuneration for the identified staff is determined by applying very demanding indicators. These are fully aligned with the Bank's risk profile and are essential for the sustainability of the bank in the long term.

To do this, the calculation of variable remuneration is carried out in three phases:

- **First phase:** fulfilment of the annual and multi-year targets is assessed based on the indicators established for each case.
- **Second phase:** variable remuneration calculated based on the above indicators is adjusted by the risk appetite framework (hereinafter, RAF) indicators aligned with metrics that adequately reflect the most significant risks, including ESG risks.

**These indicators can reduce the accrued variable remuneration to zero and never increase it.**

Since 2023, in response to investor and stakeholder expectations, Bankinter has added a new indicator to its RAF, measuring its impact on the decarbonisation of the economy through the financing extended by the Bank to its customers, applying the same robustness and approval criteria as it applies to the rest of its indicators.

Therefore, to adjust the variable remuneration accrued in 2025, Bankinter has used six RAF indicators, as in the previous year, two of which are related to environmental and social objectives: financed emissions and the customer NPS.

Each indicator has a defined objective, tolerance and limit that are approved by the board of directors at the proposal of the risk and compliance committee. Each indicator is measured quarterly, so there are four measurements per year for each indicator. Non-compliance with the tolerance and limit levels will result in a penalty being applied to the accrued variable remuneration, and may even adjust it to zero.

Section 2.3.3.2 of the [Directors' Remuneration Report](#) describes the RAF indicators associated with adjustment of the variable remuneration accrued in 2025.

- **Third phase:** variable remuneration is adjusted by the RoE TTC, based on the scale that the board, on the recommendation of the risk and compliance committee, decides at any given time, with a view to creating long-term value and ensuring the Bank's development in the coming years is sustainable over time and aligned with the interests of shareholders.

**These three stages apply to both annual variable remuneration and multi-year variable remuneration. The second and third stages involve ex ante adjustments.**

The design of the variable remuneration system fully responds to Bankinter's firm commitment to long-term sustainability in all areas, a commitment that translates into the use of robust, long-lasting indicators, controlled and verified by the bank's control areas and external auditors.

### Characteristics of variable remuneration 2025

Section 2.3.3.2 of the [Directors' Remuneration Report](#) describes the specific characteristics and targets for the variable remuneration awarded to executive directors, both annual and multi-year, as well as the characteristics of the ex ante adjustment of accrued variable remuneration, in accordance with the RAF indicators.

The degree of achievement of the objectives to which accrued annual variable remuneration was linked in 2025 (both general and applicable to executive directors, among others) is described in section 3.1. of the [Directors' Remuneration Report](#). No multi-year variable remuneration was accrued.

**The following are the clauses to which the variable remuneration of executive directors is currently subject:**

Accrued variable remuneration is subject to the following clauses:

Clauses to which the final variable remuneration accrued is subject.	
<b>Deferral</b> A substantial part will be deferred for a period of 5 years.	<b>Payment in shares</b> A substantial part will be paid in Bankinter shares. (at least 50% of the deferred portion and 50% of the non-deferred portion)
<b>Prohibition of hedging transactions</b> Neither on shares pending delivery nor on shares already delivered	<b>Share retention period</b> 1 year from each delivery
<b>Ex-post adjustments</b> Reduction (malus) and return (clawback) clauses are applicable to 100% of the amount granted	

In accordance with Law 10/2014 of 26 June on the regulation, supervision and solvency of credit institutions, the variable remuneration of the members of the Identified Staff, which includes executive directors, including the deferred portion, shall only be paid or vested if it is sustainable in accordance with the financial situation of the institution as a whole, and if it is justified on the basis of the results of the institution, the business unit and the individual concerned.

The malus or clawback clauses are explicit ex post risk adjustment mechanisms by means of which Bankinter adjusts the remuneration of the members of the Identified Staff. The Group has a remuneration repayment policy and a procedure for the application of reduction clauses applicable to the identified staff, which defines the cases in which these clauses may be applied, including: i) evidence of misconduct or serious error by the Identified Staff member; ii) if Bankinter's and/or the business unit's financial results subsequently suffer a significant decline; iii) if Bankinter and/or the business unit in which the Identified Staff member works commits a material risk management failure; iv) significant increases in the

regulatory or economic capital base of the business unit or Bankinter; v) regulatory sanctions to which the conduct of the Identified Staff member has contributed.

As in the previous year, in the case of shares corresponding to variable remuneration from years prior to 2021, the original gross number of shares to be delivered needs to be adjusted in the manner approved by Bankinter's board of directors in order to mitigate the impact on the share price of the stock market floatation of Línea Directa Aseguradora, S.A. This meant the delivery of 1.28379 shares for each share pending delivery.

In accordance with regulations, the entity benefits from the exception of applying the deferral and payment in shares requirements to members of the identified staff whose annual variable remuneration does not exceed 50,000 euros and does not represent more than one third of their total annual remuneration. Fifty-seven members of the identified staff benefit from this exception. The total aggregated remuneration of these employees was 9,483 thousand euros, comprising 8,092 thousand euros in fixed remuneration and 1,391 thousand euros in variable remuneration.

#### Termination benefits:

The compensation, if any, payable to members of the identified staff will be based on results achieved over time and shall not reward poor performance or inappropriate behaviour and shall be subject to the provisions of Bankinter Group's general remuneration policy in force from time to time.

In general, severance payments, including post-contractual non-competition agreements, shall be considered variable remuneration for all purposes and shall be subject to the remuneration policy applicable to the members of the Identified Staff and, in particular, for the calculation of the ratio of the application of the deferral, malus and clawback provisions in accordance with the rules in force at a given time. Notwithstanding the foregoing, the amounts of severance payments shall not be taken into account for the calculation of the ratio, the application of the deferral provisions and the payment in instruments that comply with the provisions of Bankinter's remuneration policy.

In any case, there is no right to receive severance payments relating to changes of ownership of the Entity.

In the case of the President and the other non-executive directors, no compensation has been established in the event of termination for any reason.

The severance payments for executive directors established in the contract signed with the Company are based on the relationship with the Entity prior to being appointed chief executive officer apply. They only apply in cases similar to those defined in the Workers' Statute (Estatuto de los Trabajadores) for ordinary employment relations. There is also a severance limit that may not, under any circumstances, exceed the limit provided for in employment regulations for all Bankinter staff.

## 12.5. Quantitative information on the remuneration policy

The tables below, REM1, REM2, REM3, REM4 and REM5, contain information on the remuneration policy at year-end 2025, in accordance with Article 450 of Regulation (EU) No 575/2013, modified by CRR3, and Regulation (EU) No 2024/3172:

### Special payments to staff whose professional activities have a material impact on the risk profile of the institution (identified staff) (REM2)

	a	b	c	d
	Oversight function of the management body	Management function of the management body	Other senior management	Other identified staff
<b>Guaranteed variable remuneration granted</b>				
1	Guaranteed variable remuneration granted - of identified staff members			
2	Guaranteed variable remuneration granted - Total amount			
3	Of which: guaranteed variable remuneration paid during the financial year, which is not taken into account when capping bonuses			
<b>Severance payments granted in previous periods and paid during the year</b>				
4	Severance payments granted in previous periods and paid during the year. Number of members of the identified staff			2
5	Severance payments granted in prior periods and paid during the year - total amount			61
<b>Severance payments granted during the year</b>				
6	Severance payments granted during the year. Number of members of the identified staff			7
7	Severance payments granted during the year - total amount			1
8	Of which: paid during the year			2,515
9	Of which: deferred			679
10	Of which: severance payments paid during the year that are not taken into account when capping bonuses			679
11	Of which: highest compensation awarded to a single person			1,139
			679	

Figures in thousands of euros

## Remuneration granted for the year (REM1)

		a	b	c	d	
		Oversight function of the management body	Management function of the management body	Other senior management	Other identified staff	
1		Number of members of identified staff	10	2	9	86
2		Total fixed remuneration	2,271	2,908	4,267	17,216
3		Of which: in cash	2,244	2,894	4,089	16,342
EU-4a		Of which: shares or equivalent ownership interests				
5	Fixed remuneration	Of which: equity-linked instruments or equivalent non-cash instruments				
EU-5x		Of which: other instruments				
7		Of which: other forms	28	14	178	874
9		Number of members of identified staff		2	9	86
10		Total variable remuneration		774	2,240	6,947
11		Of which: in cash	–	334	1,406	5,404
12		Of which: deferred	–	157	272	617
EU-13a		Of which: shares or equivalent ownership interests	–	377	681	1,544
EU-14a		Of which: deferred	–	200	272	617
EU-13b	Variable remuneration	Of which: equity-linked instruments or equivalent non-cash instruments	–	–	–	–
EU-14b		Of which: deferred	–	–	–	–
EU-14x		Of which: other instruments	–	–	–	–
EU-14y		Of which: deferred	–	–	–	–
15		Of which: other forms	–	63	152	–
16		Of which: deferred	–	63	152	–
17	Total remuneration (2+10)		2,271	3,682	6,506	24,163

Figures in thousands of euros

#### Remuneration of 1 million euros or more per year (REM4)

		a
Euros	Identified staff with high remuneration within the meaning of Article 450(i) of the CRR	
1	From 1 m to less than 1.5 m	2
2	From 1.5 m to less than 2 m	1
3	From 2 m to less than 2.5 m	1
4	From 2.5 m to less than 3 m	–
5	From 3 m to less than 3.5 m	–
6	From 3.5 m to less than 4 m	–

#### Information on the remuneration of staff whose professional activities have a material impact on the institution's risk profile (REM5).

	a	b	c	d	e	f	g	h	i	j	
	Remuneration of the management body			Business areas							
	Oversight function of the management body	Management function of the management body	Total management body	Investment banking	Retail commercial banking	Asset management	Corporate functions	Independent internal control functions	All others	Total	
1	Total members of identified staff									107	
2	Of which: members of the management body									10	
3	Of which: other senior management									2	
4	Of which: other identified staff									12	
5	Total remuneration of identified staff									–	
6	Of which: variable remuneration									–	
7	Of which: fixed remuneration									–	
	2,271	3,682	5,954	2,246	11,802	1,888	5,347	2,880	6,506		
	–	774	774	992	3,605	707	1,097	547	2,240		
	2,271	2,908	5,179	1,254	8,197	1,181	4,250	2,333	4,267		

Figures in thousands of euros

## Deferred remuneration (REM3)

	a	b	c	d	e	f	g	h
Deferred and retained remuneration	Total amount of deferred remuneration granted in respect of previous performance periods	Of which: vested during the year	Of which: vesting in subsequent years	Amount of the performance adjustment applied in the year to deferred remuneration to be vested in the year	Amount of the performance adjustment applied in the year to deferred remuneration to be vested in future years	Total amount of adjustment during the year due to implicit ex post adjustments (changes in the value of deferred remuneration due to changes in instrument prices)	Total amount of deferred remuneration granted prior to the year and actually paid in the year	Total amount of deferred remuneration granted in respect of prior performance periods that has vested but is subject to withholding periods
1 Oversight function of the management body	–	–	–	–	–	–	–	–
2 In cash	–	–	–	–	–	–	–	–
3 Shares or equivalent ownership interests	–	–	–	–	–	–	–	–
4 Equity-linked instruments or equivalent non-cash instruments	–	–	–	–	–	–	–	–
5 Other instruments	–	–	–	–	–	–	–	–
6 Other forms	–	–	–	–	–	–	–	–
7 Management function of the management body	4,329	790	3,539	–	–	194	984	436
8 In cash	1,588	332	1,255	–	–	–	332	–
9 Shares or equivalent ownership interests	2,189	457	1,732	–	–	194	651	436
10 Equity-linked instruments or equivalent non-cash instruments	–	–	–	–	–	–	–	–
11 Other instruments	–	–	–	–	–	–	–	–
12 Other forms	552	–	552	–	–	–	–	–
13 Other senior management	4,709	915	3,794	–	–	218	1,133	387
14 In cash	1,932	445	1,487	–	–	–	445	–
15 Shares or equivalent ownership interests	2,006	470	1,536	–	–	218	688	387
16 Equity-linked instruments or equivalent non-cash instruments	–	–	–	–	–	–	–	–
17 Other instruments	–	–	–	–	–	–	–	–
18 Other forms	771	–	771	–	–	–	–	–
19 Other identified staff	12,265	2,950	9,315	–	–	608	3,558	1,251
20 In cash	5,987	1,459	4,528	–	–	–	1,459	–
21 Shares or equivalent ownership interests	6,149	1,491	4,658	–	–	608	2,099	1,251
22 Equity-linked instruments or equivalent non-cash instruments	–	–	–	–	–	–	–	–
23 Other instruments	–	–	–	–	–	–	–	–
24 Other forms	129	–	129	–	–	–	–	–
25 Total amount	21,303	4,654	16,648	–	–	1,020	5,675	2,074

Figures in thousands of euros

# 13

## Environmental, Social and Governance (ESG) Risks



## 13. Environmental, Social and Governance (ESG) Risks

### 13.1. Information on the main ESG risks

According to Article 449a of Delegated Regulation (EU) 575/2013, institutions shall disclose information on environmental, social and governance risks (ESG risks) including physical and transitional risks. The details of the information to be published are set out in Implementing Regulation (EU) 2022/2453 of 30 November 2022.

### 13.2. Sustainability strategy

Over the past decade, Bankinter Group has demonstrated a strong commitment to sustainability, integrating environmental, social and governance (ESG) criteria into its corporate strategy. The lines of action of this strategy are structured under sustainability plans, such as 'Noughts and Crosses' Plan (2012-2015 / 2016-2020), 3D Plan (2021-2023) and the DNA Plan (2024-2026). These plans seek to promote sustainable and inclusive development, aligning with the corporate values of agility, enthusiasm, integrity and originality. Thanks to these initiatives, Bankinter Group not only contributes to protecting the environment, but also fosters a positive impact on the society and economy of the countries where it operates.

The bank has been publishing sustainability reports periodically for more than a decade (called non-financial information statements since the entry into force of Law 11/2018 on non-financial information and diversity). In this way, Bankinter Group guarantees transparency and monitoring of its progress in this area.

#### Sustainability policy

In May 2025, the board of directors approved a new update to the Group's Sustainability Policy, proposed by the sustainability and appointments committee as the body responsible for advising and making recommendations to the board on matters covered by this policy, as well as for ensuring that non-financial and diversity information is made public.

The Sustainability Policy defines the framework within which Bankinter Group integrates the Bank's values – Agility, Enthusiasm, Integrity and Originality – along with the principles of responsible management into its activities to create economic, social and environmental value.

This Policy is the main reference for managing the Bank's environmental, social and governance (ESG) aspects and covers the management of all IROs identified as material. It takes a comprehensive approach to ensuring the identification and management of the most relevant IROs, aligning with the requirements of the CSRD and the sub-topics outlined in this directive.

Each of the principles established in the Sustainability Policy addresses, in a cross-cutting manner, the different sub-topics defined in the regulatory framework, thus guaranteeing

that the material IROs linked to areas such as climate change, people management, customer relations and corporate governance are reflected in the Bank's strategic guidelines.

In the 2025 update, some of the principles have been redefined and structured within each of the three dimensions of sustainability (environmental, social, and governance), defining the lines of action in each of them, as well as the instruments to implement them (strategic plans, associated objectives, communication channels, and training and skills development).

The Policy applies to all entities that make up Bankinter Group and reflects the commitment to align with international protocols and standards such as the United Nations 2030 Agenda Sustainable Development Goals and the Paris Agreements, among others. Bankinter is also a signatory to alliances and standards such as the United Nations Global Compact Guiding Principles, the Equator Principles, the Principles for Responsible Banking and the United Nations Environment Programme Finance Initiative. These frameworks reinforce Bankinter Group's commitment to sustainability and its integration into the corporate strategy.

Bankinter Group also considers the opinions and expectations of its stakeholders as a core element in its development and implementation. To this end, the Bank carries out periodic materiality analyses, through which it identifies and prioritises the most relevant sustainability issues, integrating the perspectives of its main stakeholders. The principles of this policy are published on Bankinter Group's corporate website and are available to all stakeholders.

#### 2024-26 DNA Sustainability Plan

Sustainability plans are the instrument that the Bank implements to deploy its Sustainability Policy. For the structuring of this Plan 2024-26, the following references, among others, were considered:

- The Spanish Companies Act and Law 11/2018, of 28 December, on non-financial information and diversity.
- Directive (EU) 2022/2464 of the European Parliament and of the Council on corporate sustainability reporting (CSRD, Corporate Sustainability Reporting Directive)
- Delegated Regulation (EU) 2023/2772 supplementing Directive 2013/34/EU of the European Parliament and of the Council with regard to sustainability reporting standards (ESRS).
- The recommendations included in the Code of Good Governance of Listed Companies approved by the CNMV.
- The commitments that Bankinter Group has signed within the framework of various international initiatives, including, among others, the Guiding Principles of the United Nations Global Compact, the Equator Principles, the Principles for Responsible Banking and the initiative for the financial sector of the United Nations Environment Programme and Net-Zero Banking Alliance (NZBA).
- Analysis of the results of assessments by leading ESG analysts and rating agencies.

- International standards and frameworks relating to Sustainability management (GRI, IIRC, ISO 26000, SGE 21, etc.).
- Analysis of the results of satisfaction surveys completed by stakeholder groups such as customers and employees.
- The goals associated with the Sustainable Development Goals (SDG).
- Consideration of best practices from global industry leaders.
- Materiality analysis carried out in 2023.

The DNA Sustainability Plan 2024-26 is made up of 3 pillars:

- **"A" is for responsible action.** It focuses on the Bank's ethical management and its commitment to responsible and transparent business practices. Its strategic lines are corporate governance, ethics and transparency, human rights and supply chain.
- **"D" is for differentiation.** The Bank positions itself as an organisation with distinctive core values, thanks to its provision of innovative solutions with the best available technologies, such as artificial intelligence, recognised quality service, and advanced people management. The strategic lines linked to differentiation are: customer relations, people management, sustainable innovation and relations with the local community.
- **"N" is for sustainable business ("negocios" in Spanish).** It covers aspects related to Bankinter Group's business from a sustainable perspective, incorporating new business opportunities that arise for the Bank, and also addresses ESG risks. The strategic lines linked to this pillar are sustainable finance, climate change, natural capital and cybersecurity.

The achievement of business objectives must be compatible not only with regulatory compliance, but also with the development of best practices and national and international standards required for its activity. The Strategic Plan also serves to comply with regulatory requirements in terms of sustainability and following recommendations from international advisors, such as sustainability rating agencies and corporate responsibility observatories.

The plan's objectives related to new ESG-related business opportunities are noteworthy, as they are closely linked to the bank's inclusive strategy with its clients, to help them in the transition to a more sustainable and low-carbon economy.

## 2024-2026 DNA Sustainability Plan



### Action

Strategic pillar "A", which corresponds to "Responsible action".

Strategic lines:

- Corporate governance
- Ethics and transparency
- Human rights
- Supply chain



### Differentiation

Strategic pillar "D", which corresponds to "Differentiation".

Strategic lines:

- Customer relations
- People management
- Sustainable innovation
- Relationship with the local community



### Business

Strategic pillar "N", which corresponds to "Sustainable business" (in Spanish, 'Negocio sostenible').

Strategic lines:

- Climate change risks
- Natural capital risks
- Cybersecurity risks
- Sustainable finance/opportunities



## Key milestones for 2025

Over the last few financial years, Bankinter Group strengthened its sustainability function, providing it with greater resources, placing it under the direct hierarchical dependence of the Chairman's Office of Bankinter Group and under the supervision of the sustainability and appointments committee. Thus, this board committee adopts the functions of reviewing the Strategic Sustainability Plan, monitoring the strategy and supervising the performance of the Group's ESG indicators, monitoring the dialogue with stakeholders, evaluating ESG risks and ensuring the public dissemination of non-financial and diversity information.

With this organisation, Bankinter Group seeks to respond to the growing challenges in terms of sustainability. Specifically, the sustainability function is aimed at meeting the following objectives:

- Promote the identification, evaluation and capture of value creation opportunities arising from the sustainable transition in both the environmental and social dimensions.
- Lead Bankinter Group to the highest level in the sustainability standards defined by the European Union.
- Ensure complete and rapid adaptation to current and future regulatory and supervisory requirements.
- Transmitting Bankinter Group's contribution to ESG concerns to its numerous internal and external stakeholders.

On the occasion of the publication of the CSRD, the development of the ESRS (European Sustainability Reporting Standards), and the associated EFRAG (European Financial Reporting Advisory Group) guidelines, Bankinter Group carried out a double materiality analysis in 2024, which has been reviewed and updated during 2025. The process of this exercise is detailed in section 1.2 Double Materiality Exercise, and as a result of the update, grouping, and reclassification, 30 material impacts, risks, and opportunities (IROs) have been identified in the areas of climate change (ESRS E1), own employees (ESRS S1), consumers and end users (ESRS S4), and governance (ESRS G1), compared to the 43 identified in 2024.

Based on the development of the double materiality analyses under these new standards, Bankinter has carried out an alignment of the DNA Plan to this new exercise, prioritising initiatives, standardising metrics, structuring control processes, and providing additional monitoring of the lines of work in the Group's subsidiaries. In this way, the progress made in the DNA Plan respond to the material issues identified under the new methodology.

Some of the main milestones achieved in 2025 in sustainability, included in the strategic lines of the DNA Plan, are set out below.

In the area of **Responsible Action**, as described above, Bankinter Group has carried out an update of the double materiality analysis in accordance with the current sustainability reporting requirements.

Furthermore, Bankinter Group has updated some of the relevant policies within the Group, such as the Sustainability Policy and the ESG Risk Integration Policy in investment decisions.

In addition, an ambitious ESG training plan has been implemented across the entire workforce, and work related to critical sustainability aspects has continued to be included in internal audit plans.

In the **Differentiation** pillar, both in Spain and Portugal, the healthy company certifications and ISO 45001 occupational health and safety certifications have been renewed.

The Bank has also continued to promote financial education through various programmes such as the digital platform Money Town, the project "Your Finances, Your Future" together with the Spanish Banking Association (AEB, for its acronym in Spanish), the Game of Traders game for students and workshops on financial education adapted for the elderly and people with intellectual disabilities. Furthermore, a global customer service protocol has been created and the customer recommendation indicator (NPS) has continued to improve.

Accessibility in corporate buildings has also continued to be enhanced, and corporate well-being programmes, such as the "Bankinter Te Cuida" programme, have been strengthened.

In **Sustainable Business**, Bankinter has placed a strong focus on developing business with ESG criteria through the launch of new products for companies (Energy Saving Certificates advance loan) and individuals (eco-renovation loan and energy efficiency simulator), distribution agreements for sustainable mobility and self-consumption, advisory services for decarbonisation, and the structuring and coordination of green and sustainable bonds.

Alongside commercial developments, Bankinter Group has also advanced in managing climate and environmental risks to align with the expectations of the European Central Bank.

In this area, it is worth highlighting the fulfilment of the decarbonisation roadmap for the corporate book, achieving a 15.6% reduction in emissions financed per million euros, with respect to 2024 (more details are included in section 2.2.3 Action).

Furthermore, Bankinter has approved and published interim decarbonisation targets to 2030 for the most emissions-intensive sectors, in line with the Paris Agreements and UNEPFI recommendations, with the ultimate objective of achieving climate neutrality by 2050.

During this year, Bankinter has updated its sustainable finance marketing framework, as well as its green bond framework.

Finally, it is noteworthy that the bank's Environmental Management System has been re-certified according to ISO 14001, and the corporate carbon footprint calculation has been externally verified in accordance with ISO 14064.

## A strategy recognised by the market

Bankinter's sustainability management was once again recognised in 2025 by the Bank's continuing place in the main sustainability indices (Dow Jones Best-in-class Index and the FTSE4Good). Meanwhile, sustainability rating agencies such as MSCI, Sustainalytics and ISS upgraded Bankinter's rating with respect to 2024.

## 13.3 Environmental risk

### 13.3.1. Business strategies and processes

Bankinter remains firmly committed to environmental management by taking on the challenge and responsibility of operating in the most environmentally friendly manner, taking the necessary measures to mitigate its direct and indirect climate and environmental impact, in line with the precautionary principles. To this end, analyses of the most relevant climate and environmental risks throughout Bankinter's value chain are performed, both Bankinter's own direct risk (the Bank premises where its employees work) and the indirect risks deriving from its financial activity. It manages all of these risks in accordance with the principles of prevention and involving all stakeholders.

The Sustainability Policy is the main reference for managing the Bank's environmental, social and governance (ESG) aspects and covers the management of all IROs identified as material. This policy takes a comprehensive approach to ensuring the identification and management of the most relevant IROs, aligning with the requirements of the CSRD and the sub-topics outlined in this directive. Each of the principles established in the Sustainability Policy addresses, in a cross-cutting manner, the different sub-topics defined in the regulatory framework, thus guaranteeing that the material IROs linked to areas such as climate change, people management, customer relations and corporate governance are reflected in the Bank's strategic guidelines. More information on this policy is provided in section 1.4.2 The Group's Commitment to Sustainability.

Bankinter also has a complementary policy specifically focused on the management of environmental and climate issues, the Environmental and Climate Change Policy. This Policy aims to establish the framework for the Group's action in matters of the environment and climate change in all its activities and constitutes the reference framework for establishing improvement objectives. This Policy addresses the management of the material IROs identified in the ESRS E1 topics, including climate change mitigation and adaptation, as well as energy management.

Monitoring and control of the Environmental and Climate Change Policy corresponds to:

- The sustainability committee, which is responsible for promoting and supervising the implementation of this Policy, must report on its follow-up to the sustainability and appointments committee of the board of directors.
- The Sustainability division, which is responsible for coordinating the actions defined in the Environment and Climate Change Strategy Guidelines and Programmes, verifying the level of compliance with the established goals and identifying areas for improvement, according to internationally recognised standards, regulations, guidelines and the proposal for adopting instruments to implement this policy.

In preparing this policy, Bankinter has taken into account the provisions of European and Spanish legislation and other international standards. These include the UNE-EN ISO 14001 International Standard for Environmental Management Systems (EMS), the UNE-EN ISO 14064 International Standard for Greenhouse Gases and other recognised environmental reporting standards for the preparation of non-financial reports.

The policy is public on the usual communication channels, both external and internal, on the Corporate Website and on the Bank's Intranet.

The document was last updated in 2022. This policy is aimed at enhancing the positive impacts and minimising the negative effects of its activity on the environment. In addition, it was adapted to new regulations such as the Climate Change Law or the Sustainable Finance Taxonomy Regulation, its coverage was expanded to the management of aspects derived from financial activity and references were incorporated to the international frameworks that have been developed in recent years and which the Bank takes into account when managing its environmental dimension (Sustainable Development Goals, Paris Agreement on climate change, among others).

The Sustainable Business pillar of the DNA Sustainability Plan includes a strategic line associated with climate risks, included in a general category of ESG risks. In addition, the management of the Bank's environmental footprint is incorporated through the environmental management and carbon footprint calculation system (through which both the direct and indirect environmental impacts generated by the Bank's activity are identified, measured and controlled).

#### Transition plan

In January 2026, Bankinter's sustainability and appointments committee approved the bank's ESG Transition Plan, in response to the requirements set out in the EBA guidelines on ESG risk management. This plan covers the key contents described in the annex to the guidelines, namely: strategic objectives, quantitative targets and metrics, governance, implementation strategy, and engagement strategy. An implementation roadmap has also been prepared, describing the initiatives associated with the plan's implementation strategy, a tentative implementation timetable, and the investments incurred and planned.

#### Strategic levers on exposure to polluting sectors

Bankinter is not excluded from the European Union benchmarks harmonised with the Paris Agreement. The Institution is a signatory to the main international initiatives in the area of sustainability, such as the Equator Principles, the Global Compact, the sectoral initiative of the United Nations Environment Programme (UNEP FI) and the Principles for Responsible Banking. The latter is a framework established to conduct sustainable banking activity in line with the SDGs and the 2030 Agenda. In addition, Bankinter has defined a decarbonisation roadmap for its corporate business and mortgage book, with reduction targets to 2030 for emissions financed, as well as specific targets for the most carbon-intensive sectors (see Decarbonisation Strategy section).

The Group has little exposure to the sectors that emit the most greenhouse gases. An alert system (climate rating) has been put in place for the individual impacts of these risks on each customer and transaction, and dialogue has been established with the customers with the highest emissions, which is considered in proposal and approval processes. Furthermore, this exposure will be progressively reduced in accordance with the commitments undertaken by the bank, the book and sectoral decarbonisation targets, and the strategic decision to support customers in transitioning their business towards a lower-emission economy.

In addition, the Bank has defined sector-specific financing guidelines, with social and environmental criteria, for certain sectors that are considered more relevant due to their potential social or environmental impact, including the energy, agricultural, extractive and defence sectors. These sectoral guidelines, specifically those for the energy and extractive sectors, were updated in 2024. Bankinter is progressively becoming more demanding in relation to compliance with decarbonisation targets, limiting the financing of activities incompatible with emissions reduction (see Decarbonisation Strategy section).

Banks have a responsibility to help finance the transition to a sustainable economy, as facilitators of credit. However, this transformation process also requires other types of incentives and certainties regarding the technology to be targeted that do not depend on the financial sector. Therefore, the Group's decarbonisation will largely depend on compliance with the national objectives set, as recognised in the strategy itself.

Likewise, Exclusion Criteria in Investment Decisions have been defined and approved, with the objective of setting limits and/or preventing investment in companies whose activity is associated with "controversial activities" (see Management of Material IROs in Investment section).

### Strategic levers for climate change mitigation actions

As a financial institution, Bankinter recognises its role in climate change mitigation efforts and focuses on supporting and facilitating financing for its customers. This corresponds to Scope 3 of its carbon footprint, which accounts for more than 95% of the Group's emissions. However, Scope 1 and 2 emissions are monitored under environmental management systems and annual carbon footprint declarations and verifications.

Regarding scope 3, that is, the emissions that the Bank finances for its customers, work has been done on the design of products with ESG criteria that help customers in their transition plans. One of the pillars of the Bank's Sustainability Plan is sustainable business, aimed at promoting the financing of activities that contribute to climate change mitigation and adaptation, whether for individuals or legal entities and in any geography, with the objective of supporting customers in their decarbonisation strategies and transition to lower-carbon business models. The actions taken in this regard are specifically detailed in the "ESG Business" section.

### 13.3.2. Governance

As regards to the specific governance of climate change risks and opportunities, the bodies involved are the following:

The **board of directors** is the body that approves the Group's Sustainability Policy. In 2023, Bankinter reviewed and approved the proposal entitled "Business with ESG Criteria", which incorporated the Business Plan for products that include ESG criteria, with the aim of assisting customers in their decarbonisation pathways and other sustainability objectives. This plan has subsequently become part of the responsibilities of the Bank's Sustainability area. It is supported by the following committees that form part of the administrative body:

- The **sustainability and appointments committee**, which assumes responsibilities in matters of sustainability, including:
  - Review the Sustainability Policy, ensuring that it is always geared towards value creation.
  - Monitoring of the sustainability strategy and practices, best practices in this area, and evaluation of their degree of compliance.
  - Evaluate everything related to the social, environmental, political and reputational risks of the company, independently of the powers corresponding to the risk and compliance committee or to other board committees. Specifically, this body is the one that approves the decarbonisation roadmap for the Bank's books in accordance with the commitments made in its Sustainability Policy.
- The **audit committee** ensures the clarity and integrity of the non-financial information that the Bank must make public periodically.
- The **risk and compliance committee** exercises oversight functions in risk matters and is the main support to the board in this area. Specifically, it is responsible for reviewing the proper compliance with the risk appetite declaration, which includes all material risks. In November 2022, the risk and compliance committee submitted a proposal to the Bank's board of directors advising it to incorporate the "Emissions Financed" indicator, which measures the impact on decarbonising the economy through financing granted by the Bank to its customers, into Bankinter Group's risk appetite framework (hereinafter, RAF). Furthermore, the risk and compliance committee receives a recurring report on the management and control of all material risks, including a global monthly report that includes all material risks and, specifically, those related to climate and the environment, in addition to monitoring compliance with the risk appetite statement.
- The **remuneration committee**. In Bankinter Group, the variable remuneration of the personnel categories whose activities have a material impact on the risk profile of Bankinter ("identified staff"), which includes board members, is adjusted based on the specific RAF indicators, as determined by the board of directors, as suggested by this committee, in line with metrics that suitably reflect the most significant risks, including environmental, social and governance risks. The remuneration committee proposed to

the board of directors the incorporation of this new RAF indicator (decarbonisation pathway of emissions financed for the corporate book), to adjust the accrued variable remuneration in 2023 for the identified group (including that accrued by executive directors). As with the other RAF indicators that can adjust the variable remuneration of identified staff, non-compliance with the risk tolerance and limits will result in adjustment of the accrued variable remuneration, and may even reduce it to zero. (See more information in section 1.3.2 Alignment of remuneration policy with ESG objectives)

Bankinter's board of directors agreed to approve both proposals from its oversight committees on 22 February 2023 (for more information, consult the Annual Report on Director's Remuneration, which is available on Bankinter's corporate website).

Since 2022, joint committees between the aforementioned board committees have been held, where considered necessary.

The following bodies should also be highlighted:

- Risk committees. Analyses and approves risk transactions proposed by the branch network that should consider climate change as a risk factor in each transaction.
- Reporting directly to the non-executive chairman of the board of directors:
  - The sustainability committee ensures compliance with the Sustainability Policy and the development of successive Sustainability Plans, ensuring their dissemination and seeking the involvement of all Bankinter stakeholders, especially strategic ones (staff, shareholders, customers, etc.)
  - The Sustainability division, which is tasked with ensuring the Group's ongoing leadership in sustainability while responding to growing regulatory, supervisory and competitive pressures. It includes those responsible for sustainability in areas that are especially involved and functionally dependent on the Sustainability division, at two levels:
    - Areas with exclusive and independent responsibility: Climate risks, CSR and ESG management in Portugal
    - Managers in business areas (including subsidiaries) and territorial organisations.
- Other internal bodies or working groups on sustainability:
  - Green bond committee: analyses the potential book for green issue collateral and monitors live emissions.
  - Sustainable Labelling Unit: a newly created internal unit set up to mitigate the risk of "greenwashing" in financing that qualifies as green and is linked to sustainability.

### 13.3.3. Risk management

Bankinter is developing its sustainability strategy to minimise the negative impacts that its activity may have on its social and environmental surroundings and to enhance the positive ones. This strategy is transversal and involves all areas of the Bank and therefore all its businesses. Bankinter identifies the aspects of its activity that have the greatest impact on the environment through a management system for the needs and expectations of its main stakeholders.

As previously mentioned, Bankinter updated its the double materiality analysis during 2025, based on the analysis conducted in the previous year and following the guidance of the EFRAG IG1 Materiality Assessment. In this way, material IROs on which to focus sustainability reporting have been identified.

The phases followed were context analysis, definition of the value chain, identification of IROs and the assessment of both impact materiality and financial materiality.

Bankinter used internal exercises and reports, insofar as they were available for the different categories of IROs, so that this double materiality analysis was in line with the Bank's own management and strategy, and the material IROs obtained reflected the company's reality.

For this reason, in the specific analysis of risks related to climate change, Bankinter has taken into account the "risk assessment" exercise conducted to respond to the European Central Bank's Thematic Review, which analyses how different prudential risks (credit, market, liquidity, operational, and reputational) are affected by climate risk factors (transition and physical) across various time horizons. This exercise is explained in more detail in the next section.

In the case of impacts, the general methodology has been followed, that is, based on severity and probability.

#### Materiality

To assess the materiality of climate change risks, Bankinter carries out exercises to quantify the effects that climate change can have on the different traditional risks and, therefore, the potential losses that it can have on its business. In conclusion, Bankinter considers these risks to be material, based on the assessment of their impacts as described below.

Climate risks are considered 'risk factors'. This means that they do not have an impact in themselves, but they do materialise through the risks traditionally managed by financial institutions. Specifically, in credit, market, operational, reputational and liquidity risks.

They also impact the business model over the medium and long term, depending on the extent to which the Bank's business involves sectors and markets vulnerable to these risks.

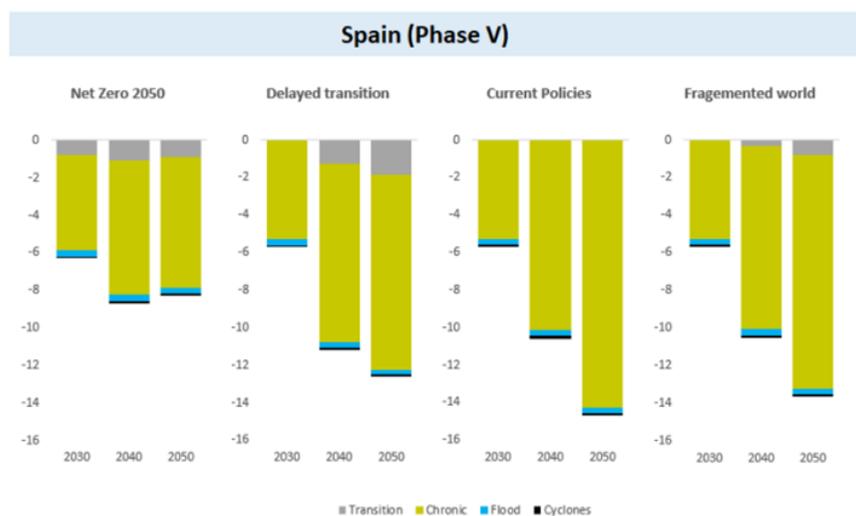
Climate risks are therefore considered as a cross-cutting source of risk, included in each of the risk categories described below.

The assessment of the potential impacts of these risks is carried out from a dual perspective:

## Top-down approach

One of the most important references in relation to the potential economic damage that climate and environmental risks can cause is the set of contents published by the Network for Greening the Financial System (hereinafter, NGFS). This association of central banks and supervisors is making a major effort to establish a common framework of scenarios and associated impacts, which provides us with a very solid basis on which to build our impact analyses and, consequently, to determine the materiality of climate factors, especially with regard to credit risk. In November 2024, this organisation published the so-called Phase V of its scenarios, the most relevant novelty being the incorporation of a new damage function that gives enormous prominence to physical risks.

The following graph shows the impacts on GDP for Spain, in terms of cumulative growth differential, of physical and transition risks in four scenarios that we take as a reference for the years 2030, 2040 and 2050 with respect to a theoretical scenario in which climate effects are ignored:



These Phase V impacts correspond to the NiGEM NGFS v1.24.2 model [REMIND-MAGPIE 3.3-4.8]<sup>5</sup>, adding those associated with flooding and cyclones that come from Phase IV (NiGEM NGFS v1.23.2 model [Climate Analytics]<sup>6</sup>).

The narrative describing these four scenarios considered is summarised in the following points:

- **Orderly:** this is the desired scenario and represents an orderly transformation through effective policies and innovation to reach the goal of net zero CO<sub>2</sub> emissions by 2050, keeping the temperature increase to 1.5°C. Since this is an orderly scenario, not only are physical risks mitigated to the maximum, but those associated with the energy transition are kept at moderate levels.
- **Disorderly:** in this scenario, effective actions to reduce emissions are delayed until 2030 and therefore it is necessary to introduce urgent measures that cause a temporary energy shock. To a certain extent, although on a different scale, this is what is currently happening as a result of the Ukraine conflict and its effects on energy prices. Therefore, by acting late and in a disorderly manner, both the impact of transition risks and physical risks is greater, limiting the temperature increase to 2°C.
- **Hot House World:** this scenario assumes that current policies are maintained, which causes emissions to continue to grow and, therefore, leads to greater exposure to physical risks. However, transition risks are not considered in this context.<sup>7</sup>
- **Fragmented World:** a delayed and divergent political response is assumed between different countries, which ultimately results in ineffective action where high transition risks coincide with a limited capacity to reduce emissions. This scenario seems plausible given the current geopolitical tensions, as well as a probable change of plans in the US under the Trump administration. In fact, in early 2025 all major US banks abandoned the Net Zero Banking Alliance.

As can be seen, even in the best of scenarios, physical risks have a material impact on the economy as a whole. In addition, acute physical risks can concentrate their impacts over short periods of time, in specific geographic areas, as well as in specific activities.

Bankinter uses these scenarios to assess potential future impacts both in terms of losses associated with stress situations and in terms of capital needs.

On this basis, in 2024 financial year, Bankinter carried out a Materiality Analysis of Climate and Environmental Risks, studying the different impacts, under the hypothesis of realisation of the different scenarios on traditional risks such as credit, operational, reputational, market and liquidity risks. The methodology used involves:

- Defining the "risk drivers" or transmission channels of each risk
- Defining time horizons
- Conducting a qualitative analysis of the potential impact of climate risks on traditional risks
- Conducting a quantitative analysis of each of these.

<sup>5</sup> For more details, see the document NGFS Climate Scenarios Technical Documentation V5.0 (November 2024)

<sup>6</sup> For more details, see the document NGFS Climate Scenarios Technical Documentation V4.1 (November 2023)

<sup>7</sup> In this scenario, a financial risk of NON-transition could be considered; i.e. a risk derived from excessive exposure to projects that, without a real transition, will not achieve the expected return values in their business plans.

This exercise has been carried out for all the Bank's geographies and businesses and for the first three climate scenarios<sup>8</sup> stated in three time horizons, in accordance with the horizons established in exercises such as the ICAAP and the recommendations of the EBA (European Banking Authority) for this type of analysis related to climate risks: short term, medium term and long term.

The impact assessment is carried out using a severity scale from 1 to 5:

Severity	High	Medium-High	Medium	Medium - Low	Low
Impact	5	4 - 4.9	3 - 3.9	2 - 2.9	0 - 1.9

The assessment carried out on the possible impact of climate risks on each of the traditional risks is detailed below.

#### Credit risk

Climate risks (physical and transition) can have an impact on credit risk because they increase the probability of non-payment or non-compliance by borrowers with respect to their obligations to Bankinter, due to a reduction in their income as a result of a climate event. Specifically, these three Bankinter books may be affected:

- Mortgage book: they may lead to a reduction in the value of the assets that serve as collateral.
- Financing for individuals with personal guarantees: these may affect borrowers and therefore increase the risk of default on their financial obligations.
- Financing to companies: some economic sectors are particularly vulnerable to climate risks, such as agriculture, construction, energy or insurance. Companies in these sectors may see their productivity and business models affected or their supply chains interrupted if these risks materialise.

The analysis of the impact of climate risks on credit risk has been carried out taking into account the book distribution data detailed above and transition and physical risks.

Transition risk can impact credit risk mainly through climate policies/regulations, investor/customer behaviour and technological development requiring higher capital investments. For the qualitative analysis of its impact through credit risk, a theoretical exercise is carried out to identify the transmission channels through which climate risks can impact the three loan books and the impact and probability of occurrence that they could have in the three defined time and climate horizons is evaluated.

Regarding physical risks, they can affect credit risk mainly through extreme weather events, such as floods, forest fires, earthquakes and other natural disasters, which impact the value of assets and the payment capacity of customers. To analyse this impact, the transmission channels of physical risk in the Bank's three loan books are identified, considering the

probability of occurrence and the potential impact of these risks in different time horizons and under the three climate scenarios.

#### Market risk

Physical and transition climate risks may impact market risk, affecting these Bankinter books:

- Trading Book + Banking Book: some economic sectors are particularly vulnerable to climate risks, both physical and transitional, such as agriculture, construction, energy or insurance. Bonds issued by companies in these sectors may be at risk if any of these risks materialise.
- Non-trading Book: physical risks, such as natural disasters, can deteriorate the credit quality of assets in Non-Trading Book portfolios, increasing defaults and reducing the value of collateral. However, transition risks, arising from regulatory and economic changes towards a low-carbon economy, may affect specific sectors where the financial institution has exposure, increasing the risk of credit losses and adjustments in asset valuation.

Transition risks can impact market risk by affecting the value of financial assets linked to carbon-intensive sectors or those not aligned with the climate transition. Changes in regulatory policies, technology or investor preferences can cause sudden adjustments in the prices of these assets, increasing the volatility of investment portfolios. Furthermore, an accelerated or disorderly transition could generate significant losses in fixed and variable income instruments, affecting the market position and financial results of the bank. To analyse these effects, the vulnerability to climate transition risk of each of the sectors with exposure in the two books is assessed, the vulnerability of each sector is obtained and multiplied by its exposure.

Physical risk can impact market risk by altering the value of financial assets related to sectors or regions vulnerable to extreme weather events, such as floods or droughts. To carry out the qualitative analysis of the impact of physical risk on market risk, the vulnerability to climate risk of each of the sectors with exposure in the two market portfolios (Trading Book + Banking Book and Non-trading Book) is assessed. Once the vulnerability of each sector is obtained, it is multiplied by its exposure.

In order to estimate the quantitative impact of climate risks on market risks, these books, mostly composed of securities issued by public or financial institutions, have been analysed using a tool that establishes climate ratings on each issuer, stressing it in terms of climate scenarios and time frames and using qualitative analysis as the basis.

#### Liquidity risk

Climate risks (physical and transition) can impact liquidity risk due to a reduction in asset quality, an increase in non-performing loans, an increase in cash demands and even a loss of value in the bank's exposed sectors. Specifically, climate risk can affect the four books in the following ways:

<sup>8</sup> The Fragmented World scenario can be seen as a combination of the Delayed Transition and Current Policies scenarios, so it has not been considered necessary to incorporate it in this analysis.

- Deposits: withdrawal of large amounts of cash to cover immediate needs.
- Wholesale financing: wholesale markets are increasingly focused on sustainability. If Bankinter does not adequately manage climate risks or does not align its strategy with ESG principles, it may lose support from institutional investors.
- Loans: in loans, affecting borrowers, asset quality and the Bank's ability to manage its liquidity.
- Collateralised assets: a reduction in the value or availability of collateral assets may limit the Bank's liquidity.

For the qualitative analysis of transition risk in liquidity risk, each risk driver has been analysed and assigned a severity according to ECB guidelines, and an average is then applied together with the probability of occurrence.

For the qualitative analysis of physical risk in liquidity risk, each risk driver has been analysed and assigned a severity according to the ECB guidelines and the Think Hazard tool and then an average is applied to it along with the probability of occurrence, considering the exposure in each of the geographies where Bankinter is exposed to liquidity risk (Spain, Portugal, Ireland and Luxembourg).

Regarding the quantitative assessment of the possible impacts of climate risks on the Bank's liquidity risks, the effects of a possible reduction in customer deposits or greater investment provisions as a result of climate events or transition risks on the LCR ratio have been analysed. The conclusions are that this ratio, in the different time frames and scenarios, would always remain within the minimum levels set out in Bankinter's Risk Appetite Framework. It is also concluded that these risks are not material for Bankinter.

#### Operational risk

Climate risks can affect a Bank's operational risk. Extreme natural events, such as floods or hurricanes, can damage key infrastructure, disrupting operations and technology services. Additionally, stricter climate regulations may require complex operational changes, increasing the risk of errors and associated costs. In addition, disruptions in the supply chains of critical suppliers due to climate events or their inability to adapt to the transition can impact business continuity.

In this regard, three main areas of impact of operational risk have been identified in the bank:

- Financial: quantifies the economic loss that would be caused by the interruption of the analysed activity.
- Operational: the interruption of activity can have an impact by increasing the workload of other areas, reducing or paralysing their activity and requiring investment to restore adequate levels of service.
- Legal or litigation: any way in which stopping the process could result in legal action against Bankinter is being considered.

Transition risk can impact operational risk by requiring costly adaptations to processes and systems to comply with environmental regulations. Furthermore, disruptions in supply chains and shifts in customer preferences towards sustainable products can strain internal resources, creating inefficiencies and operational vulnerabilities.

Climate risk through physical risk can impact the financial institution, legally and operationally.

- Financial impact: local operating costs are taken into account to determine the proportional weight of each geography in the financial impact of physical risks.
- Operational impact: the number of branches per country will be taken into account to determine the proportional weight of each geography in the operational impact of business continuity of physical risks.
- Legal impact: the number of customers will be taken into account to determine the proportional weight of each geography in the legal impact of physical risks.

The calculation of the physical impact on operational risk is carried out through an approach that includes the identification and analysis of multiple factors. First, the severity of the impact is assessed by geography, considering financial, business continuity and legal areas.

To do this, the Think Hazard tool is used, which allows for the analysis of each of the relevant risk drivers, such as floods, droughts or extreme events, in the regions in which Bankinter operates.

A weighted average is then calculated that combines the identified severity with the probability of occurrence of the events under different climate scenarios. This detailed analysis considers how operational, legal and financial exposure varies across geographies, allowing for a more accurate calculation of potential impact and yielding results that integrate both the magnitude and likelihood of physical risk in each context.

Regarding the quantitative assessment of operational risks, physical and transition risks have been assessed. For physical risk, the loss has been estimated using as a reference the losses that occurred with the DANA in Valencia. For transition risk, the maximum (very high impact in the most adverse scenario) is taken as the average of fines imposed on banks in recent years for misrepresentation or erroneous disclosure in ESG and climate risk matters, and the proportion is calculated with the ratio of the size of these banks to that of Bankinter.

#### Reputational risk

Climate risks (physical and transition risks) may impact reputational risk due to the perception that different stakeholders may have regarding Bankinter's actions in climate matters, both in relation to the financing of certain carbon-intensive activities and due to its collaboration and commitment to the transition. In this regard, specifically, although physical and transition climate risks may impact the Bank as a whole, the reality is that financing certain industries that are more sensitive to reputational risk may have a greater effect on Bankinter's reputation. For this reason, exposure to different sectors of activity has been taken into account within this qualitative analysis.

To calculate the impact of transition risk on reputational risk, different variables have been defined to assess the severity of each of the risk drivers initially defined. Here are some examples of those analysed:

- Possible sanctions for non-compliance with regulations, adverse publications by official bodies that may result in reputational damage if the Bank is involved in legal actions
- Financing customers with unsustainable practices can damage the Bank's reputation, resulting in less financing capacity.
- Practices that are not sustainable or not aligned with their corporate and strategic objectives goals (inappropriate investment, inadequate or insufficient ESG product catalogue, controversial comments from spokespersons, expulsion from or downgrading in sustainability indices, environmental media controversies) can damage their reputation, leading to a loss of demand or investment.
- Lack of transparency and information reported regarding compliance with sustainability objectives and climate and environmental commitments (Greenwashing)

To calculate the impact of physical risk on reputational risk, the same methodology has been followed as for transition risk, defining a variable for the evaluation of the severity of each risk driver and its defined severity to complement it with its probability of occurrence according to the defined scenarios.

For example, regarding the risk driver of an inability to adequately anticipate the risks associated with extreme weather events, the calculation of the severity of the impact has been carried out by taking the reputational impacts obtained in the BIAS conducted by the Bank for the different areas. Subsequently, the different reputational impacts in the different geographies of the Group have been taken into account and the weighted average value of reputational impact for all of them has been assigned.

To quantify climate risks on reputational risk, the losses from an extreme event with a reputational impact associated with the governance dimension have been analysed. These types of events could be associated with climate factors linked to greenwashing or, directly, to a non-compliance with our own policies. In the most extreme cases, the impact of these events could be significant for the Bank.

### Conclusions

The results obtained from the qualitative analysis for the climate transition risk in the different scenarios and time frames are shown below collectively:

	CLIMATE TRANSITION RISK								
	ORDERED			DISORDERED			HOT HOUSE WORLD		
	S/T	M/T	L/T	S/T	M/T	L/T	S/T	M/T	L/T
Credit Risk	3.4	3.3	2.7	2.5	3.3	3.3	2.2	2.2	2.3
Reputational Risk	3.2	3.2	2.9	2.3	3.2	2.8	1.7	1.7	1.8
Operational Risk	2.7	2.8	2.9	2	2.2	2.4	1.5	1.5	1.8
Liquidity Risk	2.2	1.9	1.7	1.7	1.9	2.2	1.7	1.4	1.4
Market Risk	1.8	1.8	1.7	1.8	1.8	2.1	1.6	1.6	1.6

These results are consistent with previous analyses carried out at Bankinter and are also supported by the bottom-up approach described below. Most of the values obtained are low or medium-low, except for credit and reputational risks, where in some scenarios and time frames average results are obtained.

The risk of transition is obviously greater in scenarios that assume a transformation towards a sustainable global economy, with differences in the timeframes between an orderly and therefore early transition, compared to a late transition.

In any case, the results obtained in the qualitative assessment of transition climate risks on credit risks are conditioned by the low exposure in Bankinter's loan book to sectors of activity that emit high levels of greenhouse gases, such as agriculture or oil & gas, even in the activity of electricity generation, where more than 77% of the exposure is through direct financing of renewable energy projects.

Regarding the results obtained on physical risks, they are presented in the following table where a hypothetical lack of action against climate change would increase their materiality, especially in the long term:

	CLIMATE PHYSICAL RISK								
	ORDERED			DISORDERED			HOT HOUSE WORLD		
	S/T	M/T	L/T	S/T	M/T	L/T	S/T	M/T	L/T
Credit Risk	2.4	2.6	3.0	2.5	3.4	3.3	2.5	3.4	4.3
Reputational Risk	1.8	1.8	1.8	1.8	2.3	1.8	1.8	2.3	2.3
Operational Risk	1.9	2.4	2.9	1.9	2.7	3.0	1.9	2.7	3.7
Liquidity Risk	1.4	1.9	1.4	1.4	1.9	1.9	1.4	1.9	2.4
Market Risk	1.6	1.6	1.7	1.6	1.8	2.1	1.7	1.9	2.3

In this case of physical risks, credit risk is also the one most affected by climatic factors. In this qualitative analysis, taking into account the worst-case scenario and the long term, operational risk would also be affected (medium impact), although it is understood that given that the Bank's branch network is not very extensive and is concentrated in large urban centres, as well as the certified business continuity system implemented, it would be correctly mitigated.

It should be noted that the bank is updating this materiality analysis, incorporating a quantitative analysis of the influence of climate change risks on prudential risks, which will be reported in future reports.

## Bottom-up approach

The bottom-up approach consists of assessing how both the Bank itself and its customers are specifically exposed to climate risks. Both perspectives are closely related; they must be consistent in the sense that the potential events must be the same and must complement each other.

However, this view cannot lead to the assumption that the effects can be isolated to certain sectors of activity or to regions more exposed to certain physical risks:

- A modern economy implies an enormous interrelation between different productive activities. Thus, cost increases that may arise from the materialisation of certain risks may end up spreading through the value chains. This fact has been observed quite clearly as a consequence of the war in Ukraine and, specifically, how the supply shock in both fossil energy and commodities caused inflationary tensions that were transferred to all sectors of activity.
- There are sectors that are considered strategic and that have historically received support in order to avoid the negative externalities of excessive foreign dependence. One of them is the primary sector and the energy sector could also be highlighted. It is unacceptable that these sectors are subject to their own fate and that, therefore, efforts to preserve them in a context of increased vulnerability are not maintained.

An approach aimed at concentrating the physical risk on the property or the activity directly affected, which could compromise the solvency of the owner or holder of this, does not fully respond to reality, which is somewhat more complex. Firstly, it should be noted that the risks associated with natural disasters should tend to be mutualised due to both their great uncertainty and the high severity of their effects. It cannot be ignored that, for example, in Spain, there are powerful mitigation instruments such as the Insurance Compensation Consortium, Agri-insurance or the declaration of a catastrophic zone.

The effect of mutualisation of damages must therefore be considered with regard to acute physical risks. This also leads to the mutualisation of climate change adaptation investments for mitigation. But what is clear is that, globally, acute physical risks represent uncertainty and destruction, and this has a potential effect on the economy as a whole, which is what is revealed in the top-down approach.

Thus, from this bottom-up approach, climate factors are considered to have moderate impacts on business for the following reasons:

- The Bank has little exposure to the sectors that emit the most greenhouse gases (as will be explained in the section on measuring emissions financed). An alert system (climate rating) has been put in place for the individual impacts of these risks on each customer and transaction, and dialogue has been established with customers with the highest emissions, which is considered in proposal and transaction screening processes (refer to the Climate rating for legal entities section).

Furthermore, this exposure will be reduced in line with the Bank's commitments, such as its membership of the Net Zero Banking Alliance initiative, the decarbonisation

targets for its book, and the strategic decision to help customers in the transition of their businesses to a low-emission economy.

- Exposure to potentially destructive physical hazards, such as flooding, is very low. In addition, the properties used as collateral are required to be insured. Acute risks such as droughts and heat waves have a more general effect that can compromise the normal development of certain activities and economic growth as a whole, but their impact is much more distributed among debtors.

In any case, it must be stressed that the low exposure to certain particularly sensitive activities does not insulate the bank from the general damage that climatic factors can cause, especially in scenarios where action to reverse global warming is insufficient or even non-existent.

## Risk management in financing

Bankinter has implemented specific policies designed to manage the most relevant material impacts, risks and opportunities (IROs) in relation to its business activity and climate change. These policies cover core aspects related to financing and investment, two key areas where numerous material IROs are concentrated. They address issues such as climate change mitigation and adaptation, energy efficiency and the deployment of renewable energy projects – restricting financing for more carbon-intensive sectors while promoting those with lower environmental impact, as detailed in the sectoral policy for the energy sector, which is further elaborated in this chapter. Firstly, policies and procedures have been developed focused on business lines related to the financing of both legal entities and individuals. Secondly, specific policies have been established aimed at business activities related to investment.

Regarding the IROs relating to the Bank's financing activities, Bankinter has sustainable financing principles included in the Risk Framework Agreement, as well as sectoral policies or guidelines that establish the framework for action in financing in particularly controversial or risky sectors, and whose social and environmental impact can be significant.

The sectors identified as controversial are the defence sector, the extractive sector, the agricultural sector and the energy sector. Other exclusion criteria, independent of the sector, are also included, such as respect for fundamental human rights, respect for labour rights, the fight against corruption, the protection of areas included in the UNESCO World Heritage List and the United Nations list, and respect for current legislation. These policies also constitute a key basis for the management of IROs associated with the Bank's risk management, since the established exclusions are linked to companies that present high levels of risk.

Bankinter bases its policies on various international recommendations and principles, including the United Nations 2030 Agenda and its 17 Sustainable Development Goals, the Paris Agreement and the European Commission's Action Plan to finance sustainable growth. It adheres to the Equator Principles, the United Nations Global Compact and other key initiatives such as the Universal Declaration of Human Rights and the ILO's key conventions (International Labour Organization). In addition, it follows the guidelines of the IFC

(International Finance Corporation) and the UNEP (United Nations Environment Programme) Finance Initiative, considering protected areas and critical habitats.

Bankinter is committed to following these guidelines and their correct application, as well as to their ongoing review. The Bank's risks units and business units must comply with these guidelines.

In 2024, Bankinter Group's Sustainable Finance Classification Criteria (SFCC) were developed, regulating the procedure and criteria that a financing operation must meet to be classified and labelled as sustainable. These criteria ensure a homogeneous and standardised methodology for the entire Group, allowing the correct identification and disclosure of financial products and services related to sustainability. The policy applies to all Bankinter Group financing operations, without specific exclusions.

The SFCC are reviewed and updated periodically to reflect developments in applicable regulations, market sustainability criteria and Bankinter Group's own activities. Modifications to the SFCC are approved by the product committee, at the proposal of the Sustainable Labelling Unit or of the product committee itself or one of its members. Bankinter's governance framework consists of a dual organisational structure that serves to analyse, supervise and approve the sustainable environment.

- The products committee is responsible for the approval of the CCFS and their development documents within the sustainable product marketing framework, as well as for new products that Bankinter considers eligible as sustainable at any given time, in accordance with the regulatory environment and applicable market practices.
- The Sustainable Labelling Unit (SLU), made up of a multidisciplinary team, is responsible, among other functions, for approving sustainable labels for Bankinter's non-standard operations and the subsidiaries identified in the SLU regulation.

The SFCC create a classification system based on the European Taxonomy and the international standards defined in the Green Loan Principles issued by the LMA (Loan Market Association), LSTA (Loan Syndications and Trading Association), the Green Bond Principles issued by the ICMA (International Capital Market Association), the Sustainability Linked Loan Principles issued by the LMA (Loan Market Association) and the LSTA (Loan Syndications and Trading Association) and the Sustainability Linked Bond Principles issued by the ICMA (International Capital Market Association).

During 2025, an update of the CCFS was carried out with a dual objective. Firstly, to incorporate certain regulatory clarifications and simplifications regarding compliance with the DNSH (Do not significant harm). Secondly, to incorporate new products and services developed by the bank into the labelling process, such as the green ICO lines, the ESC advance loan, or partnerships for marketing self-consumption systems with renewable energy or electric mobility.

An extract of these criteria is published on Bankinter's corporate website and is available to all stakeholders.

The Sustainable Labelling Unit, introduced previously, is managed through the Sustainable Labelling Unit Regulations (SLU). The main objective of this Regulation is to define the rules of operation, composition and powers of the UMS within Bankinter Group. The regulations establish the standards for the correct labelling and classification of sustainable financial operations, including the definition of key terms such as "Green Customer", "Sustainable Finance Classification Criteria (SFCC)" and "Sustainability Linked Finance". The SLU is responsible for ensuring that operations comply with established technical and regulatory criteria and for periodically evaluating the sustainability objectives and key performance indicators reported in contracts signed with customers. The SLU has jurisdiction over Bankinter as a Group, including all its subsidiaries.

Among the key documents related to the financing business, the Guide for the Structuring of Sustainability-Linked Financing stands out, whose main objective is to establish clear internal guidelines for structuring this type of financing, defining key concepts and specific requirements for its development. This guide defines sustainability-linked financing as financing instruments whose economic characteristics may vary depending on whether or not the debtor achieves predetermined, ambitious, material and quantifiable sustainability objectives. The aim is to support and encourage companies to improve their sustainability profile. The guide establishes the procedures and requirements for the structuring, origination and approval of this financing, including the selection of Key Indicators and the calibration of Performance Objectives.

Bankinter also has a Green Bond Framework to regulate the issuance of green bonds. This framework was updated in 2025 to align with the latest version of the GBP: (Green Bond Principles) published by the International Capital Market Association (ICMA), as well as the internal sustainable finance classification documents mentioned above. Six categories of eligible projects have been included: renewable energy, green buildings, circular economy, pollution prevention and control, green mobility, and energy efficiency.

The framework has a Second Party Opinion from Sustanalytics, achieving maximum alignment with the Green Bond Principles.

### **Risk management in investments**

The policies described in this section constitute the reference framework for managing the material IRO defined as "Increase in GHG (Greenhouse Gas) emissions from financing and investment books due to a higher volume of assets or exposure to carbon-intensive economic activities" with respect to investment activity. These policies complement the set of previously described policies applicable to financing activity in managing identified material IROs and help address key aspects such as climate change mitigation and adaptation, energy efficiency, and the promotion of renewable energy projects, through the application of exclusion criteria and the integration of ESG risks into investment decision-making processes.

During 2025, Bankinter Group updated the policies applicable to the investment business line, aiming to strengthen the integration of sustainability criteria in investment and advisory decisions.

In this context, General Exclusion Criteria applicable to investment and advisory decisions have been developed. These criteria apply to Bankinter, S.A., and Bankinter Group companies engaged in the following reserved activities: the management and administration of collective investment schemes and pension funds, discretionary book management, and investment advisory. The objective is to avoid investing in companies whose business is fully or partially associated with the so-called "controversial activities". These activities are characterised by generating a high negative impact in environmental or social terms due to the resources they consume, the waste they generate, the impact of the goods or services they produce on the environment or on society and/or the bad practices they apply in the management of their human resources.

To define the exclusions and for their subsequent application, analysis and monitoring, Bankinter uses information provided by specialised external suppliers. The implementation of this policy involves coordination between the Regulatory Compliance department, the Asset Manager Risk Management department, the Investment Services Business team, the Front Office department, and the Sustainability department. The risk and compliance committee is responsible for approving these criteria.

Additionally, in 2025, the Group updated the Policy on Integration of Sustainability Risks in Investment and Advisory Decision-Making, expanding its scope of application. This policy establishes the principles, scope, and governance framework that govern the integration of relevant, material, or potentially material sustainability risks into investment processes and advisory on savings and investment products, with the objective of improving transparency and information provided to end investors. The policy aims to develop investment activity responsibly and encourage customers to progress towards a transition aligned with future challenges and sustainable development, describing how sustainability risks are integrated into decision-making processes.

The sustainability area, together with the business teams, is responsible for updating this policy, which is approved by the board of directors upon proposal by the risk and compliance committee.

This policy complies with the requirements of the Sustainable Finance Disclosure Regulation (SFDR) and the MiFID II Directive.

The policy is available to stakeholders on Bankinter Group's corporate website, where it is published and kept up to date.

### **Strategy in relation to ESG risk management**

Among the principles declared for the proper management and control of risks is Bankinter's responsibility to society, which is manifested through various lines of action. Prominent among them is the stimulation of sustainable development which enables the objectives agreed by the United Nations to be met and which, specifically, promotes the preservation of the environment and compliance with the commitments to mitigate the effects of climate change.

Thus, In October 2021, the bank's board of directors approved the basic approach of the bank's strategy for ESG risks, in accordance with EBA criteria: integration into the

sustainability policy, scenario analysis, setting and monitoring of long-term objectives (portfolio decarbonisation path) and sustainable financing products. The bank has accordingly established four lines of work: Identification and measurement, Assessment, Action, and Monitoring.

Each of these will be reviewed in the following sections.

### **13.3.4. Identification and measurement**

Identifying and measuring climate risks is the starting point. At present, information is scarce and there are few measurements, with only incremental improvements. A lot of the data we have to work with are estimates and speculation. The Bank is continuously supplementing this information with more rigorous and detailed information as the state of the art develops. However, this is highly dependent on the introduction of regulatory initiatives to significantly improve disclosure by financial and non-financial companies of information related to sustainability (specifically, the NFRD and CSRD directives).

In this regard, work is being done to measure how the risk derived from climate change can affect the Bank's main books: Corporate & SME Banking and mortgage book.

This analysis of climate risks and resilience to them does not exclude any relevant part of Bankinter's value chain, nor any material physical or transition risk.

#### **Corporate book**

The main indicators that help us to measure how this risk can impact the Bank's Corporate & SME customers are the measurement of emissions financed, the internal climate rating and the measurement of physical risks.

- **Emissions financed**

This measurement is carried out using the PCAF (Partnership for Carbon Accounting Financials) methodology, which is now commonly used by other financial institutions, for calculating the emissions financed by the Bank, and is used to estimate the emissions financed by Bankinter for its corporate book for Spanish and Portuguese resident companies.

The estimation procedure is summarised in the following points:

1. When information is available on emissions declared by the customer (generally through their Statement of Non-Financial Information), the emissions are allocated to Bankinter based on the weight of the funding provided in relation to the customer's total liabilities.
2. When the emissions declared relate to the consolidated Group and there is no individual information, the emissions are allocated to the entire group of companies within the consolidation scope.
3. However, in specific activities such as financing renewable energy projects, emissions are adjusted according to the specific purpose of the financing.

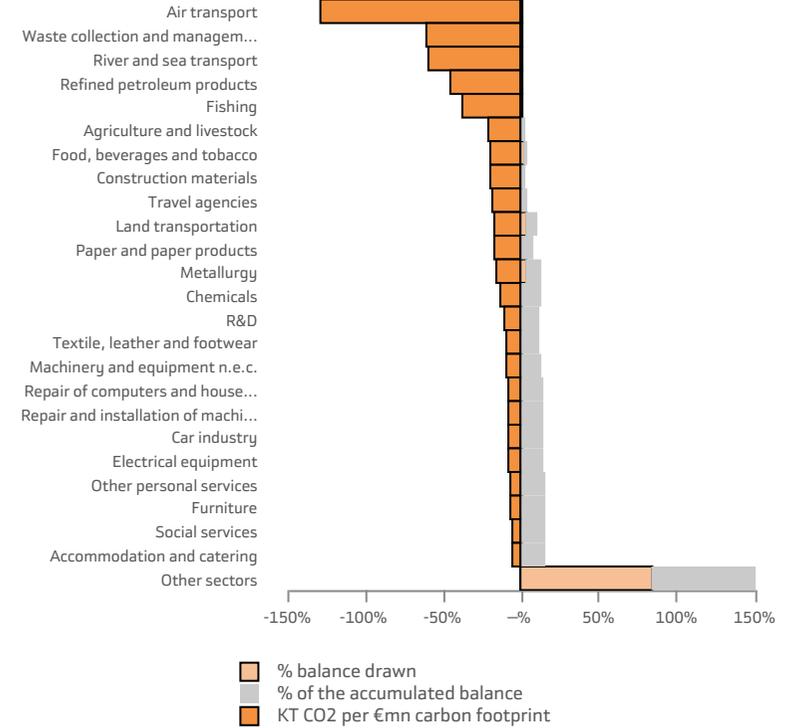
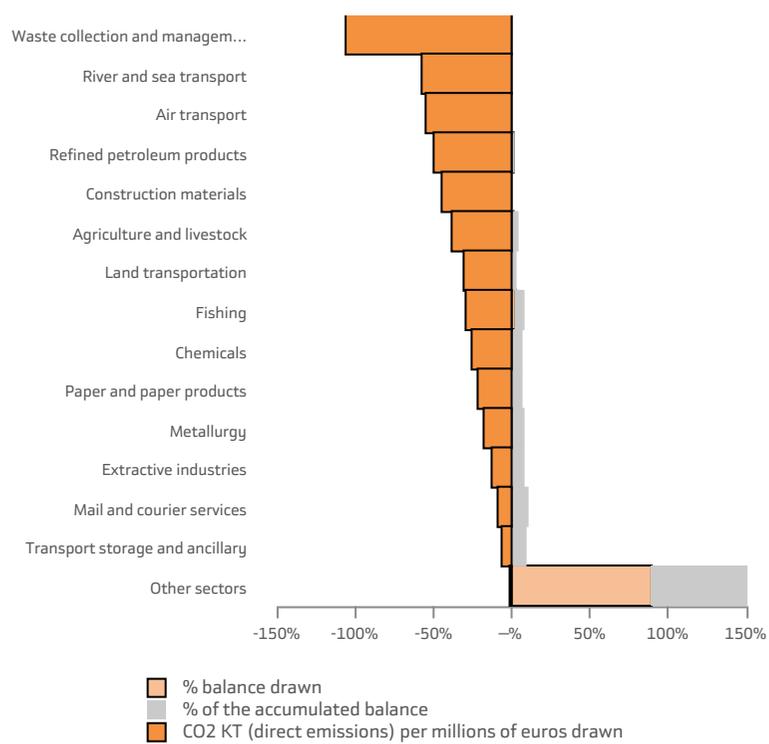
4. Finally, there is an estimation procedure that is applied when individual borrower emissions are not available and which also serves as a tool for monitoring the quality of the emissions data disclosed. For this purpose, the following information is used:

- Emissions from each sector, annual data from the Spanish and Portuguese National Statistical Institutes.
- The revenue of each customer and percentage "share" of the total sector, based on turnover and output data by areas of activity published by the National Statistics Institutes.
- The ratio of bank debt to total balance-sheet liabilities for each customer.
- The percentage indebtedness of each customer with Bankinter compared to the total, using CIRBE data.
- Based on this information, the estimated emissions of each customer are calculated as follows:
  - A total volume is attributed in accordance with the emissions of the sector in which it operates and the proportion that its turnover represents with respect to the total turnover of said sector.
  - This total volume attributed to the customer is weighted by the percentage that bank financing represents of its liabilities. This is then multiplied by the share of that debt corresponding to Bankinter.
  - By aggregating the emissions financed attributed or estimated for each customer, the figures for each sector of activity and for the overall corporate book can be obtained.

This procedure applies to scope 1, 2 and 3 emissions. Scope 2 emissions are estimated by propagating the emissions of the electricity sector throughout the value chains using the input-output tables for the Spanish and Portuguese economies. Scope 3 emissions are estimated in a similar way, but considering the spread of all emissions originating in the different sectors. This enables us to calculate the carbon footprint associated with each customer's activity, including the accumulated emissions in the products to meet final demand. The great advantage of this concept is that it avoids the overlap that exists between the three scopes, which are not directly aggregable.

The Bank also made further refinements to this calculation in 2023 by incorporating the emissions data published by the companies required to do so. At the end of 2025, the share of companies providing non-financial information reached 17.1% of the risk-weighted corporate book (16% in 2024). Bankinter periodically compiles published data on the emissions of these companies on a monthly basis and incorporates them into its measurements. The charts below, which are updated on a monthly basis and included in the Global Risk Report, represent the intensity of direct emissions and the carbon footprint by activity sectors, in descending order, adding the distribution of balance drawn.

## Intensity of direct emissions and carbon footprint by activity sectors



The conclusion is that at the end of 2025 Bankinter financed 0.57% of direct emissions in Spain and Portugal (productive activities) and 0.60% of their carbon footprint, with a volume of 43.1 tonnes of CO<sub>2</sub> and 45.4 tonnes of CO<sub>2</sub> equivalent in terms of direct emissions and carbon footprint, respectively, for every million euros of balance drawn down.

This represents a decrease compared to the close of the 2024 financial year of 7.9 TCO<sub>2</sub> and 9.3 TCO<sub>2</sub> per million euros, respectively. In the total corporate book in 2025, the (direct) emissions financed by Bankinter in Spain and Portugal according to this PCAF methodology is 1.5 million tCO<sub>2</sub> with an investment of 34,869 million euros.

According to the description of the methodology and considering the audited nature of this report, the quality of the information on emissions financed can be rated at 3.5, on a scale of 1 (best) to 5 (worst) and following the classification criteria in the standard established by PCAF (PCAF score). In this regard, it should be noted that level 1 is only achieved when emissions correspond to values declared by companies and verified. This score refers to the entire corporate book.

Calculating the emissions financed is essential for implementation of the Group's decarbonisation strategy. Bankinter has established specific objectives for reducing average emission intensities, incorporated into its Risk Appetite Framework, as detailed below, with monthly monitoring.

The comparison below shows the distribution of loans to companies by Bankinter Spain and the sector, direct emissions and the carbon footprint. This shows that the most polluting sectors have a lower weight in Bankinter's book.

Sector	Credit distribution		Direct emissions <sup>1</sup>	Carbon footprint <sup>2</sup>
	Bankinter	System		
Agriculture	2.0%	4.2%	152%	107%
Extractive	0.2%	0.3%	56%	51%
Transportation and storage	4.5%	7.0%	72%	66%
Chemistry	1.7%	1.3%	72%	45%
Foodstuffs	3.9%	4.8%	20%	46%
Oil	0.2%	0.5%	488%	172%
Metallurgy and machinery	4.1%	4.1%	27%	29%
Other manufacturing Ind.	2.9%	2.7%	18%	22%
Construction materials	0.8%	0.7%	392%	190%
Energy and water	5.3%	5.4%	104%	79%
Real estate activities	22.6%	15.1%	1%	4%
Ad hoc buildings and works	2.7%	2.2%	6%	19%
Building inst. and finishing	1.5%	1.5%	6%	19%
Public works	0.9%	1.1%	6%	19%
Preparation for works	0.3%	0.3%	6%	19%
Transportation materials and equipment manufacture	0.7%	1.4%	4%	18%
Sales and spare parts	16.7%	16.5%	5%	10%
Hospitality	5.0%	6.0%	4%	12%
Other services	24.1%	25.0%	2%	6%
<b>Bankinter</b>			<b>21.9%</b>	<b>21.4%</b>
<b>System</b>			<b>27.8%</b>	<b>25.9%</b>

1 Relative to the gross added value of the sector (kt/€mn)

2 Relative to net final demand for attributed imports (kt/€mn)

As can be seen, even excluding financial activities, Bankinter's exposure to the most polluting activities or those that incorporate a higher intensity of emissions in their final products is very moderate.

This better starting point for Bankinter's loan book in the face of climate change risks is explained by a number of factors:

- Lower weight of higher emitting sectors, such as agriculture or refineries.

- Investment in energy production sectors has already been "decarbonised", due to the significant weight of renewable energies.

These metrics are monitored by the Bank's board of directors.

#### ▪ Climate rating of companies

In October 2021, Bankinter implemented a rating tool for climate change risk for all companies as part of the process for processing credit applications. This climate rating measures the customer's propensity to be affected by physical and transition risks. This considers variables related to the company's activity, the geographical location of its headquarters and factories; and its turnover and credit quality measured through internal ratings.

Below is the distribution of the loan book with financial and non-financial companies as of 31 December 2025 resident in Spain and Portugal, on a 5-level scale according to sensitivity to climate factors.

As can be observed, 84% of the exposure (drawn risk plus undrawn committed amounts) is concentrated in the two best rating levels and only 2.2% is in the highest risk rating, characterised by the most polluting activities.

As with the emissions financed, this information is reported to the Bank's directors as part of the risk information every month.

Risk group	Committed Amount (m euros)				Physical risks*				Transition risks	
	BK Spain		BK Portugal		Temp eratur	Wind	Water	Land	Carbon leakage	Potentially sustainable*
Very low	25,304	55%	2,343	52%	2.0%	2.0%	3.0%	2.0%	1.0%	39.0%
Low	13,598	29%	1,230	28%	35.0%	23.0%	35.0%	35.0%	3.0%	68.0%
Medium	3,241	7%	363	8%	22.0%	18.0%	23.0%	23.0%	9.0%	52.0%
High	3,105	7%	417	9%	44.0%	34.0%	46.0%	39.0%	19.0%	52.0%
Very high	971	2%	121	3%	19.0%	10.0%	19.0%	17.0%	82.0%	53.0%
Total	46,219	100%	4,474	100%	16.0%	12.0%	17.0%	16.0%	5.0%	49.0%

\*According to EU Taxonomy, according to the latest update adopted in Jun-21

#### ▪ Physical risks

Bankinter has developed a process to improve the measurement of the main physical risks that may affect its risk books. Firstly, in the case of individuals, because they may pose a risk to mortgaged properties, and secondly, in the risk book of legal entities, because they may affect the physical assets of the various companies or compromise the normal development of their activity.

This is a structural approach that is divided into three distinct parts:

- Current exposure to different physical risks is determined, mainly river and sea flooding, desertification, forest fires, drought and heat waves, according to the precise location of the buildings or the development of productive activities, using databases that provide precise information, which is essential to evaluate certain risks such as flooding.
- An adjustment factor is calculated based on the term and scenario considered, using the forward-looking information published in Copernicus. While this information has low granularity, it does provide a very useful benchmark for establishing trends.
- Lastly, a vulnerability factor is determined for each risk considered, according to the type of building or the activity carried out (through CNAE/NACE codes), exploring in the latter case the different impact transmission channels that exist, which are not limited to damage to physical assets.

Throughout 2025, indicators for these physical risks have been incorporated into the risk approval process, both for mortgage transactions and for Corporate & SME Banking operations. These physical risk indicators are submitted, together with the rest, to the risks committee for transaction analysis.

Below is a summary of the channels considered to determine the different vulnerabilities to the different physical risks.

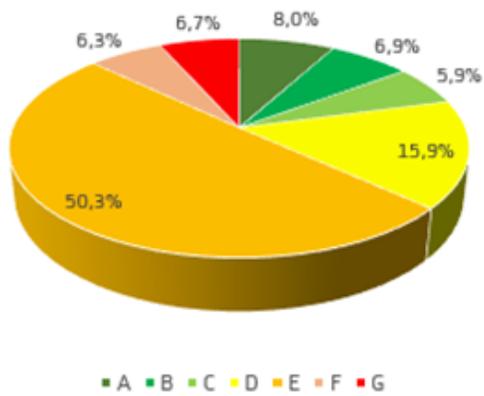
		Impacts					
		Impact on physical assets (due to direct damage or loss of value)	Limitations on access for workers	Lower productivity	Supply problems	Higher costs	Lower sales
Physical risks	Flooding	Infrastructure Buildings Crops Machinery Stock	Yes		Damage to the electricity distribution grid Impact on transport	More expensive insurance	Customer limitations Impact on transport Reduced tourism
	Heat waves	Crops Livestock Forests	No	Activities carried out outdoors or without sufficient cooling capacity Reductions in fishing catches Crops Livestock Forests Restriction of activities due to fire risk	Saturation of the power supply network	Higher cooling/dehumidification costs for plant and transport More expensive insurance	Reduced tourism Customer limitations
	Drought	Crops Livestock Forests	No	Crops Livestock Forests	Water-intensive sectors Limitations on hydroelectric production	More expensive insurance	Reduced tourism
	Forest fires	Infrastructure Buildings Crops Livestock Forests Machinery Stock	Crop, livestock and forestry areas	No	Damage to the electricity distribution grid Impact on transport	More expensive insurance	Reduced tourism Impact on transport

## Mortgage book

- Transition risks

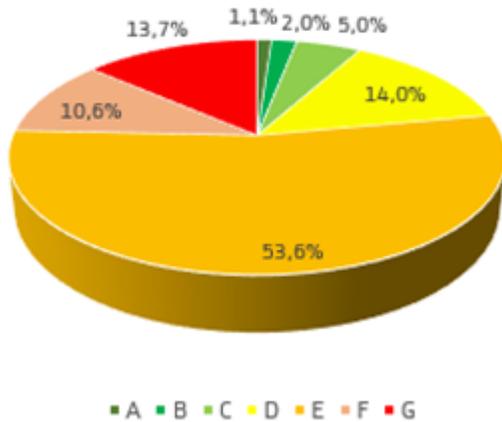
Currently, information is available on the energy efficiency of the properties in guarantee, real or estimated, of the mortgage books in all the geographical areas in which Bankinter Group operates. Below are the distributions by energy efficiency ratings, with the letter "A" being the best rating and the letter "G" being the worst.

**EPC emissions in Bankinter Spain mortgage portfolio**



As can be seen, there is a huge concentration in level E in Spain, corresponding to the general efficiency situation in Spain, as shown in the following chart:

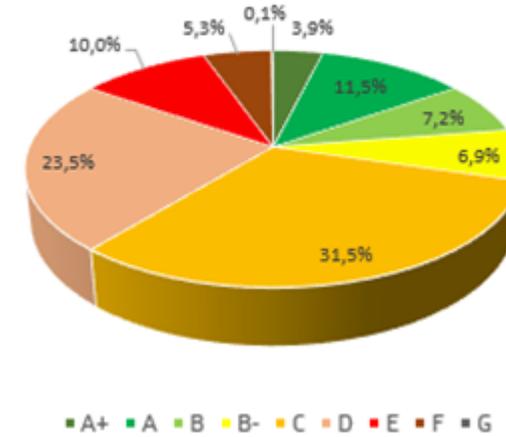
**EPC emissions in Spain\***



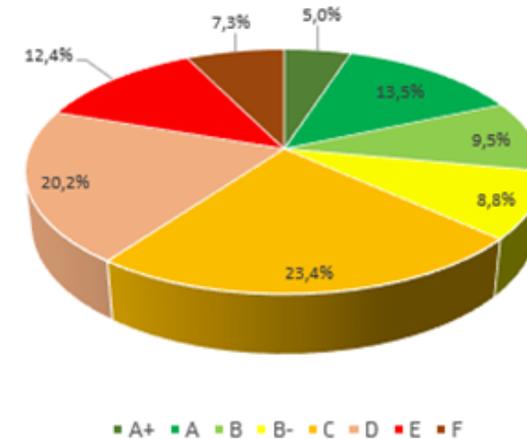
\* Source: Report on the status of energy certification of buildings. Ministry of Transport, Mobility and the Public Urban Agenda. December 2022

Below you can see the distribution of Energy Efficiency Certificates in Portugal:

**EPC emissions in Bankinter Portugal mortgage portfolio**



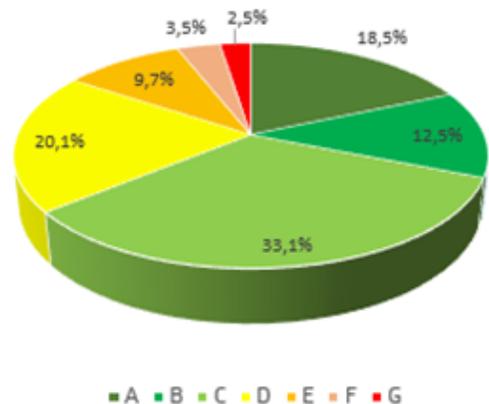
**EPC emissions in Portugal\***



\*Source: Statistics of the Building Energy Certification System. ADENE - Agency for Energy. Data in Q4 2025.

Finally, the distribution of Energy Efficiency Certificates of the Bankinter book in Ireland:

**EPC consumption Bankinter Ireland mortgage portfolio**

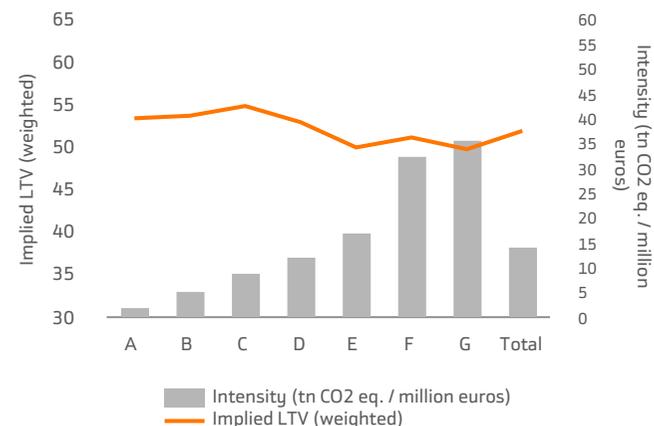


There is considerable room for improvement in the efficiency of buildings. Bankinter's business objectives, therefore, include promoting building refurbishment projects, making financing available to property owners' associations, which is the approach needed for such projects to be performed. If we compare both distributions, we can see in Bankinter's book a greater weighting of the best ratings to the detriment of the two worst ratings, F and G.

The ratings are used to determine the emissions financed by Bankinter, taking into account the property's emissions included in the certificate itself or, in the case of estimates, those representative of the assigned letter, the type of property, its location and the climate zone. The following chart shows the intensities of emissions financed (in terms of tonnes of CO<sub>2</sub> equivalent per year per million euros financed) and the implicit LTVs, which are determined as a ratio of the emissions attributed to Bankinter through its financing and the totals generated by the property:

It can be observed that the average LTVs start to be higher from the D rating to the A rating, which is related to the fact that the new mortgage production presents a greater energy efficiency. This situation also contributes to better coverage of transition risks.

**Emissions intensity and LTV**

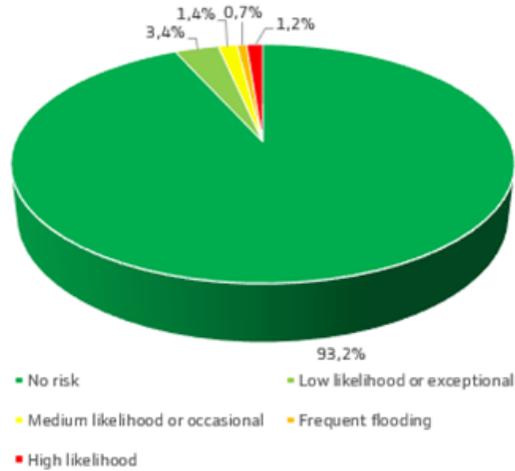


The decarbonisation pathway for Bankinter Group's mortgage book is included in section 2.2.3.2 Business Strategy – Transition Plan. This pathway was incorporated into the RAF in 2025.

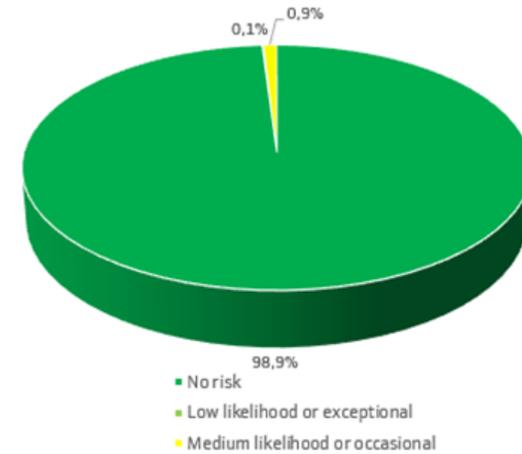
▪ **Physical risks**

The information from the Energy Efficiency Certificates (CEE) for the mortgaged properties, is supplemented by various physical risk indicators depending on the geographic location of the collateral, such as the risks of flooding by rivers or seawater, and desertification. In this regard, considering the geographical areas where Bankinter concentrates its activity, the risks of flooding are very low, as can be seen in the following graphs in which the exposure is distributed by risk levels:

Rivers flooding risks



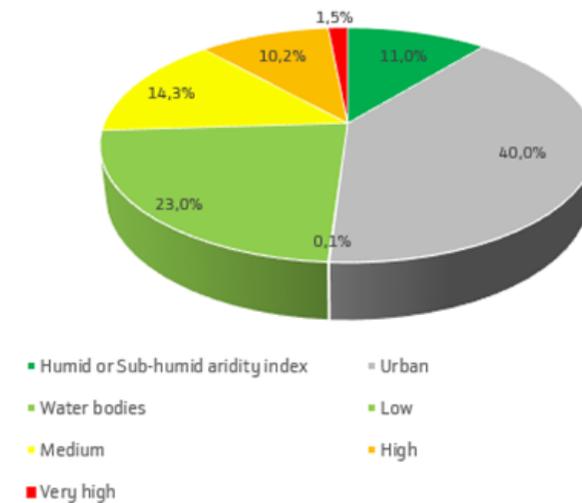
Maritime flooding risks



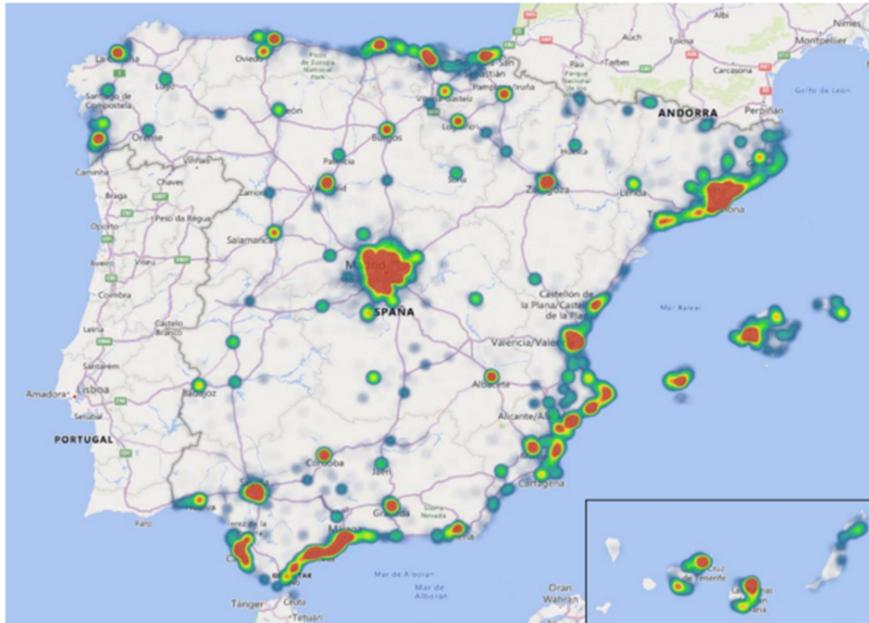
On 29 October 2024 year, we witnessed natural disaster that occurred in the form of a DANA (an isolated depression at high levels of the atmosphere) resulting in heavy rainfall and severe flooding, with particularly catastrophic consequences in the province of Valencia. This raises even more alarm about the potential capacity of climate change to cause radical and irreversible damage and not necessarily in the very long term. However, once such events occur, it also tests the ability to respond and absorb losses. It is worth noting in this regard that Spain has instruments to pool the damages associated with natural disasters, taking into account their high uncertainty and the severity of their effects. Additionally, the health crisis forced the development of a variety of financial tools (payment holidays and government-backed liquidity facilities), which were immediately deployed following the publication of Royal Decree-Law 6/2024 of 5 November. The overriding priority of Bankinter, S.A. was to use all the means at its disposal to help restore normality in the affected areas by contacting customers and offering the aid mechanisms provided for in the Royal Decree. Ultimately, however, the amount of the aid granted under this Royal Decree was very limited (50.2 million euros at the end of 2025 in ICO lines, to which 10.6 million euros in moratoriums were added), and therefore the potential economic impact (in terms of loan book impairment) is estimated to be very moderate.

As for the risk of desertification, this is higher due to Spain's geographical location, as reported in the original source (Soil and desertification mapping published by the Ministry for Ecological Transition and the Demographic Challenge).

Desertification risks (original)



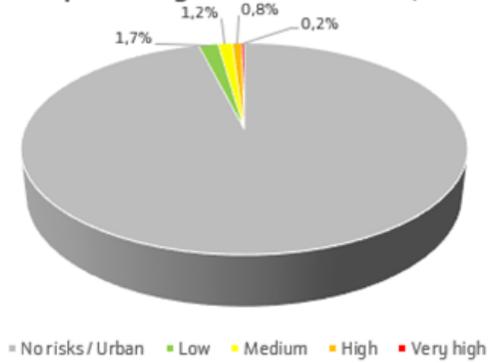
If very high, high and medium risks are added, they represent 26% of the reported book. Note, however, that urban centres are outside this classification. The following map shows the geographical distribution of the drawn balance of these exposures:



As can be seen, there is a high concentration in the metropolitan areas of Madrid and Barcelona. Some distance behind would be Malaga and the Costa del Sol, Levante, Seville, Cadiz and Palma de Mallorca. This is a mainly urban book, which influences the assessment of physical risks.

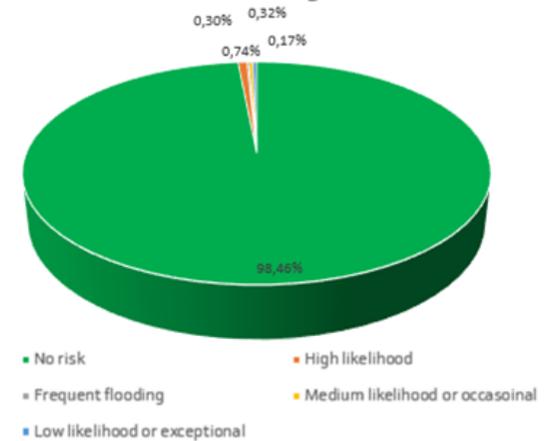
In general, environmental degradation in the area in which a property is located will have a significant impact on its value, unless there are other factors such as its proximity to an established urban centre that concentrates employment opportunities, services, etc. For this reason, a refinement criterion is applied whereby metropolitan areas or areas close to municipalities with a minimum population are also classified as urban. Under these conditions, the risk distribution is represented in the following graph:

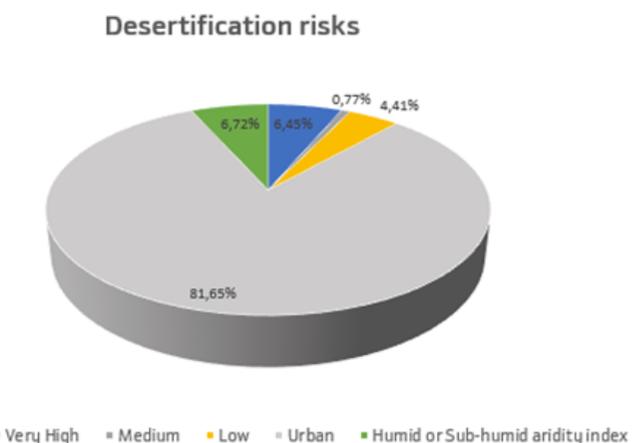
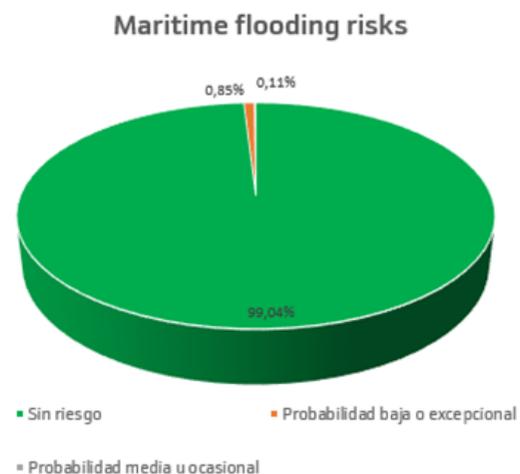
Desertification risks (adjusted for proximity to urban centers)



Finally, information is provided on flood and desertification risks in Portugal:

Rivers flooding risks





Even these filtered desertification risks are concentrated in coastal tourist areas, where it is not obvious what impact this risk may have specifically on the value of the building.

#### • Emissions financed

With regard to Bankinter Group's mortgage book, the calculation of emissions is carried out using Energy Efficiency Certificates. Although it is currently required in all property purchase and sale transactions (except those that are exempt from certification due to their type), the truth is that, in order to extend this calculation to the entire book, it is necessary to resort to an estimate of the emissions rating of many properties. It is worth noting that the Bank has contracted a service that allows it to track existing certificates in all public registries of the

Autonomous Communities. Estimates are, therefore, only used when the property's actual certificate cannot be traced.

If there is a certificate, the property's emissions are used. If, however, it is necessary to estimate the energy rating, the emissions corresponding to that rating are used, taking into account its location, climate zone, and property type.

In the case of mortgages to individuals, out of a book of 32,451 million euros (with actual or estimated energy efficiency certification), 462 thousand tonnes of CO<sub>2</sub> equivalent are financed (473 thousand tonnes of CO<sub>2</sub> equivalent in 2024), implying an average intensity of 14.2 tonnes per year per million euros of drawn balance (15 in 2024). In this calculation, of the total drawn amount associated with all properties considered, 64.9% (54.7% in 2024) has observed emissions reported in the energy efficiency certificates. According to this percentage and taking into account that the estimated emissions are obtained considering the surface areas of the properties, its PCAF score in relation to the quality of the reported information is 3.4 on a scale from 1 (best) to 5 (worst). However, it should be noted that when energy certification is available, the emissions reflected in the certificate itself are adopted, so an estimate based on the label is not used, as can be interpreted from the PCAF evaluation methodology for score 3, which is what is applied to properties with actual certification.

### 13.3.5. Assessment

Assessing climate and environmental risks poses a real challenge to financial institutions for several reasons.

Firstly, this is because of the characteristics of the potential impact of physical factors, especially those of a chronic nature the effects of which manifest themselves gradually over the very long term. It is therefore not only a matter of assessing the Bank's capacity to withstand a temporary shock, but also of being able to adapt to a new reality in the event that international commitments to reduce emissions are not met.

All analysis must be supported by verified information. But while it is often taken for granted that the available data is both sufficient and reliable, the truth is that reliable information is still scarce and estimates have to be used about which there may be significant uncertainty.

Last but not least, the novel nature of climate risk assessment exercises must be taken into account. This not only requires developing certain capabilities internally, but also requires consolidating commonly accepted methodological approaches that can therefore serve as a reference.

Despite these difficulties, it is necessary to make progress in assessing risks related to climate and the environment. The Group has decided to adopt an eclectic approach, developing the three lines of work set out by the EBA in the "EBA Report on management and supervision of ESG risks for credit institutions and investment firms" in parallel:

- Book alignment: progress against targets
- Sensitivity analysis: impact of potential events and materialisation of adverse scenarios
- Exposure method: assessment of individual exposures to climate risks. We explain each of these three lines of work in more detail below

We explain each of these three lines of work in more detail below

### Book alignment

As mentioned in the previous section, Bankinter estimates its emissions financed for those more significant exposures, including the entire corporate book of Bankinter Spain and Bankinter Portugal, and the mortgage book with individuals of Bankinter Spain, Bankinter Ireland, and Bankinter Portugal. Only the Bank's investment in individuals without mortgage guarantees is excluded from this perimeter, which, in the case of Bankinter, is mostly composed of transactions with pledge collateral, personal guarantee loans or credit cards without a specific purpose. For example, automobile financing is not very significant within the Group (and is not required under the PCAF methodology).

This is not only important for setting and monitoring decarbonisation targets, as will be described in the next section, but also allows characterising the concentrations of direct and indirect emissions by activity branches, a core aspect for sensitivity analysis.

Although this involves identifying emissions at the counterparty level for the various direct scopes, through energy consumption and indirect scopes, the problem is how these overlap. This means we also need to apply the "carbon footprint" concept. This refers to the concentration of emissions in the final products of an industry and which come from both the emissions necessary for its production and from the intermediate products and services that form part of the added value of the product.

A very relevant aspect, which requires adaptation, is the lack of individualised data on direct emissions, a limitation that is even more pronounced in the case of indirect emissions.

Bankinter has a diversified book with exposures in a large number of small and medium-sized companies that, for the time being, are not required to disclose this type of information. For this reason, adaptation consists of having the capacity to obtain individual estimates from official statistics on emissions into the atmosphere by activity sectors. Furthermore, this estimation exercise also serves as a contrast when information provided by the companies themselves is available.

Furthermore, it must be taken into account that financial institutions, as credit facilitators, can contribute to the transformation towards a sustainable economy, but they do not have the capacity to lead the change. This means that the Group's decarbonisation objectives cannot be separated from the fulfilment of the general objectives set at both national and European level. The monitoring of the Group's portfolio must, therefore, be framed within the general path of emission reductions.

### Sensitivity analysis

This analysis, which includes stress tests, is essential for incorporating climate risks into recurring self-assessments of capital requirements and, therefore, of the institution's solvency.

The European Central Bank is committed to promoting this type of analysis. Therefore, it organised a climate stress test exercise for the first half of 2022, the results of which were published in July. This is a first exercise developed on the basis of limited information and unconsolidated methodological support. However, this has promoted the development of internal approaches to the assessment of climate risks.

For many participating entities, this exercise only involved providing information by branch of activity on margins, the emissions of the largest customers and energy efficiency certificates for the properties held as collateral. In addition to this exercise, Bankinter is developing its own sensitivity analyses/stress tests based on the following criteria:

- Alignment with the scenarios and projections offered by the Network for Greening the Financial System (NGFS). This collaborative group, made up of central banks, supervisors and other observers, is building a framework for climate risk analysis that defines a small number of relevant scenarios, each characterised by long-term projections of multiple variables of interest and further scaled down to country level. This provides the entities with, at the very least, a common language and a methodological framework of reference, thus promoting consistency between the evaluations carried out by the different entities. The progress made in recent publications is also noteworthy, particularly the so-called phase IV of November 2024. In this last phase, as already explained in the section on materiality analysis, the impacts on the growth of activity of certain acute physical risks are reduced at the country level, and these gain enormous prominence. Indeed, last year it was already commented that the overall effect on growth could not be ignored, also considering their mutualisation.
- Sectoral asymmetry of effects. The transmission of shocks (such as the one associated with the "Delayed transition" scenario in the NGFS projections) to exposures must consider the asymmetry of effects on different branches of activity considering the carbon footprints of the final products, which involves an upwards spread of emissions through value chains. However, the downward propagation of the effects must also be considered, so that the difficulties of a sector are also transferred to its suppliers, even if they do not incorporate emissions into the final product. In other words, we cannot assume that the effects of such shocks will not spread, to a greater or lesser extent, to all productive sectors, in an economy where activities are so interrelated. This is something we can currently see as a consequence of the war in Ukraine and its effects on energy and raw material prices. Indeed, a short-sighted view of the problem can lead to an underestimation of its effects.
- Managing very long-term effects today. The scenarios involving a lack of action to reduce emissions are characterised by incremental and irreversible impacts on economic growth derived from the effects of rising temperatures. These will become significant over the very long term. It should also be noted that financial institutions have been adapting their exposures to a changing reality. Let us think, for example, of the

transformations that have occurred in recent decades in relation to technology, offshoring or distribution models. Entities are adapting to the developing nature of demand for viable credit, resulting in loan books rotating to assimilate these changes. It is therefore difficult to determine, for example, what additional capital needs imply potential impacts that will materialise over the next 50 years.

However, the peculiarity of not acting against the chronic and irreversible effects of rising temperatures is that this will probably lead to a context of lower growth and greater volatility resulting from greater exposure to acute physical risks.

Under these conditions, it is possible to foresee greater exposure to financial risks, which would require higher capital needs if the scenario materialises.

### **Exposure method**

The exposure method consists of understanding the risks to which customers are exposed and how they are mitigating them or plan to do so. This is an essential approach to developing an inclusive decarbonisation strategy, as will be explained in the next point.

The Group thus relies on all the identification and measurement tools described in section 13.3.4 of this chapter. Specifically, the climate rating applied in the corporate sector serves as a classification tool with the primary objective of providing a warning about potential climate risks for certain customers and, in this way, facilitating a more targeted dialogue with them:

- Firstly, to understand their real exposure according to the activities they carry out.
- Secondly, to encourage transformation projects, facilitating the necessary financial assistance.

In other words, this method is essential not only to better understand climate risks and incorporate them into decision-making, but also as an instrument for the development of sustainable financing.

In February 2025, Bankinter's board of directors approved a proposal to introduce an adjustment to the models used to estimate credit impairment allowances in order to cover climate and environmental risk factors, including businesses in Spain, Portugal and Ireland. This adjustment amounted to 6.4 million euros at the end of 2025.

### **13.3.6. Action**

#### **Inclusion of climate change risk in the credit risk approval process.**

In order to include the risk of climate change in the risk sanctioning process, Bankinter has taken three important steps:

- a) Include information related to climate change risk in risk proposals:

#### Corporate & SME customers

- Emissions information for each customer. In the event that they are published, the published emissions are incorporated. If the customer does not publish their emissions, which is the case for the majority of Bankinter's book of small and medium-sized enterprises, the information on estimated emissions is incorporated using the PCAF methodology.
- Information on the climate rating of each customer, with the aim of focusing the dialogue with them, especially on the highest risks and, this way, incorporating factors related to climate and the environment in decision-making. It was decided to start this process with customers whose transition risk indicator is high or very high.
- Mandatory questionnaire. This group represents approximately 9.1% of the book. In such cases, the relationship manager starts a conversation with the customer with these objectives:
  - To find out their opinion on how climate change may be affecting their activity, both as a result of physical risks and transition risks.
  - To find out about their plans to reduce this effect by diversifying their activity or reducing their greenhouse gas emissions. It will be considered important that the company has established a decarbonisation plan for its activity and that it complies with it.
  - To find out about the investments planned for this purpose and the possibility that Bankinter may collaborate, if appropriate, by providing financing for these investments.

The information obtained in this conversation must be included in the risk proposal under study and discussed in the corresponding risk committee.

To help in this process, the climate rating is automatically included in the minutes of committee meetings. Fields have also been included in proposals for the customer's rating with space to include the information from this customer dialogue.

- Information on physical risks. For each customer, an assessment is automatically provided of how physical risks arising from climate change may affect their solvency or business activity. This assessment is included in risk proposals and analyses and submitted to the risks committee for consideration.

#### Customers with mortgage-backed transactions

The proposal and approval process includes information on the Energy Efficiency Certificate of the properties that act as collateral for loans, which is recorded in the risk proposal and in the Bank's information systems, such as climate zone, emissions or consumption.

b) In addition, a physical risk indicator has been incorporated into the transactions and approval process, indicating how these risks arising from climate change may affect the properties provided as collateral for these transactions and their valuation. This indicator is

submitted together with the rest of the information to the risks committee for consideration.

This information, in addition to supporting risk approval decisions, should assist the bank's branch network in its commercial activity by generating sustainable business, by identifying which customers have the greatest need to invest in decarbonisation projects and therefore may require financing.

Once this information has been collected for each transaction, the risk committee must approve the proposal, considering whether the climate risk should influence it in its different aspects of price, term, amount and guarantees. During approval, the Bank considers:

- The individuals who approve credit risks are the same ones who approve this climate risk, as climate risk is understood to be a factor that affects traditional credit, operational, reputational, liquidity, and market risks in a transversal manner. In order to incorporate these analyses into the approval of transactions, the Bank has the relevant policy documents. Furthermore, analysts receive sufficient training to understand and approve these transactions.
- Bankinter wants to implement an inclusive strategy related to climate risks, collaborating with companies and individuals by financing their transition towards activities that emit less greenhouse gases.

c) For the Corporate & SME Banking book, there is an indicator within the Risk Appetite Framework that limits investment in climate risk considered High and Very High to 12% of the Corporate & SME Banking book in Spain and Portugal.

For the mortgage book, there are restrictions for the worst Energy Efficiency Certificates:

- Firstly, limiting manual approval to transactions with energy efficiency certificates F or G and with tighter effort ratios.
- Furthermore, those transactions with F or G category certificates that are approved manually will have to take into account a possible increase in the effort required to invest in improving this certificate.

## Business strategy

Bankinter is in the final phase of developing a business strategy consistent with these commitments. This is based on four pillars:

1. Sustainability policy
2. Scenario analysis – prospective approach
3. Decarbonisation strategy
4. Business with ESG criteria

In this section we look at the progress with these pillars of our strategy.

## Sustainability policy

See information in chapter 13.3.1 Business strategy and processes and 13.3.2 Governance.

## Scenario analysis

The incorporation of climate factors into the business strategy requires development of capacities to assess their effects in the long and very long term.

This entails a great deal of uncertainty that cannot even be determined, not only due to the lack of empirical evidence but also because action against climate change requires global agreements that are not easy to achieve. The appropriate tool in this context is therefore scenario analysis, as pointed out by the European Banking Authority in its "EBA Report on management and supervision of ESG risk for credit institutions and investment firms". The business strategy must be developed using a baseline scenario – currently Net Zero 2050 as per the NGFS definition and projections – as a benchmark. This also involves evaluating the strength of the bank and its strategy under the hypothesis that plausible alternative scenarios become reality, especially those where action in response to climate challenge is delayed (disorderly in the NGFS terminology).

Furthermore, Bankinter works with the SSP1-1.9 and SSP4-6.0 scenarios (pathways used by the IPCC) in estimating the physical risks that may affect its corporate or mortgage risk books.

## Decarbonisation strategy

Bankinter recognises that the financial sector must assume its role as facilitator of the transformation towards a sustainable economic model, which allows mitigating or adapting to the effects of climate change and preserving the environment. Bankinter is firmly committed in this direction, as demonstrated by its membership of the Spanish Global Compact Network and its adherence to the UNEP FI and the Net Zero Banking Alliance. It is worth noting that being part of this alliance means committing to neutralise emissions corresponding to its financial and investment activity before 2050, in line with the objectives of the Paris Agreement on climate change. The Bank has a decarbonisation strategy for its corporate and mortgage book, which is the most relevant part of its financed emissions, until 2030 and will be reviewed periodically. In the case of residual GHG emissions around 2050, carbon credits would be used as has been done in recent years to offset the direct footprint (see section 2.6.1 emissions offsetting).

As mentioned above, to deliver on this commitment, in February 2022 the Group drew up its own decarbonisation strategy, approved by the Group's administrative body through the sustainability and appointments committee. This involved establishing specific quantitative targets for the intensity of emissions financed to 2030, in line with the emission reduction plans laid down in Spain's Integrated National Energy and Climate Plan (PNIEC) and its counterparts in Portugal and Ireland. These emission reduction plans, in turn, represent the national implementation of the commitments made in the Paris Agreement and, therefore, include details of the decarbonisation pathways for the main sectors, including both activities and households, which are used as a reference for aligning the Group.

The decarbonisation metric for the Corporate & SME Banking book, which includes the main greenhouse gas emission-intensive activities in Bankinter's loan book, was authorised by Bankinter's board of directors in 2022 and has been monitored monthly since then and incorporated as an indicator in the Risk Appetite Framework.

For a growing bank such as Bankinter, these objectives have been defined in relative terms and for this reason the Bank's Decarbonisation Plan refers to intensities (economic intensity of emissions = emissions measured in tonnes of CO<sub>2</sub>/million euros of investment)

Given that, in the case of Bankinter, this Corporate & SME customers book is largely composed of medium or small-sized companies, it is considered that this economic intensity metric has advantages over others:

- It allows the intensity of all sectors to be compared by using a homogeneous metric.
- It allows for an estimate of the emissions financed based on sectoral data from the INE, compared to the difficulty of using an activity metric on which we would find more difficulties for its estimation.
- It allows global conclusions to be drawn from the entire book, its evolution and alignment with objectives.

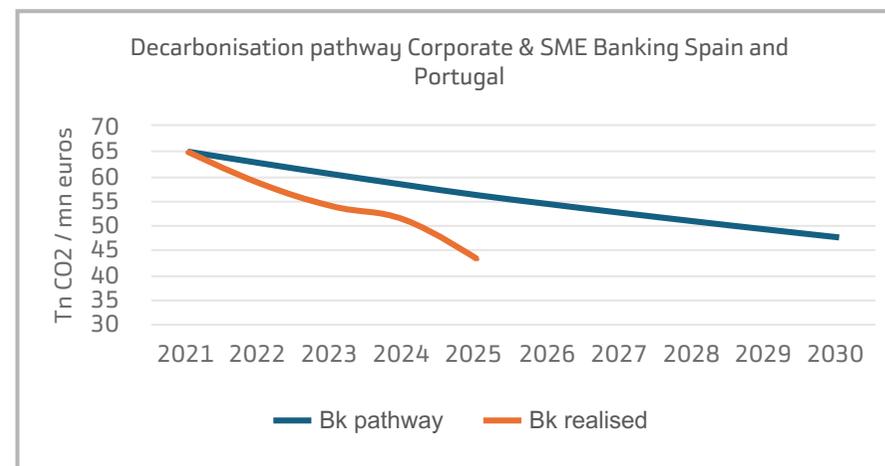
In 2024, experience and confidence were gained in the decarbonisation metric for emissions from mortgaged properties, using the same economic intensity ratio based on property emissions obtained through the Energy Efficiency Certificate. In November 2024, the executive committee authorised the incorporation of a new metric in the Risk Appetite Framework based on these intensities and their reduction throughout 2025.

#### Decarbonisation targets for legal entities (Tn CO<sub>2</sub> eq/mn euros)

Despite Bankinter having a better starting point than the system as a whole, as it has less investment in the sectors with the highest emissions, the target pathway is similar to the pathway in the PNIEC.

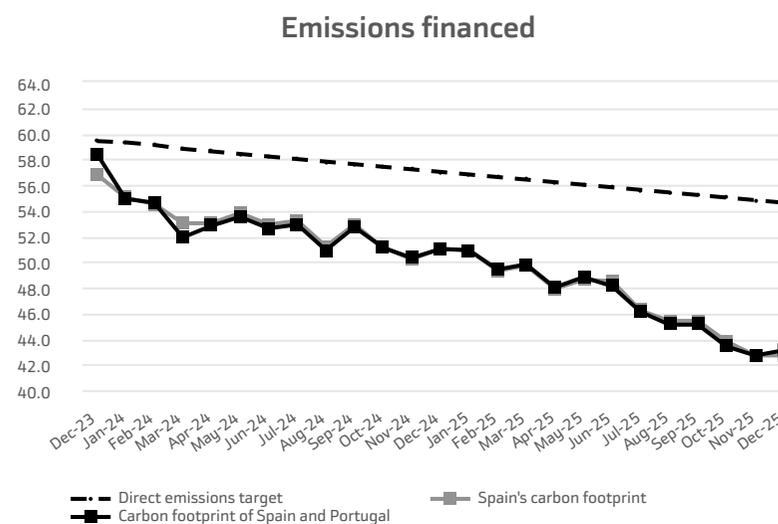
Accordingly, the target for 2025 was to achieve a 13.5% reduction in emissions intensity (which has been achieved), with a further 15.8% reduction between that year and 2030, compared to 2021 data, which stood at 64.3 tonnes of CO<sub>2</sub> per million euros of investment. This slower initial pace is justified by the fact that efforts in the first years of the national plan are focused on the electricity production sector, which in the case of the Bank is practically decarbonised. Altogether, this represents a total decrease of more than 20%. It should be noted, however, that these goals, although aligned with the official emissions reduction plans of the main countries where the Bank is represented (Spain and Portugal), are not validated by an external body such as SBTi (Science Based Targets initiative).

This pathway is updated as data is obtained from official sources (National Plans, INE data on sectoral emissions) and internal data from Bankinter's corporate book. Considering the latest update with greenhouse gas emissions data for the Spanish economy published by the National Statistics Institute (INE) for 2024, the bank's decarbonisation pathway is as follows:



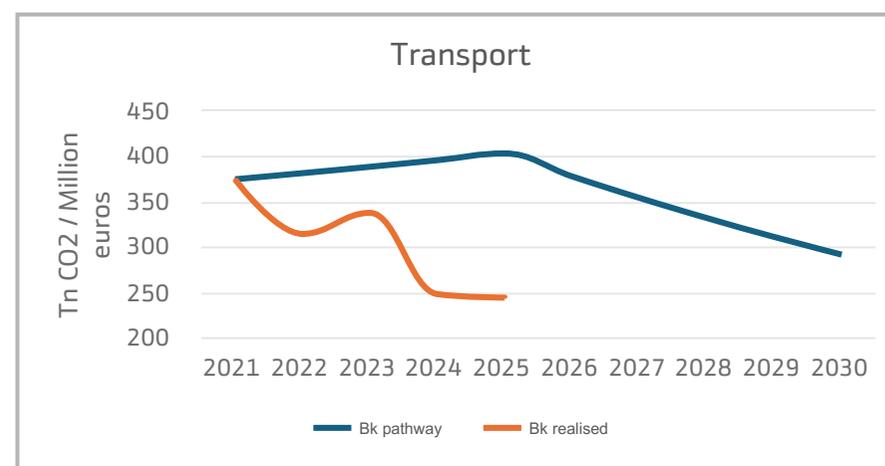
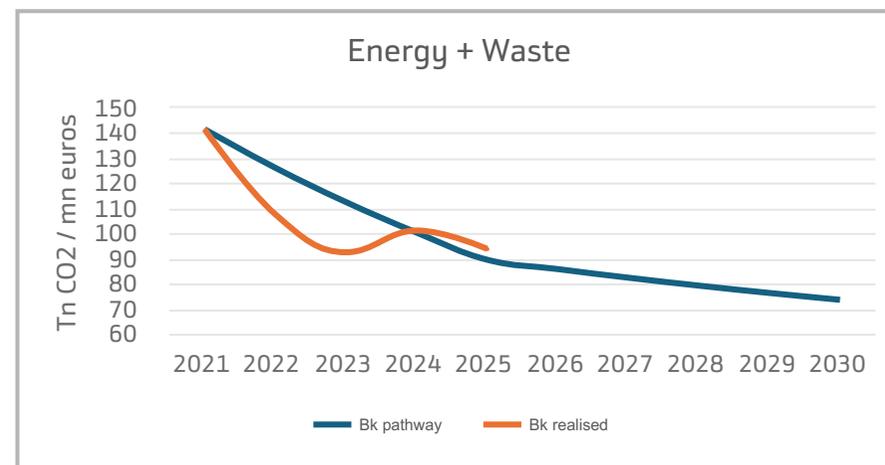
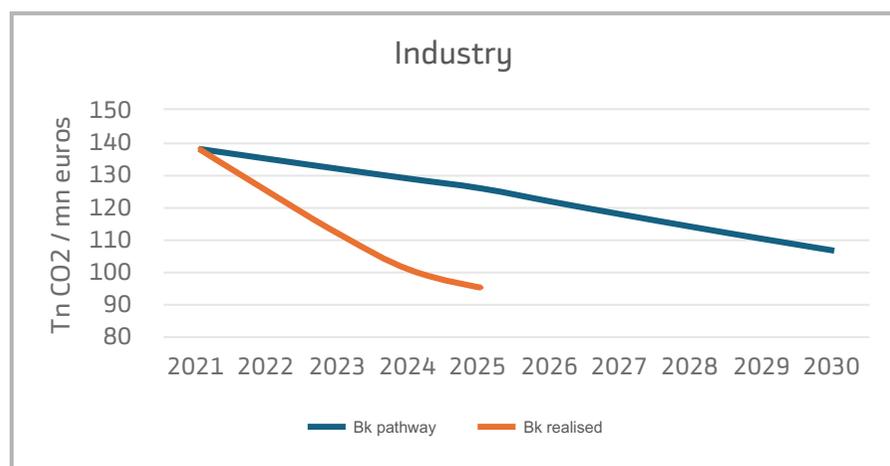
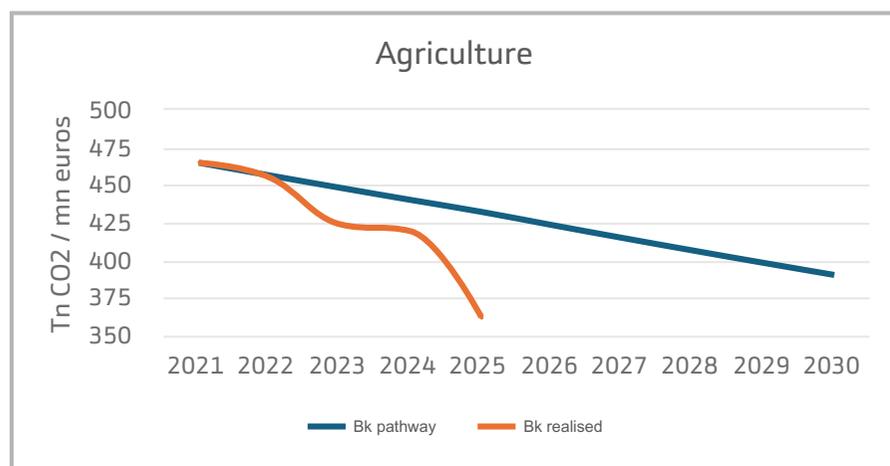
This decarbonisation pathway of the Spain and Portugal corporate books is monitored and included in the Global Risk Report on a monthly basis, comparing the target pathway with the actual updated data, and the results are made available to the members of the administrative body. As can be observed in the chart, the emissions intensity targets per million euros are being met.

The monthly monitoring of this decarbonisation pathway for the corporate books of Spain and Portugal is shown below:



The main objective of this decarbonisation pathway is to reduce the emissions financed by each million euros in the loan book in the entire Bankinter book. However, although this global objective is the metric usually reported both internally and externally, a series of sectoral sub-objectives are monitored, using information on estimated or actual emissions by sector of activity for the Bank's entire Corporate & SME Banking book and, via the national statistics institutes, for all economic activities in both Spain and Portugal.

Specifically, these sectoral groups are the following: agriculture, industry, transportation, energy and others, which would allow us to analyse causes of deviation from the main objective. The paths for the four sectoral groups mentioned are shown below:

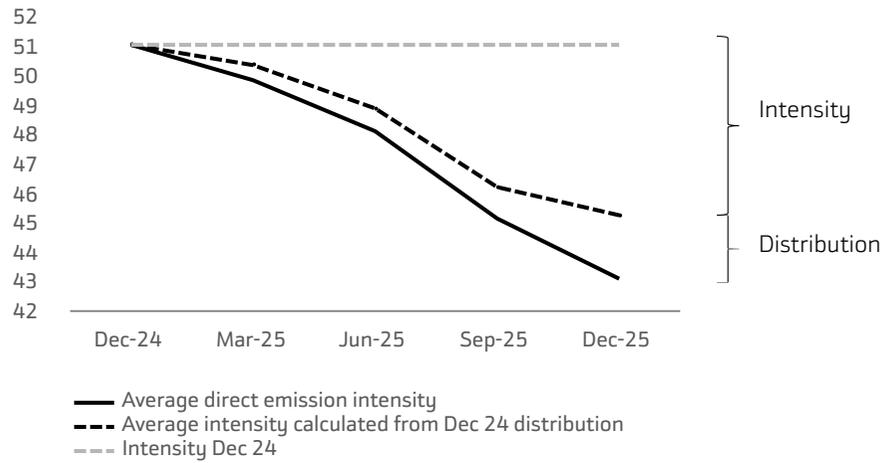


It should be noted that as this is a global objective that refers to the entire corporate book, it can be achieved through two complementary channels:

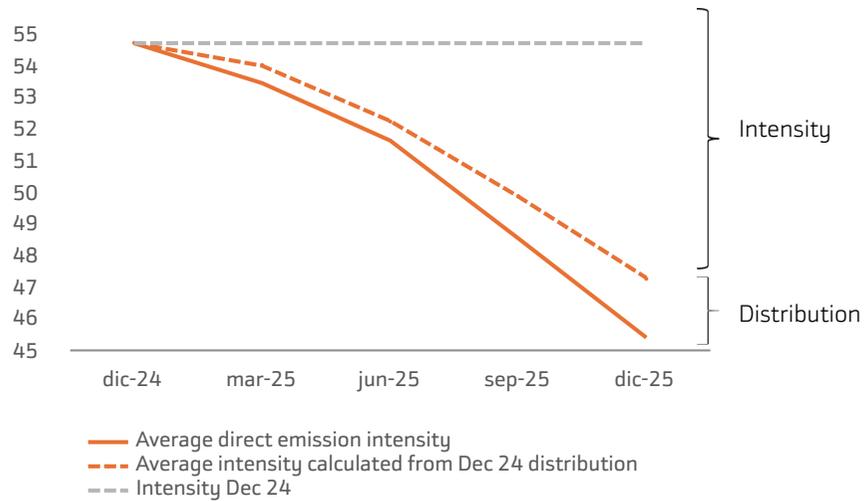
- By the reduction in emissions intensity itself, which may occur as a result of customers' decarbonisation efforts or by a reorientation of the loan book towards less emissions-intensive borrowers.
- For an evolution of the composition of the book towards activities with lower emission generation.

The following graphs show the evolution of the intensity of direct emissions from the loan book, as well as that corresponding to the carbon footprint, distinguishing between both indicated paths, intensity and distribution:

Direct emissions: Evolution between Dec-24 and Dec-25

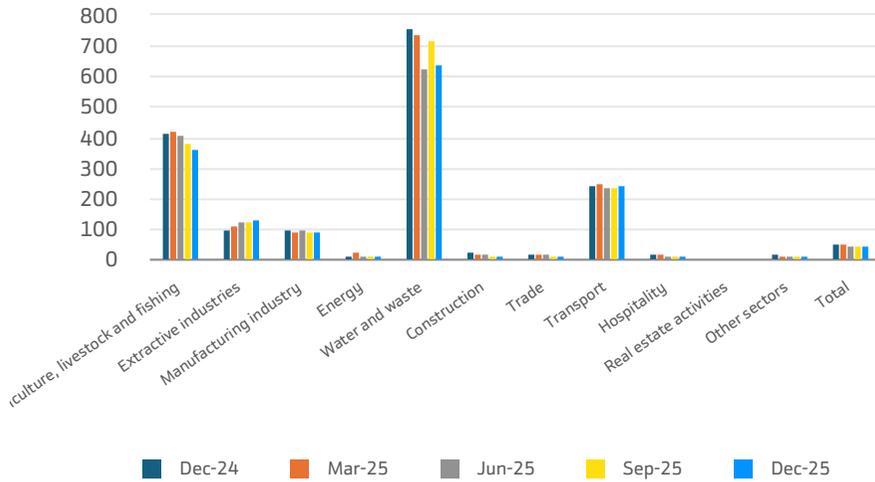


Carbon Footprint: Evolution between Dec-24 and Dec-25

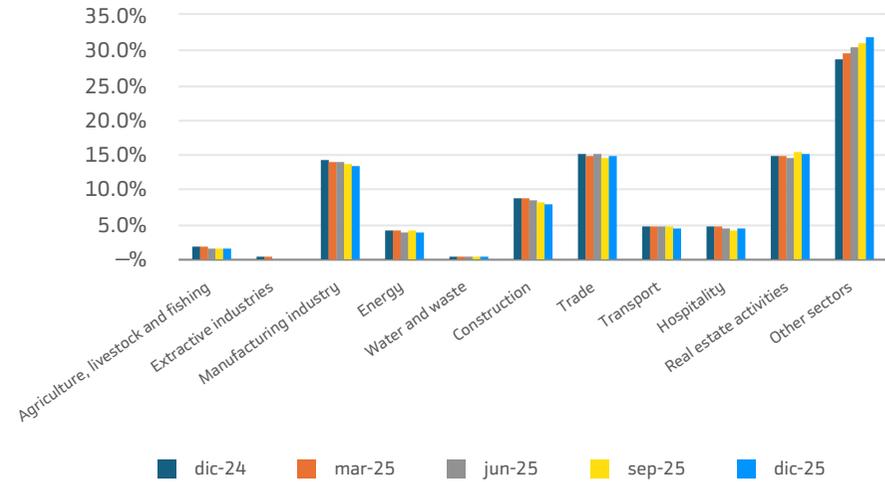


As can be seen, the reduction in overall intensity in 2024 is due to both changes in the specific intensities of the different sectors and movements in the distribution of the book. It is worth noting that the intensities are adjusted as emissions reports from large companies are updated, and in the case of estimates, the update of official atmospheric emission statistics in the second half of the year has an impact. Hence the temporal distribution of the different effects. The following graphs show the evolution of intensities by sector and their weight in the book:

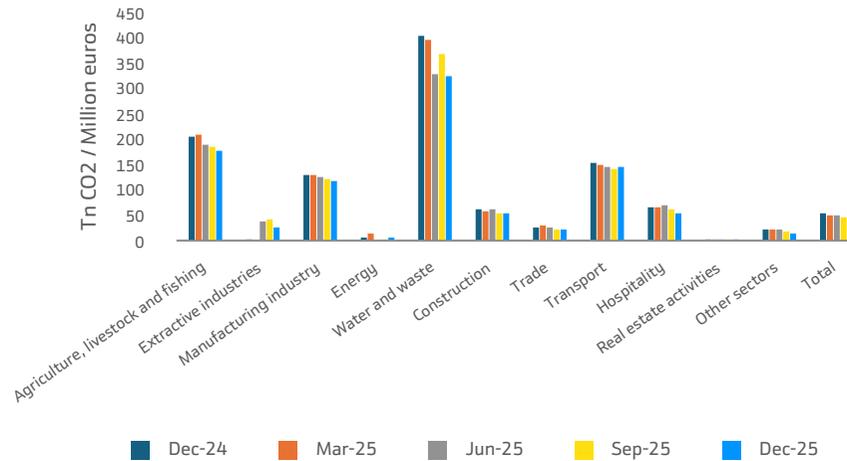
Direct emissions intensities (scope 1) by sector



Distribution of loan book by sector



Carbon footprint intensity by sector



To meet its decarbonisation goals, Bankinter is clearly committed to an inclusive strategy, promoting the reduction of intensities in the face of changes in distribution, providing the necessary support so that customers can transform and adapt to a less emission-producing and environmentally friendly economy.

However, it cannot be ignored that the largest source of greenhouse gases comes from the combustion of fossil fuels, so efforts in the coming years will focus on substantially reducing dependence on them. Against this backdrop, Bankinter is becoming progressively more demanding in terms of compliance with decarbonisation objectives, limiting funding of activities that are incompatible with emissions reduction or customers who are not willing to change.

In this regard, the bank's sectoral financing guidelines incorporate certain limits in relation to transaction admission criteria, particularly in the extractive and energy sectors. Specifically, Bankinter will not finance:

- customers whose activities consist of more than 25% thermal coal mining and who do not have a diversification or decarbonisation strategy. It also undertakes not to have exposure to thermal coal mining from 2025.
- customers that generate a significant amount of electricity from coal (more than 25%) and do not have a diversification/decarbonisation strategy in place. In line with the decarbonisation objectives of the Bank's financing books, Bankinter undertakes the commitment to, from now until 2030, progressively reduce the provision of any type of financing to customers for whom energy generation from coal directly represents more than 10% of its income in consolidated terms.
- customers that have significant activity in the field of unconventional oil and gas extraction (tar sands, hydraulic fracturing and/or exploration and production in the Arctic and/or ultra-deep water (UDW)) that represents more than 10% of their turnover and that do not have a diversification or decarbonisation strategy.

Banks have a responsibility to help finance the transition to a sustainable economy, as facilitators of credit. However, this transformation process also requires other types of incentives and certainties regarding the technology to be targeted that do not depend on the financial sector. Therefore, the Group's decarbonisation will largely depend on compliance with the national objectives set, as recognised in the strategy itself.

#### Decarbonisation objectives mortgage book (Tn CO<sub>2</sub> eq/million euros)

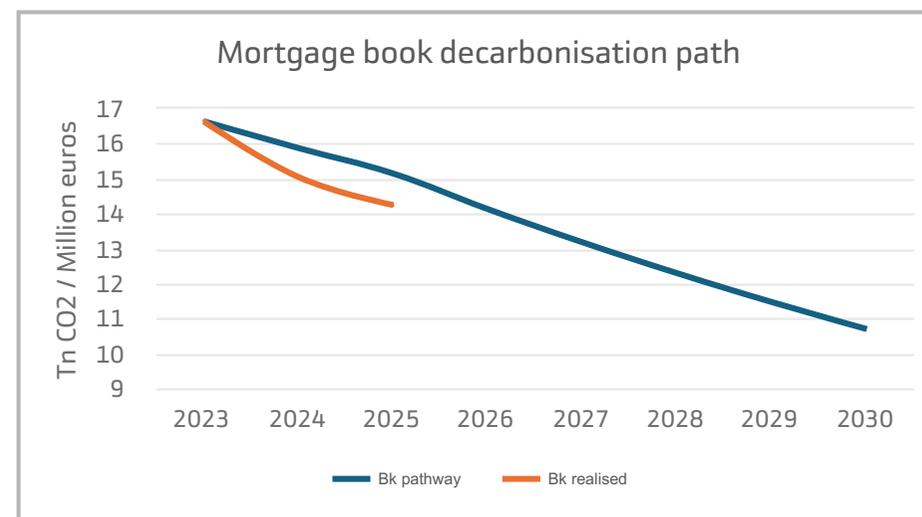
Bankinter Group has established a pathway to decarbonise its mortgage book, following the same system as for its corporate book. The ratio used is the same, tonnes of CO<sub>2</sub> per million euros financed. The goal for 2030 is to reduce the emission intensity of the mortgage book by 36% compared to 2023.

For its calculation, the emissions included in the energy efficiency certificates of each property acting as collateral are used, weighted by the LTV (Loan to Value) of each mortgage loan and divided by the outstanding balance of the financing.

This calculation is carried out for all mortgage books of Bankinter Group (Spain, Portugal and Ireland).

The slope of the target pathway that marks the speed of decarbonisation uses as a reference the PNIEC of Spain and its counterparts in Portugal and Ireland, specifically the data on household decarbonisation. It should be noted, however, that these objectives, although aligned with the official emissions reduction plans of the countries where the Bank is represented, are not validated by an external body such as SBTi.

This metric was incorporated into Bankinter's Risk Appetite Framework in 2025 and monitored monthly in the Global Risk Report.



#### Sectoral Decarbonisation Targets

Bankinter reinforces its commitment to sustainability and the fight against climate change by publishing its interim decarbonisation targets to 2030 for the most emissions-intensive sectors, in line with the Paris Agreements and UNEP FI recommendations, with the ultimate objective of achieving climate neutrality by 2050. These objectives, approved by the sustainability and appointments committee of the board of directors, will be reviewed periodically in order to adapt to developments in science, regulation and data availability.

Bankinter relies on recognised international standards to define the perimeter of its targets, the definition of metrics and the underlying sectoral decarbonisation assumptions. Accordingly, the calculation of the carbon footprint of financed books is carried out in accordance with the PCAF (Partnership for Carbon Accounting Financials) methodology. The identification of the most carbon-intensive sectors and the definition of sectoral targets are based on the guidance and criteria of the SBTi (Science Based Targets initiative). The projections and targets are based on: real data from counterparties and sectoral estimates and, on the other hand, in the scenarios developed by the NGFS (Network for Greening the

Financial System), the pathways used as a reference are those of the IEA (International Energy Agency) and the CRREM (Carbon Risk Real Estate Monitor) tool for the real estate sector. In addition, PACTA (Paris Agreement Capital Transition Assessment) is used to assess the sectoral alignment of books.

Bankinter prioritises target-setting in sectors with the greatest climate impact and material relevance within its book, including electricity generation, steel, oil and gas, residential and commercial mortgages, and coal. For each of these sectors, decarbonisation targets have been defined on the basis of the NGFS (NDC) scenario and the counterparties' own targets. In addition, the ambition of the targets obtained has been validated against 1.5°C scenarios such as the IEA NZE 2050 of the International Energy Agency and CRREM.

Targets are expressed in terms of reductions in emissions intensity (tonnes of CO<sub>2</sub> equivalent per unit of production or activity) for each sector. In the case of the coal sector, Bankinter has undertaken a specific commitment to reduction and orderly phase-out before 2030. These targets will be reviewed and progressively expanded as methodologies evolve and data availability improves. Bankinter supports its customers in the transition towards

low-carbon business models by promoting dialogue, advisory services and the financing of sustainable projects. The sectoral approach enables decarbonisation pathways to be tailored to the specific characteristics and challenges of each industry, thereby contributing to a just and orderly transition.

The Bank will periodically publish progress on the achievement of these targets, in line with the main international reporting and decarbonisation standards. It will also review its decarbonisation pathways to incorporate the most relevant scientific, regulatory and technological developments.

Bankinter recognises that the achievement of these targets depends to a large extent on the actions of third parties (customers, regulators, data providers, etc.) and on exogenous factors (technological developments, regulatory changes, market evolution, etc.); therefore, targets may be revised in light of developments in the broader context.

Sector	Stage of the entire value chain	Reference scenario	Scope of emissions	Metric:	Baseline year	Metric baseline year	2025	Reduction target 2030	Target 2030
Steel	Manufacturing	IEA Net Zero 2050	1 + 2	kgCO <sub>2</sub> e/t of steel	2024	1.3	1.2	23%	0.9
Coal	Mining	N/A	n/a	€mn	2024	<1	<0.5	100%	0
Energy	Electricity generation	IEA Net Zero 2050	1	kgCO <sub>2</sub> e/Mwh	2024	62.5	50.1	68%	20.2
Oil & Gas	Upstream, Midstream & Downstream	IEA Net Zero 2050	1 + 2 + 3	kgCO <sub>2</sub> e/GJ	2024	73.4	74.5	18%	60.2
Residential real estate	Ownership	CRREM 1.5°	1 + 2	kgCO <sub>2</sub> e/m <sup>2</sup>	2024	26.5	24.2	26%	19.8
Commercial real estate	Ownership	CRREM 1.5°	1 + 2	kgCO <sub>2</sub> e/m <sup>2</sup>	2024	19.0	21.2	27%	13.9

## Business with ESG criteria

One of the four pillars on which the business strategy against climate change must be based is development of sustainable financing/investment products that help customers adapt to a lower emission economy. Bankinter wants to do this using an inclusive strategy whose main objective is to help customers, companies and individuals in their decarbonisation processes, offering them financing with products that help them to reduce their greenhouse gas emissions, their adaptation to the effects of climate change and their ecological transition.

From the Risk area, the possible collaboration with these objectives is evident, since indicators such as the predisposition of a company to be affected by the risk of climate change, the physical risks derived from it, the answers to the questionnaires in the case of High or Very High climate risk or the Energy Efficiency Certificates, are indicators of possible investment needs and, therefore, of potential need for financing.

The new Sustainability Area has, in 2024 and 2025, incorporated responsibility related to commercial activity, business development and taking advantage of business opportunities with ESG criteria. Some of the initiatives developed in this area include:

- Incorporation into the Bank's management tools of the definition of which operations are sustainable according to the European Taxonomy and which operations are green, using the Sustainable Finance Classification Criteria and the Sustainability-linked Financing Structuring Guide. In addition, the Sustainable Labelling Unit examines and determines whether a transaction can indeed be considered sustainable or green and whether it can have related Sustainability indicators.
- Training plans for the Bank's staff related to sustainability, climate risk, decarbonisation plans, risks and related business opportunities.
- Collaboration agreements with expert suppliers that allow them to advise on sustainability issues that can help our customers in the development of their decarbonisation strategies, ecological transition and fulfilment of their objectives.
- Internal dissemination of good market practices that allow for a better understanding of their application and sharing the knowledge acquired to identify the needs and opportunities of our customers.
- Creation and development of products with ESG criteria that can help in the decarbonisation of business or household activities, as well as in their ecological transition. These include the financing of renewable energies, issuance of green bonds, sustainable investment funds, financing linked to sustainability criteria, financing of property refurbishment that improves energy efficiency, and green mortgages. In addition to financing lines already standard at Bankinter, other more innovative products specifically related to climate change, included in this business plan, involve providing customers with features such as sustainability certificates, advice or specific working capital lines for customers or sustainable suppliers.

The following provides a more detailed description of the Group's efforts in collaborating with customers in this transition towards a more sustainable economy over the long term, notwithstanding future regulatory changes that may affect the sectors it is financing.

For corporate banking, Bankinter has developed a segmented action plan to support corporate customers in their CO<sub>2</sub> footprint reduction and transition plans.

- Corporate & SME Banking: larger Corporate & SME Banking customers tend to be advanced in their transition plans and demand banking services that support their transformation. Bankinter offers sustainability-linked financing, whether term or working capital, structured financing, project financing and sustainable loans and credits.
- Medium-sized businesses: companies in intermediate turnover brackets are in an unequal situation. From more advanced companies that have already established the transition plans they are implementing, similar to Large Corporates Banking, to less mature ones that are just beginning to work on these aspects, generally starting with reporting obligations. Bankinter recognises that it can play a role in guiding these companies, given its sectoral knowledge, but not in advising them due to the degree of specialisation required. To support the latter, Bankinter has developed a set of alliances with third parties that offer solutions for the development of decarbonisation plans and their execution, requests for aid, management of energy saving certificates and the provision of capital goods, self-consumption equipment, electric or plug-in hybrid vehicles, among others.
- Small businesses: these show only an emerging concern for sustainability and rarely implement actions related to footprint measurement or transition plans, unless required to do so by their customers, whether public or private. Bankinter is approaching these customers by offering solutions that, in addition to reducing emissions, improve the efficiency and costs of small businesses.

Since not all of these businesses are under equal pressure to initiate a transition plan, Bankinter has developed a rating for customer transition need and urgency to address the value proposition described above in the most efficient way. The rating is based on an analysis of the regulatory burden, the Bank's internal climate rating, pressure on the supply chain and CO<sub>2</sub> emissions, among other parameters.

Among the most notable developments in this segment during 2025 are:

- The launch of the CAE advance loan product, in which Bankinter has been a pioneer, allows customers to advance both the value of energy-saving consumption from their CAE (Energy Savings Certificates) initiatives and the amount from the monetisation of CAEs that they have agreed with third parties through private contracts or agreements.
- The structuring and coordination of green and sustainable bond issuances for customers through Bankinter Investment.
- Advisory service for customers in relation to their decarbonisation plans.
- Distribution agreements for products related to sustainable mobility and renewable energy self-consumption.
- ESG solutions for SMEs.

In Wealth and Retail Banking, the needs of individual customers are primarily limited to the acquisition or refurbishment of housing, electric vehicles and other consumer goods. The acquisition of sustainable housing is channelled through the Efficient Mortgage product. Mortgage financing is categorised as sustainable based on the climate zone and energy consumption. Bankinter has substantially improved the quality of information relating to energy certificates and their periodic updating.

The rest of the financing associated with Wealth and Retail Banking is managed through consumer lending. Agreements have been reached with third parties to provide advisory and installation services for self-consumption solutions.

As a key development in 2025, the launch of the "Ecoreforma" loan and its energy efficiency simulator is noteworthy.

Furthermore, Bankinter is also updating its Risk Appetite Framework to effectively integrate climate and environmental risks into its corporate strategy. This process seeks to ensure sustainable and responsible management, aligned with regulatory standards and best practices in the financial sector. The Bank is evaluating how climate change-related exposures may impact its operations, customers and investments in the long term.

Moreover, in the investment business, Bankinter's ESG investment products are designed to offer customers solutions that combine financial return with a positive impact on the environment and society. These products respond to the growing demand from investors interested in supporting sustainable and responsible projects. They also reinforce the bank's commitment to sustainability and contribute to generating long-term value for both customers and society in general. In this case, Bankinter offers its customers alternative investment vehicles in renewable energy and the circular economy, its own investment funds and pension funds classified as Article 8, as well as third-party investment funds classified as Article 8 and Article 9.

In addition, Bankinter's digital investment manager launched its first sustainable portfolios in 2021, which invest in funds from the world's leading asset managers that meet environmental, social and good corporate governance criteria.

The entire ESG business plan is accompanied by an ambitious ESG training plan for the entire commercial network workforce.

## Monitoring

The main lines of monitoring of indicators related to climate risks that the Bank has developed are as follows:

- Risk Appetite Framework. During the year, the evolution of three indicators related to climate risks continued to be monitored within the Risk Appetite Framework.
  - Intensity of Scope 1 emissions financed: covers the corporate books of Spain and Portugal.
  - Average intensity of emissions financed from the mortgage book for individuals: covers all geographical areas.

- High and Very High Risk exposure limit according to the climate rating in the loan book: covers the corporate books of Spain and Portugal

As the climate rating evolves towards a global indicator that incorporates environmental objectives, the latest metric will also include limits on environmental risks.

- Information incorporated into the Business Intelligence management tool.

Within the Bank's information and management systems, which are accessible to the entire network, information is available relating to the main climate risk indicators, particularly the climate rating for the Corporate & SME Banking book and Energy Efficiency Certificates for the mortgage book.

Furthermore, by cross-referencing them with the rest of the previously available information, it is possible to obtain data on prices, credit quality, sectors of activity, behaviour, guarantees, terms, branches and areas, etc.

- Global Risk Report.

This report is updated monthly, is made available to members of the board of directors and includes a summary of the main climate risk indicators.

### 13.3.7. European Taxonomy requirements

#### Regulatory Framework

This document includes the ESG risk disclosure exercise required under Article 449a of the Capital Requirements Regulation (CRR). More precisely, Bankinter is obliged to disclose the following quantitative information templates (the qualitative part is included in the text of this chapter on ESG Risks):

Prudential disclosures on ESG risks (Article 449a of the CRR)

Template number	Name
1	Banking book – Climate change transition risk: Credit quality of exposures by sector, issues and residual maturity
2	Banking book – Climate change transition risk: Loans collateralised by immovable property – Energy efficiency of the collateral
3	Banking book – Climate change transition risk: Alignment metrics
4	Banking book – Climate change transition risk: Exposures to top 20 carbon-intensive firms
5	Banking book – Climate change physical risk: Exposures subject to physical risk
6	Summary of GAR KPIs
7	Mitigating actions: Assets for the calculation of GAR
8	GAR (%)
9	BTAR (Banking Book Taxonomy Alignment Ratio)
10	Other climate change mitigating actions that are not covered in the EU Taxonomy

Within the framework of the disclosure obligations established by Pillar 3 in relation to ESG risks, the following sections will not be published for the year-ended 31 December 2025:

- > Green Asset Ratio (GAR) – Templates 6 to 8
- > Banking Book Taxonomy Alignment Ratio (BTAR) – Template 9
- > Other mitigation measures – Template 10
- > Columns “of which: environmentally sustainable” in Templates 1 and 4

Within the context of simplifying ESG requirements in Europe, and following the letter of no action published by the EBA (6 August) on the application of Pillar 3 ESG disclosure requirements, templates 6 to 10 (which include information on GAR, BTAR and other mitigation measures) are suspended during the transitional period until the entry into force of the implementing technical standards (ITS), currently under review. However, the Group is continuing to work internally on the development and calculation of the GAR, which is published in the 2025 Consolidated Statement of Non-Financial Information and Sustainability Information.

#### Templates

Sections 13.6 and 13.7 (Indicators of potential physical and transition risks linked to climate change) incorporate the templates relating to Implementing Regulation 2022/2453 on the disclosure of ESG risks in Pillar III.

## 13.4. Social risk

### 13.4.1. Business strategy and processes

As previously mentioned, Bankinter's sustainability strategy has materialised in the DNA 24-26 Multi-Year Sustainability Plan, established with the aim of developing responsible management in three main pillars: responsible action, differentiation and sustainable business, to generate a three-fold impact on the geographies in which the Group operates.

This Plan was designed as a result of a materiality analysis with the Bank's stakeholders, which concluded by identifying the most relevant issues that Bankinter should integrate into its strategy and respond to the expectations of its stakeholders.

The dual materiality analysis was updated in 2025, in accordance with the CSRD regulations, updating the list of material IROs.

With regard to social matters, a distinction was made between issues related to the company's own staff and customer staff (in line with the CSRD's NEIS S1 and S4 standards).

#### Own staff

In this exercise, no material risks or opportunities related to the company's own workforce have been detected, but positive and negative impacts have been detected.

Most of the material impacts identified related to Bankinter's own staff affect the entire salaried workforce of Bankinter, covering all the geographies in which the Bank has a presence. This staff is made up of working individuals hired directly by the Bank, who represent the core of the organisation's Human Resources.

The material IROs in this standard and the way in which they are integrated with the bank's strategy are presented below.

The commitment to freedom of association, collective bargaining and social dialogue guarantees a collaborative and transparent work environment, promoting more sustainable labour relations that enable effective conflict resolution and support the organisational stability necessary for the execution of the business model. The Group demonstrates its firm commitment to respect for labour standards, trade union rights and freedom of association and collective representation, making available to workers different channels to express their opinions, conflicts or needs, including channels of social dialogue and participation appropriate to overcome conflicts or differences between the parties and reach agreements within the labour framework.

Promoting the physical, emotional, and social well-being of staff through health, safety, and prevention initiatives that exceed regulatory requirements has a positive impact by contributing to productivity, reducing absenteeism, and strengthening team resilience. In this context, the "Bankinter te cuida" programme promotes various activities and actions aimed at health and well-being. In addition, 100% of the staff is covered by health and safety systems, which ensures that all Bankinter employees benefit positively from this impact. Complementarily, Bankinter promotes a safe, respectful, and harassment-free work environment, supported by a Group-wide Prevention and Action Protocol and a confidential

reporting channel accessible to staff, which reinforce ethical human capital management, help mitigate occupational risks, and promote team cohesion.

The promotion of diversity and inclusion in the workforce and governance bodies, through encouraging diverse profiles by age, gender, culture, and abilities, is fully integrated into Bankinter's strategy and its talent management and corporate governance model. This approach, supported by the principles of equal opportunity and non-discrimination included in the Group's Second Equality Plan, helps strengthen the entity's capacity to attract, develop, and retain diverse talent, incorporate new perspectives, and ensure the long-term sustainability of the business. The integration of diversity into recruitment, professional development, and strategic decision-making processes strengthens the teams critical to executing the strategy, fosters growth based on meritocratic criteria, and generates positive impacts for potentially vulnerable groups. Likewise, promoting greater diversity in governance bodies, with a balanced and increasing representation of women, reinforces governance quality, improves the management of strategic and reputational risks, and supports more inclusive decisions aligned with stakeholder expectations and the Group's ESG strategy.

Training and learning activities are aligned with the strategy of strengthening human capital, which is key to the sustainability of the business model. Boosting the knowledge and professional skills of its staff enables Bankinter to respond quickly to the challenges of the financial environment and to customer demands. Continuous training contributes to generating a positive impact by improving internal employability, retaining talent and ensuring that teams are prepared to face strategic challenges. Based on the Bank's strategic plan, the Training and Talent team designs a training plan each year to support Bankinter's growth strategy and its various initiatives. This plan is guided by the area's mission: identify current and future talent, plan succession and train staff. Its aim is to ensure that all staff have the knowledge and skills necessary to perform their current role and prepare for more complex roles in the future. All employees of Bankinter Group have benefited, in one way or another, from this type of training programme.

These training plans focus on employee training in privacy and cybersecurity with the aim of reducing the risks of personal data breaches, protecting the Bank's critical assets. These initiatives strengthen technological resilience and ensure operational continuity, key factors for the success of the business model. Bankinter's Digital Security awareness and training plan, aimed at the entire workforce, reinforces the culture of compliance in terms of privacy and information security. This commitment is based on three core pillars: privacy, ensuring respect for fundamental rights to data protection in accordance with the Charter of Fundamental Rights of the European Union; transparency, ensuring that data subjects are aware of how their data is processed in compliance with the GDPR and other applicable regulations; and computer security, by implementing measures to prevent security breaches and unauthorised access. These actions generate a positive impact by strengthening staff skills and mitigating risks associated with data management and digital security.

Fair and transparent remuneration management is a key element of Bankinter's strategy to attract, develop, and retain talent, while ensuring competitive and market-aligned compensation conditions. The Group's Remuneration Policy establishes a common framework based on internal equity, external competitiveness, and the application of

objective and non-discriminatory criteria, while also incorporating mechanisms that allow compensation to be adapted to the workforce's needs within a regulated and transparent environment.

In this context, gender-based pay inequalities are identified, reflected in a salary gap in accordance with the methodology and criteria established by the applicable legislation. Active management of this impact is integrated into Bankinter's people strategy through the deployment of policies, controls, and measures aimed at progressively reducing these differences, reinforcing transparency, internal equity, and compliance with commitments made on equality. This approach helps consolidate the Group's positioning as a responsible and inclusive employer and strengthens employee trust, engagement, and stability.

Work-life balance has been identified as a potential negative impact to the extent that the programmes and measures implemented at Bankinter do not meet all individual needs and sensitivities, which may be reflected in internal surveys. Bankinter has a wide range of work-life balance measures in place, which not only includes recent legislative developments, but also improves in many aspects the measures established in such legislation. Despite this, Bankinter analyses all these individual opinions and constantly seeks alternatives for improvement in its work-life balance and flexibility initiatives and programmes, with the aim of improving satisfaction and perception of well-being for the entire workforce. This management is directly aligned with Bankinter's sustainability and talent care strategy, aware of its importance in impacting the general perception of the work environment, the bank's ability to retain key talent and, ultimately, improve the organisation's efficiency and productivity.

### **Dialogue with our staff**

At Bankinter, employee participation is a core pillar in the design and development of corporate strategies and the bank's business model. Employee well-being and engagement are recognised as key factors for sustained success and achieving organisational objectives. The company therefore continuously integrates the opinions, interests and rights of its own staff into strategic and operational decision-making, ensuring a sustainable and responsible approach that respects human rights and promotes equality, diversity and inclusion.

The collection of opinions from our own staff is carried out through various communication channels, which include both general tools and media designed for specific topics. Each of these channels is managed by the team in charge of its supervision, which guarantees an adequate and professional treatment of the contributions collected. Likewise, the procedures for integrating these contributions into the strategy or business model vary according to the nature and scope of each channel, allowing for specific adaptation that maximises the impact of the proposals. The main channels of dialogue with the staff are: climate surveys, internal quality surveys, Business Partners, collective bargaining channels, specific channels for training, channels for new hires, specific channels for matters related to health and safety, such as the Bankinter Te Cuida (Bankinter takes care of you) programme, etc.

### **Policies and procedures**

Bankinter Group's Sustainability Policy sets out the bank's basic people-management and human-rights principles, which affect all the impacts identified: This policy established that the bank:

- Guarantee a human resources management system that fosters their well-being and engagement through work-life balance measures, personal and professional development, and safety and health, while also fostering the inclusivity and diversity of the workforce.
- Respect human rights in all territories in which the Group operates, in accordance with its Human Rights Principles and under the guidance of the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Declaration on Fundamental Principles and Rights of Workers and other internationally recognised codes, such as the UN Global Compact.

Given that Bankinter operates directly exclusively in countries of the European Union, where the risk of incidents related to forced labour, child labour or human trafficking is considered low, no specific policies have been developed that explicitly address these risks. However, within the framework of the human rights due diligence process, the Bank has assessed and covered risks related to both its direct activity and potential impacts arising from its financial activity. These risks include human trafficking, forced labour, child labour, freedom of association, the right to collective bargaining, equal pay, discrimination, work-life balance, the right to privacy and the right to fair and favourable working conditions. In this way, Bankinter ensures respect for human rights in all aspects of its activity.

### Human Rights Policy

The objective of the Human Rights Policy is to reflect the Group's commitment to respect, support and protect human rights in the development of its activity and in its relationship with stakeholders within the environment in which it operates. The principles governing this policy are divided according to the stakeholder group to which they are directed. With regard to its own staff, Bankinter is committed to promoting a fair, inclusive and respectful work environment. Its key principles include the promotion of equal opportunities and professional development based on merit, as well as the implementation of measures that favour the reconciliation of work and personal life. The Bank guarantees decent, competitive remuneration in line with market standards, also ensuring a work environment free of harassment, violence or discrimination. Bankinter also respects and promotes freedom of association and the right to collective bargaining. In terms of health and safety, the organisation rigorously complies with current regulations, implementing proactive measures to protect the physical and emotional well-being of its staff.

This policy is applicable to the whole organisation and affects all the Group's workers, as well as the rest of the stakeholders involved. The sustainability committee is responsible for approving, monitoring and periodically controlling compliance with the guidelines set out in this policy.

The document identifies the Universal Declaration of Human Rights, the Guiding Principles on Business and Human Rights, the ten principles of the United Nations Global Compact and the Declaration of the International Labour Organization as reference standards.

The policy is made available to staff and other stakeholders through the corporate website and internal intranet.

#### Health, Safety and Well-being Policy

Activities aimed at the health, safety, and well-being of employees are supported by Bankinter Group Health, Safety, and Well-being Policy, which seeks to promote a culture of care and respect in these areas, both internally and externally. This policy sets out the general principles and lines of action to ensure the safety, health, and well-being of the bank's own personnel and of those present in Bankinter Group workplaces in Spain. It also defines the key roles and responsibilities to ensure its effective implementation. The policy has a comprehensive scope, covering all operations, activities and phases of the value chain, as well as all regions in which the bank operates.

The People Management, Communication and Quality Division, through the Occupational Risk Prevention areas, will be in charge of ensuring the application of this policy. Compliance and continuous improvement of the policy is ensured through regular audits and reviews, with the Bankinter sustainability committee ultimately responsible for its approval.

This policy is governed by the regulations of the Law on the Prevention of Occupational Risks and the ISO-45001 regulations and is available to all interested parties on the Intranet and on the corporate website.

Bankinter Portugal and Bankinter Ireland have a health and safety policy that meets the specific requirements of the country, but is aligned with the Group's general policy.

#### Inclusion and Diversity Policy

Material impacts relating to equal treatment and opportunities in the company are managed, among other documents, through the Inclusion and Diversity Policy. The objective of this policy is to fulfil the commitment to protect and promote compliance with human rights and applicable laws in the countries in which the Bank operates on diversity and inclusion, guaranteeing equal opportunities, providing fair and non-discriminatory treatment without associated bias of any kind. This policy is corporate in nature and applies to all Bankinter Group employees.

The corporate sustainability committee is responsible for approving this policy and monitoring the degree of compliance with the principles contained therein, agreeing on any modifications and improvements that may be necessary.

The document identifies the Universal Declaration of Human Rights, the Guiding Principles on Business and Human Rights, the ten principles of the United Nations Global Compact and the Declaration of the International Labour Organization as reference standards.

This policy is publicly available on the Bank's corporate website and internal intranet.

#### General Remuneration Policy

The Group's Remuneration Policy aims to ensure that remuneration systems are aligned with the Group Bankinter's strategy and long-term objectives, including collective objectives that may be environmental, social, and governance ("ESG") in nature, the corporate culture and values, the risk culture of the Institution and its Group, as well as measures implemented to prevent conflicts of interest.

This policy was approved by Bankinter's board of directors at the proposal of the remuneration committee. Bankinter has established a governance model to ensure that remuneration policies and systems within the Group comply at all times with the framework of current regulatory provisions and good corporate governance standards, adapting them to the core principles contained in the recommendations of the Financial Stability Board, in the guidelines of the European Banking Authority, in European regulations, in the recommendations of the Unified Code of Good Governance and in current national regulations.

The principles of Bankinter Group's General Remuneration Policy are available on the Institution's corporate website.

#### Internal Rotation Policy

With regard to internal growth opportunities, Bankinter Group's Internal Rotation Policy aims to develop an internal framework that ensures internal rotation processes to promote the professional growth and development of people, while contributing to meeting business needs and guaranteeing the homogeneity of the criteria applied when managing internal rotation processes in all Bankinter Companies. This policy sets out the general principles that govern Bankinter Group's internal rotation processes, which are equality, diversity, meritocracy, objectivity, confidentiality and consistency with the Group's business strategy.

This policy applies to all the companies that form part of Bankinter Group, constituting the reference document on internal rotation. It has been approved by the People, Corporate Communication and Quality division and is of indefinite duration, and may be revised to make any changes or modifications that may be appropriate.

The policy is expanded in Bankinter Group's Internal Rotation Circular, which establishes that participation in the internal rotation systems is open to all Bankinter Group employees, and will be governed by the general principles set out in Bankinter Group's Internal Rotation Policy, these being equal opportunities, non-discrimination on any grounds (gender, age, race, religion, nationality, marital status, sexual orientation, social class or disability), equal treatment and respect for people and their abilities.

Both documents, the policy and the circular, are published on the corporate intranet, in a space dedicated to content related to internal vacancies, which also includes information on the internal vacancy process and some recommendations for candidates participating in this type of process.

### Selection and Succession Policy for members of the Bankinter board of directors

The Bankinter Board Selection and Succession Policy establishes the principles and procedure for the selection and replacement of members of the board of directors, which, together with the Policy for Assessing the Suitability of Board Members, ensures that proposals for the appointment and re-election of directors are based on a prior analysis of the board's needs and comply with regulatory requirements and best practices in the field. This policy will apply to the selection of Bankinter directors.

Among the general principles that govern this Policy, one has been established that explains that Bankinter will seek diversity of nationalities, gender and experiences, in such a way that decision-making is enriched and plural points of view are contributed to the debate on matters within its competence.

This policy is updated, revised and approved by the Bankinter board of directors, following a proposal from the sustainability and appointments committee. In this regard, during financial year 2025, the Policy was reviewed and approved by the board of directors in its meetings of 27 March and 17 December 2025, at the proposal of the sustainability and appointments committee.

For more information, consult the 2025 Annual Corporate Governance Report available on the Institution's corporate website.

### Ethics and Conduct Code

The Code of Professional Ethics is the document that contains the corporate principles and values that guide the professional conduct of all Bankinter Group employees and collaborators. Further relevant information on this code is detailed in section 4.3 Ethics and Conduct Code.

The Ethics and Conduct Code establishes several general principles relating to the bank's employees. Non-discrimination on the basis of race, sex, ideology, nationality, religion, sexual orientation or any other personal, physical, psychological or social condition is established, as well as the promotion of equal opportunities among workers. Likewise, any form of harassment or workplace violence is rejected, guaranteeing a work environment that respects physical and moral integrity. In addition, the reconciliation of personal and work life is encouraged, respecting the personal lives of employees and promoting policies that facilitate this balance. The right to privacy is guaranteed, in strict compliance with data protection regulations. In terms of occupational health and safety, it adopts preventive measures in accordance with current legislation to protect its staff and ensure a safe working environment.

### Group Privacy Policy

In the interests of consolidating an organisation-wide culture of compliance with privacy regulations, within this policy, it is established that Bankinter Group draws up and implements a privacy and data protection training plan for all obligated subjects.

Further information on this policy is provided in the following section on customers.

### Digital Disconnection Policy

The main objective of this policy is to ensure the digital disconnection of Bankinter Group staff once the working day has ended, promoting occupational health and a better balance with their personal and family life. This policy is applicable to all professional levels at Bankinter and the companies of the Group.

### **Customers**

The incidents, both current and potential, as well as the Group's risks in relation to all consumers or end users, regardless of their characteristics and capabilities, are intrinsically linked to the Group's strategy as a provider of financial products and services. Therefore, the incidents identified in the double materiality analysis serve as a basis and contribute significantly to the adaptation of the company's strategy and business model. The analysis carried out has made it possible to identify material incidents, risks and opportunities exclusively related to the bank's own activity in terms of its relationship with customers and end users. No material IROs have been identified associated with its value chain, which indicates that the processes, suppliers and other external actors linked to the bank's operations do not have significant impacts that could affect the bank's customers or end users.

As noted above, customers are one of the Group's most important stakeholders and the Bank therefore seeks to minimise negative impacts, increase positive impacts and mitigate risks.

The Bank is aware of the current and anticipated effects of IROs on its business model, strategy and decision-making. As part of its comprehensive approach, the bank has introduced and plans to continue introducing adjustments to its strategy and business model to adapt to these effects. This includes modifications to processes and services to mitigate risks, take advantage of relevant opportunities and ensure that responses to incidents are effective, aligned with consumer expectations and needs.

To assess the effectiveness of the remedial measures, the Bank conducts ongoing monitoring through different channels and procedures, each with its own control, monitoring and effectiveness evaluation mechanisms, which will be detailed in the following sections. This approach ensures that the actions implemented are effective and adequately respond to consumer expectations and needs.

One of these incidents is related to the privacy and data protection of customers. At Bankinter, it is a core pillar of its strategy and business model, as it has a direct impact on customer confidence, market competitiveness, regulatory compliance and innovation capacity. Customers trust the bank to manage sensitive information, such as personal data, financial records and transactions. Ensuring privacy not only reinforces that trust, but is also key to preserving long-lasting relationships. Data loss or privacy breaches can severely impact a bank's reputation, leading to potential loss of customers and credibility.

Bankinter Group is characterised by its commitment to privacy and the protection of the personal data of its customers, shareholders, staff, suppliers and other subjects whose data may be processed. In compliance with its legal obligations, the bank has developed a framework of internal policies and procedures, including the Security Incident Management

Procedure, which establishes the methodology necessary to assess the risks inherent to the processing of personal data and apply effective measures to mitigate them.

Bankinter has specific procedures in place to ensure appropriate management in the event of an incident that may compromise the confidentiality, integrity or availability of personal data. These procedures are mandatory for all employees of the organisation, who are responsible for immediately notifying the Information Security department of any incident affecting personal data. This allows for proper investigation and the adoption of sufficient measures to prevent similar situations from recurring.

In addition, the bank has a Data Protection Officer who plays an active role in managing incidents, assessing the impact on the privacy rights of data subjects and complying with current regulatory obligations. In the event that an incident poses a high risk to privacy, the relevant supervisory body and, if necessary, the affected data subjects will be notified. Bankinter operates under a firm commitment to current regulations, such as the General Data Protection Regulation (GDPR) in Europe, which establish strict obligations on how data is collected, stored and processed.

Adapting to these legal frameworks allows avoiding economic and legal sanctions, in addition to reinforcing the bank's image as a responsible and transparent organisation. In a digitalised financial environment, Bankinter understands that the lack of protection measures can increase exposure to risks such as cyberattacks and fraud, so it implements advanced data protection strategies that minimise these risks and ensure business continuity, protecting both its customers and the organisation itself.

This commitment to privacy and data protection, beyond being a legal obligation, is an essential component of Bankinter's strategic vision, which guarantees relationships of trust with interested groups and consolidates its position in the financial market.

Another of these material incidents is the [communication of complaints or claims](#) regarding operations, banking and financial services by customers. In this sense, Bankinter's Customer Service area plays a strategic role in aligning customer relations with the bank's business and corporate objectives. Its integration into the organisational model ensures that customer experience and regulatory compliance are core pillars of the global strategy.

The Customer Service area supports the business strategy by regularly sharing its findings with the Regulatory Compliance and Legal Counsel areas, guaranteeing a comprehensive and proactive vision of the risks and opportunities related to customers. This way, it contributes to mitigating operational risks and strengthening the bank-customer relationship, a key differentiating factor in the market.

Regarding the negative impact: To mitigate 'consumer dissatisfaction arising from significant problems in the [overall customer experience](#)', Bankinter relies on the system of customer surveys conducted by the Quality division. As previously mentioned, the NPS (Net Promoter Score) indicator is followed, with the aim of analysing and understanding possible negative experiences.

Furthermore, reputational risk is a strategic issue for Bankinter because it can negatively affect customer perception and trust, which in turn impacts loyalty, satisfaction and, ultimately, the Bank's income. Failure to meet customer expectations of products and

services can lead to a loss of trust and reputation, which is crucial in the financial sector, where trust is key.

To mitigate this risk, Bankinter applies various strategic measures. First, it ensures that all its products and services comply with industry regulations and standards. In addition, it works on the continuous improvement of its offer, with the aim of satisfying and exceeding the expectations of its clientele.

It also maintains clear and transparent communication, informing users about the characteristics of the products and services, as well as any possible changes or incidents. To strengthen its response capacity, the Bank has crisis management plans that allow it to react quickly to any situation that may affect its reputation.

Finally, Bankinter trains its team to understand the importance of corporate reputation and the impact of its actions on the perception of the bank.

The nature of the financial sector involves handling sensitive customer information and critical operations, making it especially vulnerable to cyberattacks and digital fraud. Bankinter has highlighted cybersecurity as a key strategic priority. The bank has implemented an Information Security Master Plan that includes several phases and projects to guarantee the confidentiality, integrity and availability of information for customers, staff, shareholders and suppliers.

Some of the measures adopted include the use of advanced technology for data protection and the simulation of constant attacks, training and awareness of the staff through online programmes and simulations and security certifications such as ISO 27001 and ISO 22301 to guarantee the quality of the processes.

Bankinter's Information Security Master Plan covers various key areas within the organisation. It focuses on technological risk management, ensuring regulatory compliance, developing specific policies, implementing business continuity plans and carrying out detailed risk analyses. It also gives high priority to cybersecurity, protecting customer data by constantly simulating attacks against the Group's systems and promoting continuous improvement against potential cyber threats. Additionally, the plan includes a focus on security monitoring and fraud prevention, with constant monitoring of communications, transactions and security analysis of applications. All of these initiatives work together to ensure the confidentiality, integrity and availability of information within the organisation.

The IROs identified as 'Operational risk due to a cyberattack that compromises business continuity' and 'Security in the protection of customers' financial and/or personal data' are directly linked to the incidence of "Leakage of confidential or sensitive customer information". As previously noted, privacy and data protection, along with cybersecurity, have been consolidated as core strategic pillars in the Bank's strategy. These areas involve all workers through specific training, in addition to promoting awareness among customers.

By preventing costly incidents and complying with regulations, the Bank avoids sanctions and financial losses that could reach millions of euros, reinforcing its stability and sustainability. Thus, Bankinter not only protects. It also boosts business and ensures an environment of trust.

## Dialogue with customers

Dialogue and collaboration with stakeholders are essential for the Bank, as they allow it to understand the opinions, interests and rights of consumers and end users, as well as integrate these aspects into its strategy and business model. This approach not only makes it easier to identify, manage and mitigate risks, but also helps take advantage of opportunities to improve customer experience. It also reinforces the Bank's commitment to transparency, inclusion and continuous improvement of its financial products and services.

In this context, the incidents, both current and potential, as well as the Group's risks in relation to all consumers or end users, regardless of their characteristics and capacities, are closely linked to the Group's strategy as a provider of financial products and services. Therefore, the incidents identified in the double materiality analysis serve as a basis and contribute significantly to the adaptation of the company's strategy and business model.

Bankinter has various communication channels designed to facilitate the exchange of information with its customers. These channels are designed to gather their interests and opinions and to preserve their rights, including respect for human rights, an aspect to which Bankinter is firmly committed through its human rights policy. In addition, it allows for effective interaction that strengthens the relationship with the bank. Available media include digital options, such as apps and online platforms, as well as traditional and in-person channels, which seek to adapt to different customer preferences and characteristics. This approach allows for structured management of the information received, which can be used to adjust or improve the organisation's services and processes.

The Bank has a structured approach to identifying, remediating and preventing negative incidents that may affect consumers or end users. In the event of detecting that it has caused or exacerbated a relatively significant incident, it activates various repair mechanisms, ensuring a quick and effective response. These mechanisms include procedures for resolving incidents through the Customer Service area, the resolution of digital security incidents, the implementation of transparency measures in the commercial relationship and the continuous improvement of products and services based on the analysis of quality surveys. Each of these procedures is designed to address the incidents, ensuring that the consumer receives an appropriate and timely solution.

## Policies and procedures

The following describes the key policies, processes and actions that the Bank has in place to manage its incidents, risks and opportunities of relative importance, all of which are related to consumers or end users, since they may affect all customers, regardless of their characteristics or capabilities.

There are more extensive documents that, although they do not constitute a specific policy directed exclusively to customers or users, address key aspects of the bank's relationship with its customers.

## Sustainability policy

Bankinter Group's Sustainability Policy recognizes customers as one of its main stakeholders and gives them priority attention, in line with their strategic relevance. This approach is reflected in the incorporation, within this Policy, of the principle of ensuring a balanced, accessible, honest, transparent and clear relationship with customers and with all its stakeholders, through the offering of products aligned with their needs and the provision of quality service.

In addition, the Group undertakes to respect human rights in all territories in which it operates, in accordance with its Human Rights Principles and guided by the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Declaration on Fundamental Principles and Rights at Work, and other internationally recognised codes, such as the United Nations Global Compact.

The Sustainability Policy was approved by the board of directors, the body also responsible for supervising its correct application and compliance, through the strategy defined in the DNA Sustainability Plan.

For more information see section 1.4.2. the Group's commitment to sustainability.

## Ethics and Conduct Code

Bankinter's Ethics and Conduct Code ensures that the relationship with customers is based on transparency, respect and the best banking practises. It guarantees the protection of personal data, which is treated confidentially and prohibits conduct that may mislead or violate the rights of customers. It also promotes training for employees in data protection and business ethics and establishes official channels for managing complaints, always ensuring fair and transparent treatment.

The Bankinter board of directors is responsible for approving and supervising the Ethics and Conduct Code.

For more information see section 4.3. Ethics and conduct codes.

## Human Rights and Due Diligence Policy

The main objective of Bankinter's Human Rights Policy in relation to customers is to guarantee balanced, transparent and clear treatment, developing products and services adapted to their specific needs and circumstances. Bankinter promotes equal access to its services for all people, ensuring that customer relations are always governed by principles of professionalism, respect and ethics.

To this end, Bankinter assumes the commitments contained in recognised international protocols and standards, including the Universal Declaration of Human Rights, the Guiding Principles on Business and Human Rights, the ten principles of the United Nations Global Compact, the Declaration of the International Labour Organization and the Equator Principles.

The policy was approved by the sustainability committee, which is responsible for monitoring and enforcing it.

Bankinter's Human Rights Due Diligence Process guarantees the protection of its customers' fundamental rights through transparent relationships tailored to their needs. It includes measures to protect personal data, comply with applicable regulations and manage complaints through tools such as the Customer Service area (SAC) and a confidential whistleblowing channel. Their approach focuses on building relationships based on ethics, trust and mutual respect.

Following the analysis of these possible claims, it is the Internal Audit department that examines the cases, reporting its conclusions to the crime prevention and business conduct committee (for further information see sections 4.2 Business conduct and 4.3 Codes of ethics and conduct). Just as in 2024, in 2025 no cases related to human rights violations have been reported.

### Privacy

Bankinter Group's Privacy Policy regulates the general principles that the organisation must apply to guarantee customers' right to privacy. Its main objective is to guarantee respect for the right to privacy and the protection of customers' personal data, in accordance with the General Data Protection Regulation (GDPR). The Privacy Policy applies to Bankinter S.A. and to the different subsidiaries and branches forming part of Bankinter Group and covers all activities related to the processing of personal data.

Bankinter Group's Privacy Policy commits to complying with the GDPR and any other applicable data protection regulations in the countries in which it operates.

Responsibility for implementing the Policy rests at the highest level of the organisation, ensuring that all regulations are followed and customers' privacy rights are respected. Finally, the Privacy Policy is made available to all stakeholders through Bankinter Group communication channels, ensuring that interested parties and those required to support its implementation have access.

This policy also defines the organisational structure regarding privacy implemented in Bankinter Group. This structure ensures that any initiative undertaken or any processing carried out that may have an impact on the right to privacy and the right to data protection complies with the regulations in force on this matter.

This organisational structure is made up of the following bodies:

- Privacy committee: a collegiate body whose main function is to promote and approve initiatives of strategic importance for Bankinter Group when these may affect customers' privacy rights. This committee is comprised mostly of senior management. The Chairman of the privacy committee reports at least annually to the audit committee on the committee's activities.
- Corporate Privacy and Data Protection Officer. Its main function is to coordinate the various Privacy and Data Protection Officers of the companies that make up Bankinter Group.

- Privacy and Data Protection officers of the various entities that form part of Bankinter Group, whose functions are defined by the applicable regulations. Its functions include acting as a point of contact with the relevant supervisory authority and with customers regarding the processing of their personal data by the responsible parties.

Each Data Protection Officer has created an email address so that customers can contact them directly with questions as necessary about the processing of their data or specific incidents, which the Officer will review and respond to. The Delegate's contact channels are communicated to customers through the various data protection clauses they sign.

Both the organisational structure and the governance framework implemented by the organisation in matters of privacy and data protection ensure that Bankinter Group can meet its objective of guaranteeing the highest respect for customer' privacy and personal data protection.

To achieve this objective, Bankinter Group relies on four basic pillars:

- Compliance culture: Bankinter Group guarantees respect for customers' privacy rights and personal data protection.
- Training: all employees are required to complete mandatory training on privacy and data protection. In addition, specialised courses are held, designed to meet the training needs of specific departments within the bank. These training programmes are aimed at providing key knowledge and skills for the correct execution of procedures and treatments specific to each area, thus ensuring greater operational efficiency and compliance with internal and regulatory standards.
- Transparency: Bankinter Group guarantees that customers are duly informed about which data are processed, how they are processed and for what purpose, and the lawful basis that underpins such processing. Consequently, the Group complies with all the obligations of Regulation 2016/679 of the European Parliament and of the Council, of 27 April 2016, on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter, 'GDPR') and with all other data protection regulations currently in force or that affect the privacy rights approved in any of the states in which Bankinter Group operates. In 2025, Bankinter Group's Privacy Policy was updated again, along with the various data protection clauses, informing customers of these updates through multiple channels.
- IT security: Bankinter Group has all the necessary security measures in place to prevent system failure and/or unauthorised access by third parties to the data available.

### Customer Service area

In compliance with prevailing legislation, Bankinter has established a Customer Service Complaints and Claims Policy. This Policy defines the procedures and guidelines for managing customer complaints and claims. Its main objectives include ensuring adequate care and resolving complaints in the shortest possible time to increase customer

satisfaction. The commercial and professional honourability of the Customer Service area (SAC) personnel and their experience in financial activity is highlighted. The Policy addresses the management of complaints and claims, highlighting the need for appropriate follow-up to identify and mitigate risks related to customer satisfaction and the company's reputation. Opportunities to improve processes and services based on the feedback received are also mentioned.

The Policy applies to the main entities of Bankinter Group, while the rest of the subsidiaries have their own policies aligned with the same principles. The highest level of the organisation responsible for implementing the policy is the head of the Customer Service area (SAC), who must have commercial and professional integrity, as well as adequate knowledge and experience. It refers to various regulations and directives, including Order ECO/734/2004, Law 7/2017, and Order ECC/2502/2012, which govern the departments. The Policy is established with the interests of customers in mind, ensuring that their complaints and claims are handled fairly and efficiently. Customers are informed of the possibility of escalating to regulatory bodies such as the Bank of Spain, CNMV, or DGS if they are dissatisfied with the resolution or if a response is not provided within the regulatory timeframe.

It is available to stakeholders, including customers who may be affected and those who must contribute to its implementation.

The policy is developed with effective and transparent procedures for managing customer complaints, ensuring rapid and appropriate processing of the same, as well as the relevant registration of each complaint and the measures adopted for its resolution.

Bankinter makes the following information available to its customers both on the notice board available in all branches open to the public and on its website (bankinter.com):

- The existence of the Customer Service area, along with its contact details.
- The obligation to address and resolve complaints and claims submitted by customers, related to their legally recognised interests and rights, with the maximum response period being that established in the general regulations in force and, where applicable, in the specific regulations in force from the presentation of the claim or complaint.
- A Customer Service area Operating Regulation is also in place.
- In the event of a resolution that is unsatisfactory for the customer or disagreement with the outcome, information is provided on the possibility of referring the matter to the appropriate Complaints Service, depending on the subject concerned. Bank of Spain, CNMV or General Directorate of Insurance. Customers are informed that before approaching regulatory authorities, they must first submit their complaint to the Customer Service area.
- References to the regulations on transparency and protection of financial services customers.

Communications of the resolution of complaints or claims made by the Customer Service area will be sent by ordinary mail if the customer has arranged for communications to be sent by paper mail to Bankinter, or will be posted in the section relating to their communications on the website. In addition, regardless of the method of communication delivery, from the day after the resolution, the customer can access the letter via the website, as a copy will be generated and made available in the 'Webmail' section of the Bankinter website and, in the case of Bankintercard customers, in the 'My communications' section.

Additionally, a link providing easy access to the response provided by the Customer Service area will appear in the customer's global position. The customer can also find the response to their claim/complaint in the notifications section. The response is always stored in the Webmail and in the bank's systems for a period of 10 years.

If a customer's email is registered in their Data Model, the response letter is sent as an attachment via the entity's email.

In line with the provisions of Guideline 5 of the Guide on the management of complaints and claims for the securities and banking sectors of the joint committee of the European supervisory authorities (EBA, ESMA and EIOPA) and in section 3.1 of the Guide on the criteria for the organisation and operation of customer service areas of entities supervised by the Bank of Spain, the CSD must continuously analyse data on the management of complaints and claims in order to identify and address recurring or systemic problems and potential legal, operational and conduct risks.

In order to detect, process and resolve those issues that constitute the cause of the complaints received, the Customer Service area carries out various periodic controls, the details of which are described in the SAC internal procedure "processing of complaints and claims".

This data allows us to evaluate the operational efficiency of the service and detect opportunities for improvement to optimise response times and raise service standards.

#### Quality

The bank has a quality strategy, driven and coordinated by the Quality area, based on systematically asking and listening to customers to identify their needs and expectations, and implementing improvement plans as required based on their responses and feedback.

The bank works to improve response rates, the efficiency of survey delivery, and full adaptation to omnichannel approaches, enabling customers to provide their perception of the quality of the service received.

In addition, progress continues in analysing customer feedback to enable industrialisation that facilitates subsequent management. Advances have also been made in predictive quality by recalibrating the bank's Predictive Quality Model, incorporating new information sources and testing results. This model seeks to anticipate the perception of each customer in a personalised way, allowing a proactive approach to satisfy their individual needs.

Within this strategic framework, different action plans have been developed aimed at improving customer satisfaction, which translates into a better NPS (Net Promoter Score).

One of the main focuses is updating company contacts in the system, ensuring that information is always accurate and up to date. In addition, strategies are being implemented to increase the percentage of responses to surveys, which will allow for greater statistical representation and a more precise view of customer satisfaction.

Regarding training, efforts are being made to enhance the training of the sales network and companies to highlight the importance of the NPS as a key tool for assessing the Bank's quality and promoting its continuous improvement. Specific action plans have also been designed for branches and centres, which show areas of opportunity in their results. For example, in 2025, work was carried out with 71 branches, of which 52% improved their results compared to 2024. Similarly, measures were implemented in 8 corporate centres, 63% of which improved, and in 13 private banking centres, 62% improved.

A detailed analysis of the results is also conducted by segmenting specific areas such as Retail Banking, Wealth Management, Corporate & SME Banking, and Large Corporates. This level of segmentation allows for more precise identification of areas with lower performance and the design of improvement plans tailored to each segment. Finally, continuous monitoring of quality and satisfaction indicators is carried out to evaluate the effectiveness of the actions implemented, ensuring that the necessary adjustments are made to maintain a constant improvement in NPS results.

Detailed reports are then produced summarising the main findings, including graphs, tables and explanatory comments. These reports are shared with the different areas of the Bank through internal platforms, such as the intranet, ensuring that the responsible teams have access to the relevant information.

Communication of results is carried out through meetings and presentations aimed at the teams and departments involved, in which findings are discussed and corrective actions are planned. In addition, specific feedback is sent to the services involved to help them identify specific areas for improvement.

Finally, action measures derived from the results include changes in processes, training for employees and adjustments in customer service strategies. These measures are continuously monitored through key quality and satisfaction indicators, with periodic surveys scheduled to evaluate their effectiveness and collect new opinions that drive constant improvements.

The operational manager of these surveys is the head of Quality at Bankinter, who will submit the results to the Management Team on a monthly basis and to the executive committee of the Bank on an annual basis.

Bankinter uses three different suppliers to carry out these surveys, who are responsible for different business segments. In addition, a specific tool is used to measure the quality of digital assets, allowing specific surveys to be carried out to evaluate the customer experience at different points of their interaction with the Bank's digital assets. The team in charge of the comprehensive management of the surveys is the Quality department, which

uses the Medalia platform to monitor all the information on surveys, including both scores and comments received, which are categorised by area and managed with the help of AI.

In addition, the Quality area, together with other areas of the Bank, draws up a Commercial Protocol that establishes the behavioural guidelines for our relationship with our current and potential customers. This protocol impacts the management of IROs related to customer service.

The Commercial Protocol organises the commercial relationship in three different phases: Contact, Explanation and Commercial Action, defining the priorities and behaviours required at each stage.

The Contact phase marks the beginning of the relationship with the customer, where the aim is to establish a favourable climate for the development of future interaction. At this stage, aspects such as cordiality, personalised attention and dedication of quality time are considered essential to create a foundation of trust.

In the Explanation phase, the focus is on identifying the customer's economic and financial needs through an exploration process and subsequently offering clear and detailed information about the available products and services. This phase prioritises that the customer fully understands the options offered, presenting attractive and differentiating alternatives that align with their needs. During this phase, principles of agility and integrity are applied to ensure effective interaction.

Finally, in the Commercial Action phase, the aim is to successfully conclude the commercial action and establish a link that allows the customer's needs to be monitored, ensuring the continuity of the relationship and the possibility of offering them new products and services in the future.

Compliance with this protocol is assessed semi-annually in all universal offices of the network using the Mystery Shopping technique, carried out by external auditors. This procedure allows verification of the degree of compliance with established guidelines and provides an objective quality indicator that is compared with financial sector standards.

All companies and subsidiaries that form part of the Group have similar operating and management mechanisms. However, each of these processes has been adapted to respond to the particularities of each region in which they operate, taking into account geographical, regulatory and cultural factors that may influence their implementation.

In line with the Bank's commitment to continuous improvement in customer satisfaction, NPS remains one of the main benchmark indicators. In recent years, the trend has been one of sustained growth, reflecting an increasingly positive perception by customers. In Spain, the NPS was 43.6% in 2022, rising to 46.3% in 2023, 49% in 2024, and reaching 51.4% in 2025. This progress demonstrates the effectiveness of the initiatives implemented to strengthen the customer experience and reaffirms the Bank's commitment to service excellence.

## Cybersecurity

Bankinter Group has a regulatory framework governed by Bankinter Group's Security and Business Continuity policies, to guarantee the security of information and the continuity of the Bank's operations in the event of possible disruptive incidents. Its objectives include protecting employees, customers and the brand, ensuring the confidentiality, integrity and availability of information, as well as maintaining critical services at acceptable levels during contingencies.

The policy applies to all areas, activities and phases of the Bank's value chain, covering both internal and external aspects (including critical suppliers) and is designed to adapt to the specific needs of the organisation.

The ultimate responsibility for its implementation lies with the Bank's management, which supports its execution through two management systems certified according to international standards: ISO/IEC 27001 (information security) and ISO 22301 (business continuity), whose certifications were renewed in 2025, offering an external guarantee in the execution of projects and the development of processes. Additionally, in 2025, the bank obtained ISO 27017 certification for information security in cloud services.

The Bank is committed to complying with legal, contractual and industry regulations, including recognised international standards. It also takes into account the interests of stakeholders, such as customers, staff and partners, when designing and implementing the policy.

Finally, Bankinter disseminates the Policy through internal and external channels, ensuring that relevant stakeholders are informed and participate in its implementation. Continuous improvement is ensured through audits, reviews and regular training.

Digital security is one of Bankinter's top priorities, as demonstrated year after year by the increase in budget and staff dedicated to this area. The purpose is to ensure a high level of confidentiality, integrity and availability to customers.

Digital security is a true business driver that contributes to the bank's mission of offering quality financial services. These commitments are set out in the Digital Security Master Plan, which made important contributions to security projects and internal processes in its third year in force. These included the increasing maturity of business continuity plans and protection against threats such as distributed denial of service attacks (DDoS) and ransomware.

The use of the NIST Cybersecurity Framework (a framework for protection against threats and risks) makes it possible to measure the level of maturity of compensatory controls or countermeasures and minimise risk to the Bank. In 2025, a much broader, more ambitious, and more demanding global framework was achieved.

Security reviews were also performed on the bank's suppliers, using a methodology based on the European Banking Authority (EBA) guidelines.

In relation to the European DORA Regulation, all Bankinter Group subsidiaries are complying with the objectives and requirements established for digital operational resilience. In the

world of cybersecurity, compensatory measures for detection, prevention, protection and recovery have been deployed. At the same time, maturity was improved in the management of identities, passwords, additional authentication methods, etc.

The area's activity was completed with the development of awareness plans for users, who are the weakest link in the security chain.

- Cybersecurity Training

The Bank runs online training programmes for workers via the intranet and simulations are run to check how confidential information (passwords, identification data, etc.) can be inadvertently disclosed via e-mail, text messages (smishing), phone calls (vishing), etc. Some of these exercises, expanded in 2024 to include baiting (USB) and social engineering (QR codes), continued during 2025.

In addition, in 2025, senior management participated in role-play exercises to analyse decision-making and evaluate leadership reaction in cybersecurity scenarios, using technologies such as artificial intelligence to highlight risks from misuse, including fraud, identity theft, and reputational damage.

The awareness-raising work also extended to external staff, with direct initiatives for Bankinter customers and non-customers. In this sense, a specific web portal was created where you can take a course with an immersive experience, listen to podcasts, read news, books, manuals, etc.

- Cyber Intelligence: anticipating problems

The cyber intelligence service has been consolidated to obtain early and preventive information on threats such as stolen customer credentials, compromised credit card numbers, brand abuse, etc.

This service provides additional visibility into what is happening outside our borders, which, together with the internal information reported to management through performance and risk indicators, allows for the construction of a global picture that helps with the early and proactive management of threats and risks.

To unify all the necessary information for proper management, the strategic Modern SOC (Security Operation Center) project operates 24/7.

These security operations centres are highly specialised and have expert professionals at different levels of support and analysis, which guarantees constant knowledge and an appropriate response to incidents worldwide and with a comprehensive service.

## Accessibility

As a framework for action in the management of Universal Accessibility, Bankinter Group has established an Accessibility Policy, the main objective of which is to guarantee equal opportunities and non-discrimination of people, identifying accessibility as one of the basic pillars to meet the expectations of our stakeholders, in order to offer an adapted, inclusive and quality service.

This policy was approved by the sustainability committee, body responsible for its validation and by the board of directors, to which said committee reports.

The policy, applicable across the entire Bankinter Group, is available to all relevant stakeholders who may be affected and to those required to contribute to its implementation, via Bankinter's corporate website.

The policy refers to Spanish and European accessibility regulations for financial institutions in force at the time of its approval, as well as the main UNE accessibility standards. Furthermore, the commitments contained in internationally recognised protocols and standards, such as the Universal Declaration of Human Rights, the Convention on the Rights of Persons with Disabilities and the principles of the Global Compact, are included.

It aims to improve inclusion and customer satisfaction while ensuring compliance with applicable legal requirements. It also identifies and addresses risks associated with potential non-compliance with accessibility requirements, which could lead to the exclusion of people with disabilities. In its development, the interests of key stakeholders were considered, including customers with disabilities and staff responsible for designing, developing, and maintaining digital content.

A Human Rights Policy has also been established, in accordance with the UN Guiding Principles on Business and Human Rights, which includes, among other commitments, the establishment of a balanced, transparent and clear relationship with customers, and the facilitation of the financial integration of people with disabilities, ensuring their access to the Group's products and services on equal terms. In this regard and as reported by the ethics and business conduct committee, no cases of human rights violations have been reported.

In 2025, Bankinter made significant progress in integrating accessibility into its services and processes, consolidating its commitment to an inclusive experience for all customers. The main initiatives developed include:

#### 1. Physical accessibility

- Adaptation of branches and physical spaces: In 2025, a thorough analysis was conducted to identify improvements needed to ensure accessibility in the Group's physical environments, ensuring compliance with the prevailing legislation and universal accessibility principles. This work included interventions in Bankinter branches in Spain and Portugal, aimed at improving the inclusive experience for all individuals. As part of this objective, in Spain, Bankinter has a Universal Accessibility Management System (SGAU) certified under UNE 170001. This system establishes procedures to meet legal requirements and the needs of customers and employees, ensuring barrier-free physical and digital environments. The SGAU is based on principles such as:
  - DALCO (mobility, grasping, localisation, and communication), which guides the design of accessible spaces.
  - User focus, to anticipate and exceed expectations.
  - Leadership and participation, involving management and all staff in continuous improvement.

In 2025, UNE 170001 certification was renewed, consolidating the commitment to accessible environments in certified branches.

- ATMs and Payment Terminals: improvements were made to text contrast and size on ATMs, as well as audio functionality. Point-of-sale terminals are being gradually replaced with more accessible devices.

#### 2. Digital accessibility:

- Digital Channels: comprehensive audits of Bankinter Group's digital channels were carried out, with corresponding remediation measures implemented to ensure compliance with the accessibility levels required by applicable regulations in each jurisdiction.
- Automatic auditing tools have been deployed to continuously evaluate and correct accessibility levels on digital portals.
- Specialised training and internal guides have been provided to development teams to ensure new projects incorporate accessibility criteria from design onwards.
- Proactive actions on websites and apps include navigation improvements, contrast adjustments, alternative text, compatibility with assistive technologies, and reviewing signature processes for enhancements.
- Conversion of documents into accessible formats has begun, a process that will continue in 2026 due to its volume and technical complexity.

#### 3. Cognitive accessibility

- Language in contracts and key documents has been adapted, beginning the simplification of texts to ensure comprehension.
- Accessibility guidelines have been integrated to provide preferential and personalised customer service, prioritising those most frequently used by customers with special needs. To this end, the following initiatives have been developed:
  - Registry of customers with special needs, to anticipate barriers and adapt critical processes such as contract signing, biometric identification, and secure operations.
  - Mandatory training for front-line staff, including protocols for providing inclusive service.
- Promotion of financial education for vulnerable groups through various programmes. Notable examples include the Moneytown digital platform, which teaches children to manage money in a playful way; Game of Traders, an online introduction to the stock market aimed at university students; and various online finance courses for young people. In addition, the bank promotes a corporate volunteering programme in which employees provide financial education to schoolchildren, older people, people at risk of social exclusion and people with disabilities. Almost ten thousand people in Spain and Portugal have benefited from

all these financial education programmes. Likewise, team-building activities are organised together with social organisations dedicated to the inclusion of people with disabilities, thus raising employee awareness. A total of 1,452 employees in Spain and Portugal (22% of the workforce) have participated in all these activities.

These measures reinforce Bankinter's strategy to remove physical, digital and cognitive barriers, ensuring a universal and inclusive experience at all points of contact.

#### Commercial transparency

Bankinter's Commercial Communication Policy focuses on ensuring that all commercial communications of banking and investment products and services are clear, truthful and transparent. The general objectives include ensuring customer confidence and complying with current regulations. The Policy addresses risks such as misinformation and opportunities to improve the relationship with customers. The monitoring process includes internal audits and periodic reviews to ensure compliance.

The scope of the Policy covers all of Bankinter's commercial activities, including the development and promotion phases of products and services. It affects all stakeholder groups, including customers, staff and regulators.

The highest level of the organisation responsible for applying the Policy is the Bankinter board of directors, which oversees its implementation and compliance.

Bankinter is committed to respecting third-party rules and standards, such as the guidelines of the National Securities Market Commission (CNMV) and other relevant regulations.

In developing the Policy, particular attention is paid to the interests of key stakeholders, ensuring that their needs and expectations are considered.

The Policy is made available to interested parties through the Bankinter website and other communication channels, ensuring that stakeholders can access it and contribute to its implementation.

Through the Communication Policy, published and reviewed annually, the general principles of conduct that Bankinter and the entities of Bankinter Group must follow in their commercial communications on banking products and services are established.

This policy applies to Bankinter, S.A., without prejudice to the existence of specific policies derived from it in the Group's other subsidiaries.

- Campaign and Advertising Control System

As a mitigation mechanism for material risk, Bankinter has a structured control system for the review of all campaigns and advertising material, ensuring their compliance with current regulations. In this process, all material undergoes a prior review by self-control, as mentioned above.

In accordance with the principles of control based on three lines of defence, the Marketing, Communication and Social Networks areas are primarily responsible for ensuring compliance with this policy and related procedures. These areas may be supported by external controls, such as those provided by self-control, as set out in the relevant sections of the policy.

The second and third lines of control (Regulatory Compliance, Risk Control and Internal Audit) are responsible for verifying the effectiveness of the first level controls, ensuring compliance with advertising regulations and ensuring the proper implementation of this policy and its internal procedures.

Autocontrol process.

The review process through Autocontrol is carried out as follows:

1. The advertising piece is sent to the self-control mailbox.
2. Autocontrol redistributes the request internally to the corresponding specialist.
3. They respond within a standard period of 3 business days or 5 business days in the case of complex products such as equities, funds or investments.
4. There is an express review option (response in 1 working day) at an additional cost.
5. If the answer is positive, the piece is approved for distribution. If the answer is negative, the necessary modifications are made and the request is sent again, receiving a response within an additional period of 2 business days.

Finally, all communications aimed at customers and the approval or positive COPY report are filed in the commercial communications register, ensuring compliance with established regulatory and quality standards.

In 2025, all advertising pieces have been reviewed by Autocontrol, which demonstrates the effectiveness of the actions implemented by the marketing area to guarantee responsible advertising.

### 13.4.2. Governance

The **Group's board of directors** is responsible for approving the Company's general policies and strategies. It is also responsible, directly or through its committees, for monitoring their implementation, including the sustainability strategy and policy and the other policies developed under its sphere of action.

In 2025, the board of directors approved an update to the sustainability policy, which sets out guidelines for Bankinter Group to integrate responsible management values and principles into its activity, so it can contribute to the prosperity of society and sustainable development.

The **sustainability and appointments committee**, composed of five board members, is the body responsible for reviewing the Sustainability Policy, monitoring the strategy and supervising the performance of the Group's ESG (Environmental, Social and Governance) indicators, monitoring the dialogue with stakeholders, assessing ESG risks and ensuring the public dissemination of non-financial and diversity information.

Likewise, there are internal bodies created within the Bank to transfer, to the whole organisation and its Group, the principles and guidelines that the board and its committees dictate in terms of sustainability, creating a solid, efficient and fully coordinated system for sustainability management:

- The **sustainability committee** takes on the role of coordinating sustainability within the Bank and is responsible for preparing the proposal for the multi-annual strategic sustainability plans and promoting, within Bankinter Group, compliance with the principles contained in Bankinter Group Sustainability Policy, approved by the board of directors, as well as the objectives of the strategic sustainability plans in force at any given time.

The committee is chaired by the Non-executive Chair of the board and is made up of those responsible for the key areas for the integration of ESG criteria in decision-making throughout the Group's value chain.

- The **Sustainability division** is responsible for ensuring the effective performance of the actions defined in the lines and programmes of the multi-year strategic plans. It also acts as an observatory of trends and risks based on ongoing dialogue with stakeholders and promotes coordinated action among the areas to develop initiatives focused on meeting their expectations. It is also responsible for monitoring and verifying the alignment of the Bank's different divisions, subsidiaries and branches, as well as monitoring and verifying the degree of compliance with the objectives set out in the strategic plan, reporting periodically to the sustainability and appointments committee and to the sustainability committee. It also identifies areas for improvement, according to internationally recognised standards, norms, guides and ethics and sustainability indexes. It is also responsible for the preparation of the different sustainability accountability reports for the various regulators and competent bodies and other stakeholders, as well as the information required by investors and sustainability analysts.

The Sustainability division is committed to positioning the Bank and its Group as leaders in sustainability and social responsibility.

Given the Bank's activity, the Sustainability division participates internally in the units responsible for evaluating and promoting the financing and issuance of green financial instruments.

At Bankinter Group, the material impacts, risks and opportunities (IROs) detected through the double materiality analysis are integrated into the strategic lines of the DNA Sustainability Plan.

Regarding the supervision of the IROs by the board of directors, the Sustainability Plan, which includes the identified IROs, is periodically presented to the sustainability and appointments committee. At these meetings, information is provided on the progress of initiatives, progress in the application of due diligence and the results obtained in relation to policies, actions, parameters and goals.

With respect to the integration of IROs into risk strategy and management, these form part of Bankinter Group's risk strategy and management, and are aligned with the strategic lines

of the Sustainability Plan. Their impact is analysed in the regular sessions of the sustainability and appointments committee, which monitors how these issues influence corporate strategy, decision-making and the risk management process, ensuring their alignment with the bank's strategic objectives.

Lastly, as regards the matters addressed during the reporting period, the sustainability and appointments committee dealt in four sessions with various issues relating to the material IROs included in Bankinter Group's Sustainability Plan, ensuring their proper supervision and integration into the Bank's strategy.

Below is a more detailed description of certain activities and scopes that may have implications for social risks, which complement the information already included on each of the implemented policies defined in the previous point:

#### Community relations activities:

Although this is not a matter identified as material for Bankinter Group, Bankinter continues to collaborate with local communities. In 2022, the sustainability committee approved the Group's Social Action Strategy, which establishes the framework for action of Bankinter Group's entities in the process of requesting, assessing, deciding, controlling, monitoring and measuring all of Bankinter's contributions in the social sphere. This is fully compatible with the Sustainability Policy approved by the board of directors. In particular, it also complies with principle eight, which governs contributions to boost social development in the communities where an bank operates, both through its own business operations and through initiatives focussed around social investment, through Bankinter Innovation Foundation, partnerships with the non-profit sector and the corporate volunteering programme.

Bankinter Group's Social Action strategy aims to maximise the contribution of Bankinter Group's Social Action to the Sustainable Development Goals (SDGs), by helping to improve the society where the Group operates, increase employee and stakeholder satisfaction, increase recognition and boost Bankinter's reputation and brand.

#### Employee relations and employment standards:

As mentioned earlier, Bankinter's main commitment in this area is to maintain employment not only quantitatively but also qualitatively.

The bank's Sustainability Plan incorporates the Differentiation strategic line, which includes advanced people management, establishing lines of work, objectives and indicators for creating quality employment, complying with relevant standards and initiatives.

These programmes are monitored by the sustainability committee and the sustainability and appointments committee, as part of the monitoring of the development of the Sustainability Plan.

### Customer protection and product responsibility:

In this case, strategic lines such as customer relations have also been integrated into the Differentiation pillar. As in the previous cases, as they are included in the Sustainability Plan, the responsibility for their implementation and monitoring lies with the sustainability committee and the sustainability and appointments committee.

Bankinter also has strict systems and policies in place to ensure regulatory compliance and the prevention of corruption and money laundering in its relations with its main stakeholders, identifying potential short, medium and long-term risks and establishing policies and procedures to mitigate them, such as its Codes of Ethics and Conduct (for employees, suppliers and agents), Anti-Corruption policies and Anti-Money Laundering policies, all of which are included in the Sustainability Plan's Responsible Action pillar.

Bankinter also has the following bodies:

- The regulatory compliance committee. It is the Senior Management body that monitors the Bank's policies in this area in accordance with the statute of the Regulatory Compliance function. The committee implements the policies in relation to the regulatory and regulatory compliance matters established by the board of directors' risk and compliance committee.
- The product and operational risk committee. This committee approves the launch, modification, monitoring and cancellation of products and services offered to customers. It is the body to which information on the bank's operating and operational risk is reported.
- The internal control body. The internal control body is responsible for establishing and ensuring compliance with the policies and procedures for preventing money laundering and terrorist financing, in accordance with Law 10/2010 and other applicable regulations, which constitute the preventive framework of Bankinter Group.

In addition, to support the board's oversight function, other specialised committees have been established, made up of Senior Management, in which the Compliance Division participates to ensure effective and homogeneous risk management, such as the crime prevention and professional ethics committee. In addition, the company participates in the corporate risk map monitoring committee, the credit risk models committee, the data management operations committee, the technological risk coordination committee, the information security and business continuity committee and the outsourcing committee.

### Human rights

The bank's activities are governed by a Human Rights Policy that reflects its commitment to respecting, supporting and protecting human rights in the development of its activity and in its relationship with stakeholders within the environment in which it operates: employees, customers, suppliers and other commercial partners; all under the UN motto: "protect, respect and remedy". This policy is complemented by other policies, such as the corresponding Diversity, Accessibility policies and the Equal Opportunities Plan, all of which are included in the Sustainability Plan's Responsible Action pillar.

The sustainability committee is responsible for approving the policy and monitoring the degree of compliance with its principles. The committee's members have received training in the application of human rights in business activities.

The Group has accepted the obligations defined in internationally recognised protocols and standards, including the Universal Declaration of Human Rights, the Guiding Principles on Business and Human Rights, the Ten Principles of the United Nations Global Compact, and the Equator Principles.

Bankinter complies fully with the provisions of the key conventions of the International Labour Organization (ILO) with regard to respecting freedom of association and the right to collective bargaining, as well as with the Spanish Constitution, the Organic Law on the Freedom to Form a Trade Union, the Workers' Statute and applicable collective bargaining agreements in all the countries where it operates.

Bankinter involves its partners and third parties in the principles of this policy, and in similar frameworks and principles.

This policy applies to all the Group's activities. Bankinter Group requires its partners and third parties to accept the content of this policy or to abide by comparable rules of conduct and values.

### Alignment of remuneration policy with environmental and social risk objectives

Bankinter Group's remuneration policy is designed to be coherently aligned with ESG (Environmental, Social and Governance) objectives. This alignment seeks to incentivise behaviours and outcomes that generate long-term sustainable value, ensuring that the incentives provided for in the remuneration system adequately consider the risks related to sustainability, capital, liquidity and the timing of benefits.

To ensure this alignment, Bankinter Group's remuneration policy includes variable components linked to performance on ESG criteria. This translates into the evaluation of managers and staff not only for their financial results, but also for their contribution to the achievement of the Group's environmental, social and governance objectives. In this way, a corporate culture is fostered that values and rewards responsible and sustainable practices.

Furthermore, as previously indicated, the remuneration committee continuously reviews these policies to ensure they adapt to changes in the Group's strategy and market conditions, as well as to assess their effectiveness in promoting proper risk control and management. This review includes an assessment of whether the remuneration policy contributes to the creation of long-term value and whether it is aligned with international best practices in sustainability.

Taken together, these measures ensure that Bankinter Group's remuneration policy not only promotes financial success but also reinforces the Group's commitment to sustainability and social responsibility, aligning incentives and remuneration practices with the ESG objectives established by the Institution.

The variable remuneration of Executive Directors, as well as key personnel, is determined through the application of highly demanding indicators, fully aligned with the Group's risk profile, and which are fundamental to its long-term sustainability.

To do this, the calculation of variable remuneration is carried out in three phases:

- **First phase:** achievement of the annual and multi-year goals is assessed based on the indicators established for each case.
- **Second phase:** the variable remuneration calculated based on the above indicators is adjusted by the risk appetite framework (hereinafter, "RAF") indicators aligned with metrics that adequately reflect the most significant risks, including ESG risks.

These indicators affect 100% of the accrued variable remuneration and may even reduce it to zero, but never increase it.

Bankinter Group currently relies on six RAF indicators, two of which are related to environmental and social targets: Emissions financed (which measures the impact on decarbonising the economy through the financing granted by the bank to its customers), and the Institution's total NPS (*Net Promoter Score*) based on quality surveys (which measures the customers' willingness to recommend the Institution).

Each indicator has a defined objective, tolerance and limit that are approved by the board of directors at the proposal of the risk and compliance committee. Each indicator is measured quarterly, so there are four measurements per year for each indicator. Non-compliance with the tolerance and limit levels will result in a penalty being applied to the accrued variable remuneration, and may even adjust it to zero.

- **Third phase:** variable remuneration is adjusted according to ROE TTC<sup>9</sup>, following the scale determined by the board of directors, on the proposal of the risk and compliance committee, with the objective of creating long-term value and developing the Institution and its Group sustainably over the coming years, aligned with shareholders' interests.

These three stages apply to both annual variable remuneration and multi-year variable remuneration. The second and third stages involve ex ante adjustments.

Further information is available in the directors' remuneration policy and remuneration report, which are available on the corporate website.

### 13.4.3. Risk management

Bankinter has established its social risk management policies and tools in accordance with the main international initiatives and commitments to which it is a party.

The above sections on Business Strategy, Processes and Governance describe the relationship of impacts, risks and opportunities with the social standards detected during the double materiality analysis, as well as the policies implemented and the procedures required to manage them, including how such policies and procedures are governed.

All processes associated with the workforce, policy, channels and employee impact management and those related to customers have been described in depth, as mentioned above, following the same structure and specifically mentioning how identified risks are managed, such as: reputational risk due to failure to meet customer expectations in relation to products and services, security in the protection of customers' financial and/or personal data and operational risk due to cyber attacks that may compromise business continuity.

In addition, Bankinter Group has other policies and mechanisms in place to manage the potential social risks in its relationship with stakeholders. These are described below:

- **Adherence to international standards** of responsible management and social and environmental impact in its operations, such as: the UN's Global Compact, the UNEPFI Principles for Responsible Banking and the Equator Principles.
- The **Sustainability Principles** of sustainable finance integrated in the Risk Framework Agreement and the derived sector guides relate to financing in sectors that are particularly controversial or risky, and whose social and environmental impact may be significant. The main recommendations that the Bank has followed in establishing these principles can be found in the Equator Principles, the United Nations Global Compact, the Universal Declaration of Human Rights, the ILO Core Conventions, etc. The analysis of operations in these sectors under these principles is the responsibility of the Risk and Sustainability departments, which require a positive report according to the criteria of these principles in order to proceed with the operation.
- The **ESG guidelines** for the Defence, Extractive, Energy and Agricultural sectors, which incorporate the environment and social criteria that the bank must comply with in its financial operations in these sectors.
- **General Exclusion Criteria** in investment decisions and advisory services. These criteria apply to Bankinter, S.A., and Bankinter Group companies engaged in the following reserved activities: the management and administration of collective investment schemes and pension funds, discretionary book management, and investment advisory. The objective is to avoid investing in companies whose business is fully or partially associated with the so-called "controversial activities". These activities are characterised by generating a high negative impact in environmental or social terms due to the resources they consume, the waste they generate, the impact of the goods or services they produce on the environment or on society and/or the bad practices they apply in the management of their human resources.

<sup>9</sup>ROE TTC (through the cycle), return on invested capital: A metric designed to evaluate the Bank's medium- to long-term profitability, isolating the cyclical component introduced into the income statement by the cost of risk, as well as other extraordinary results which, while they should be considered part of the Institution's historical profitability, constitute isolated and unique events that are not used as a reference in a forward-looking assessment of profitability.

- Bankinter Group's **Policy on Integration of Sustainability Risks** in investment and advisory decision-making, which has been updated, expanding its scope of application. This policy establishes the principles, scope, and governance framework that govern the integration of relevant, material, or potentially material sustainability risks into investment processes and advisory on savings and investment products, with the objective of improving transparency and information provided to end investors. The policy aims to develop investment activity responsibly and encourage customers to progress towards a transition aligned with future challenges and sustainable development, describing how sustainability risks are integrated into decision-making processes.
- **Reputational risk** is the risk arising when the expectations of stakeholders, i.e. customers, shareholders, employees and investors, are not met and their reactions can adversely affect existing or new business relationships. They are unique because they depend on external assessments and can originate from a wide variety of sources, including other risks and social, economic or sector conditions.

The reputational risk management model involves preventing such risks, identifying and controlling them proactively to reduce their probability of occurrence and mitigate their impact. The bank has various tools at its disposal for this:

- Regular measurement of the perception and expectations of the main stakeholders (internal climate, reputation and customer satisfaction surveys, analyst ratings, etc.).
- Monitoring and analysis of mentions of the bank in conventional and social media, in addition to active listening to gauge trends in the market and environment.
- Assessment of reputational risk before marketing a product, outsourcing a service or partnering with a third party.
- The reputational risk map, which includes a catalogue of 33 possible events related to products and services, conduct, finances, leadership, innovation, employment aspects, sustainability and image. All of these are associated with performance and impact indicators, and control mechanisms.
- Crisis management protocol to preserve reputation and business continuity.
- Employee training and awareness-raising within the bank to reinforce a preventive culture.
- Reporting to the governing bodies.

- As mentioned in the section on environmental risk management, Bankinter Group has developed its **Sustainable Financing Classification Criteria (SFCC)**, which regulate the procedures and criteria that a financing operation must meet to be classified and labelled as "Sustainable". These criteria ensure a homogeneous and standardised methodology for the entire Group, allowing the correct identification and disclosure of financial products and services related to sustainability. The policy applies to all Bankinter Group financing operations, without specific exclusions.

The SFCC will be reviewed and updated periodically to reflect developments in applicable regulations, market sustainability criteria and Bankinter Group's own activities. Modifications to the SFCC will be approved by the product committee, at the proposal of the Sustainable Labelling Unit or of the product committee itself or one of its members. Bankinter's governance framework consists of a dual organisational structure that serves to analyse, supervise and approve the sustainable environment.

- The **product committee** is responsible for approving the SFCC and their development documents, as well as new products that Bankinter considers eligible as sustainable at any given time, in accordance with the regulatory environment and applicable market practices.
- The **Sustainable Labelling Unit (SLU)**, made up of a multidisciplinary team, is responsible, among other functions, for approving sustainable labels for Bankinter's non-standard operations and the subsidiaries identified in the SLU regulation. Bankinter's branch in Portugal will have its own sustainable marking unit.

## 13.5. Governance risk

### 13.5.1. Governance and risk management

Bankinter has a strong commitment to sustainability; i.e. responsible performance in all its areas of operations. In the area of internal governance, this results in a robust corporate governance model underpinned by a board and board committees with the right size and composition to ensure: diversity and effectiveness; sound internal decision-making processes; and a clear corporate structure, with well-defined lines of responsibility to guarantee that risks are properly identified, assessed and managed in all of the regions in which it operates.

Under the leadership and oversight of the board of directors, this model serves the essential objective of creating long-term value for all stakeholders: shareholders, customers, employees and society as a whole.

The board of directors has a size favouring effectiveness, where all directors may participate and decision-making is agile, and a structure that reflects the existing proportion between the company's capital, represented by the proprietary directors, and the rest of the capital. Bankinter has 58.3% independent directors, thus complying with national and international recommendations and best practices.

With regard to gender diversity, the distribution between men and women on the board stands at 58% women (7) and 42% men (5), exceeding the targets set both by Bankinter and by national and international recommendations and best practices.

Furthermore, Bankinter continues to be the only IBEX 35 company with two women in the Institution's most senior governance and executive positions (non-executive chairwoman of the board of directors and chief executive officer). The other female directors (five) are independent external directors.

As regards diversity of knowledge, skills and experience, both nationally and internationally, the board of directors as a whole brings together sufficient and appropriate expertise to cover all areas of knowledge necessary to properly understand the development of the Group's activities, including its main risks, and to ensure the effective capacity of the board of directors to take decisions independently and autonomously in the best interests of the Group. This has been further strengthened following the appointment of the two new members, particularly in technological and digital matters.

It is important to note that the collective suitability of the board of directors for overall risk management, given its diversity, must be assessed using objective criteria, prioritising those risks particularly related to the core activity of the Institution and its Group. However, there are emerging risks, such as climate or geopolitical risks, which, although not specific to the activity of Bankinter Group, may, due to their cross-cutting nature, affect multiple aspects of the business. These risks require a global vision and collective capacity to understand by the board as a whole that ensures, through the diversity of perspectives and experience of the directors, that the board of directors can effectively and efficiently confront the complex and multi-faceted challenges that these universal risks present.

The members of Bankinter's board of directors have experience in identifying, assessing and managing risks within their respective areas of responsibility, and collectively possess an understanding of how all types of risks may impact the operations of the Institution and its Group, its customers and the market, and are therefore in a position to understand and oversee emerging risks as well.

The Annual Corporate Governance Report and the corporate website set out in detail the knowledge and experience of the members of Bankinter's board of directors, both individually and collectively, demonstrating that the composition of Bankinter's board of directors fully meets diversity objectives and maintains a completely balanced structure in all areas.

Bankinter uses a systematic approach to identify material incidents, risks and opportunities related to business conduct. This process considers key criteria such as location, analysing the incidents and risks in all jurisdictions where the Bank operates, with special attention to those markets with more demanding regulations or greater inherent risks in terms of governance and compliance. The nature of the bank's activities, such as financial operations, supplier relationships and customer services, is also taken into account, assessing the potential impact on the transparency and integrity of the organisation.

In addition, the specific risks of the financial sector are addressed, including exposure to cases of corruption, money laundering or conflicts of interest, for which mitigation strategies are applied based on the strict application of the Ethics and Conduct Code and the Anti-Corruption Policy.

In this way, the Bank integrates these dimensions into a continuous assessment model that identifies opportunities to strengthen a responsible and honest corporate culture, mitigate risks through internal policies and specialised training programmes and ensure regulatory compliance at all levels of the organisation.

In the analysis of double materiality, which has been mentioned throughout this chapter, 4 impacts related to governance were detected:

- Promotion of a responsible and upright corporate culture derived from good governance actions that are framed within the principles of the Sustainability Policy.
- Reinforcement of the fight against corruption and improvement of integrity in the supply chain derived from the implementation of and compliance with the Supplier Code of Conduct and the incorporation of governance criteria in its evaluation and approval
- Strengthening the culture of transparency and integrity within the Bank due to the strict application of the Anti-Corruption Policy, ethics and conduct code, etc, which includes labour and contractual sanctions for non-compliance and the possibility of mitigating responsibilities.
- Strengthening the capabilities of senior management through specialised ESG training that improves monitoring of ESG aspects within the organisation.

### Business conduct

Bankinter has zero-tolerance policy toward crime, having adopted all measures necessary to convey this commitment and the obligation to prevent, detect and persecute crime in all its forms and to the full extent at all levels of the Bank's structure.

On 21 October 2015, the board of directors of Bankinter, S.A., in accordance with the reform of the Criminal Code approved by Organic Law 1/2015, of 30 March, which entered into force on 1 July 2015, approved the creation of the crime prevention and professional ethics committee, which is responsible for overseeing the functioning and compliance of the criminal risk prevention model and has autonomous powers of initiative and control.

The regulations establishing the powers and functions of the committee have been updated regarding the Criminal Compliance systems at Bankinter Consumer Finance and Luxembourg, for proper harmonisation and integration with the Bank's system, being presented to the audit and compliance committee and approved by the board of directors.

The Chairwoman of the crime prevention and professional ethics committee reports annually and directly to the audit committee, reporting to the board of directors.

Similarly, Bankinter has implemented the General Criminal Compliance Model Report, which carries procedural effects and has been certified by an external expert. Its conclusions state that it complies with the requirements established by the current Criminal Code: it adequately identifies the risks of criminal liability, has the necessary tools, has a complete internal control structure, has the necessary resources, pays attention to the ongoing training of its staff and is subject to continuous review and improvement.

One of the most important corporate values of Bankinter Group is compliance by all employees with the most demanding standards of ethics and professional responsibility.

The People Management area is responsible for the correct dissemination and communication of the obligations of the Ethics and Conduct Code. Therefore,

- all new additions to the Group receive and sign that they have received the Code of Professional Ethics.
- periodically, at least once a year, publications are posted on the intranet to remind all employees of its main features and including a link to it.

Regarding staff training, during 2025 courses on criminal compliance and ethics and conduct codes were provided to new hires across all Group companies.

In addition, criminal compliance training is provided to new recruits, both Bankinter's employees and members of the governing bodies. Likewise, new staff members are given introductory information at welcome days, emphasising the importance of corporate culture and values, the mandatory reading and signing of the Code of Professional Ethics and the completion of the mandatory Criminal Compliance course.

Bankinter's board of directors plays a key role in overseeing and promoting a culture of ethical and responsible business conduct, ensuring that the bank's policies and procedures reflect the highest standards of integrity, transparency and regulatory compliance. Through the sustainability and appointments committee and the audit committee, the board oversees the application of internal regulations on business ethics, prevention of conduct risks and regulatory compliance.

As part of this commitment, the board receives specialised training in aspects related to business conduct, which strengthens its capacity for monitoring and making informed decisions. In 2025, the directors participated in training sessions on Money Laundering prevention and Counter-Terrorism Financing, geopolitical risks, the new ECB guide on internal governance and risk culture, the new EBA guide on ESG risk management, Technology (Blockchain and Crypto) and cybersecurity. In addition, topics related to geopolitics and their implications for business have been addressed, contributing to a more

strategic view of conduct risks. For 2026, the board's training plan includes at least 5 additional sessions on neobanks, Artificial Intelligence, Digital Euro, Rarorac, ALCO portfolio management and money laundering prevention, among others, ensuring that directors continue to develop their knowledge in business conduct.

This structured approach enables the board to monitor the correct implementation of the Anti-Corruption Policy, the Ethics and Conduct Code and other frameworks of conduct, ensuring that Bankinter's corporate culture remains aligned with the principles of integrity and responsibility in all its operations.

Further information on the role of management, leadership and supervisory bodies and their training and education is included in section 1.3.1 of this report.

In terms of objectives related to business conduct, the Bank is committed to following all the recommendations of the Code of Good Governance that apply to it, as it has been doing in recent years.

In addition and in line with its sustainability strategy, the Bank has designed a sustainability training plan for its staff. The plan is structured at different levels of general knowledge, complemented by specific actions aimed at particular teams. The initial itinerary, accessible to all staff, includes two online courses through the Bankinter training platform: "Bankinter Sustainable" and "Sustainable Finance".

On this basis, the plan incorporates training actions aimed at anticipating regulatory and transition risks associated with Energy Saving Certificates (ECS), as well as programmes aimed at the commercial network and business teams focused on supporting SMEs with sustainable solutions. Likewise, specific initiatives are developed in decarbonisation, footprint measurement and sustainability reference frameworks, directed at organisations and various business segments to strengthen understanding of the climate transition and its impact on financial activity.

The itinerary is completed with advanced training in sustainable finance aimed at managerial profiles and business areas (including large-corporate, transactional and business banking) together with specialised programmes delivered with the support of external experts in areas such as risk, investment banking, asset management and large corporations. This progressive approach strengthens internal sustainability capabilities and advances the effective integration of ESG criteria in the bank's activity.

### **Ethics and conduct codes**

Bankinter has a Code of Professional Ethics and Regulations of the crime prevention committee. In addition, there is a single Whistleblowing Channel for the entire Group, which is detailed in section 4.6 Reporting Channels. An update of the risk map has been carried out to include the offences covered by Law 10/2022 of 6 September, such as sexual harassment, workplace harassment, and attacks on moral integrity in the workplace, including those committed in the digital environment, which will be approved during 2026.

Bankinter Group Ethics and Conduct Code establishes the basic principles of action and professional conduct practices for all of its staff and people who work for the Group. Its general objectives include promoting integrity, prudence, professionalism and transparency

in all the Group's activities. Furthermore, it seeks to protect the interests of customers, shareholders and other groups affected by the Group's activities.

The code addresses incidents and risks related to corruption, bribery, and other unethical behaviour, establishing a monitoring process through the Regulatory Compliance Unit (RCU) and the ethics and conduct code monitoring committee.

This Code applies to all staff, including those who hold management positions and make up the administrative bodies of Bankinter Group, as well as to agents, scholarship holders, interns, subcontractors and, in general, to all persons who work for or provide services to the Bank. It also includes family members and people linked to workers in certain cases. It covers all the Group's activities, including the upstream and downstream phases of the value chain and is applied in all geographical areas where Bankinter operates.

The board of directors of Bankinter is ultimately responsible for the application of the Ethics and Conduct Code and is aligned with regulations such as the Spanish Criminal Code.

The Ethics and Conduct Code establishes the different requirements to be met in the relationship with all the Bank's stakeholders, ensuring that all the Group's actions are transparent and ethical.

Bankinter makes the Ethics and Conduct Code available to all interested parties through its corporate website and other internal and external communication channels.

In this regard, the Bank's board of directors approved in 2023 the latest version of the Group's Code of Professional Ethics, the main modifications of which were:

- The reinforcement of some of the articles to provide greater consistency in terms of avoiding irregular behaviour.
- Modifications derived from some legislative developments, such as the incorporation of harassment as a crime with the legal person being held criminally responsible.
- Adaptation of the Confidential Reporting Channel to Directive 2019/1937 and Law 2/2023 transposing it into Spanish regulations, updating the Ethics and Conduct Code, in Title VIII, relating to the Channel, in January 2026.

Bankinter Group's crime prevention and professional ethics committee was created with the aim of consolidating the disciplinary and preventive functions linked to irregular conduct, including those of a criminal nature. This body is responsible for ensuring regulatory compliance and preventing crimes both within the bank and its subsidiaries. Since then, the committee has been responsible for monitoring the Code of Professional Ethics and supervising the prevention model implemented in the organisation.

The committee is made up of the head of Privacy and Litigation, who acts as chair, the Chief Financial Officer and head of Digital Banking, the Chief Risk Officer, the head of Internal Audit, the head of People Management, Corporate Communication and Quality, and the Corporate Director of Control and Compliance.

The committee's primary responsibility is to supervise and ensure compliance with Bankinter Group's criminal prevention model. Its functions include identifying activities with a risk of committing crimes, proposing measures and protocols for their prevention, sanctioning

breaches of the Code of Professional Ethics and other internal regulations and coordinating the implementation of prevention models in the Group's subsidiaries. It also manages the whistleblowing channel to report possible irregularities and carries out periodic reviews of the prevention model.

Committee meetings are held quarterly, although extraordinary meetings may be held when necessary. Decisions are adopted by majority vote and are documented in minutes kept by the secretary. The chairman of the committee reports annually to the audit committee on the activities and resolutions adopted.

During 2025, the Bankinter crime prevention and professional ethics committee processed 14 disciplinary cases (18 in 2024) for breaches of the Professional Ethics and Conduct Code by staff, of which 11 corresponded to personnel in Spain (12 in 2024) and 2 to Portugal (2 in 2024). In these cases, dismissal was adopted as a disciplinary measure on three occasions (all in Spain). The other penalties imposed in relation to the cases processed involved suspensions of employment and salary for periods depending on the seriousness of the offence.

In general terms, the irregular conduct detected has been derived from non-compliance with the entity's internal regulations regarding processes and operations and human and specific errors in relation to data processing, highlighting that, due to the robust and effective controls of the Criminal Compliance model, non-compliances are detected promptly, avoiding further consequences.

As a result of possible non-compliance with certain contractual obligations under the agency agreement, the case of one agent was reviewed in 2025 (4 in 2024), warning the agent to cease the irregular conduct.

### **The Regulatory Compliance function**

The Regulatory Compliance function reports to the risk and compliance committee of the board of directors, and is integrated within the Corporate Control and Compliance division ("DCC") for organisational purposes. This division performs a supervisory function, with the aim of providing the board of directors with an overall view of the Group's control and compliance situation, sharing methodology, tools and resources, as well as characteristics of independence, recognition and objectivity common to the second line of defence.

This organisational configuration allows for the homogenisation of the information systems of all these second-level control areas and provides them with the independence necessary to exercise their functions in line with best practices and allows for a single risk map, guaranteeing greater and better control, ensuring greater interaction between them, which translates into greater efficiency and optimisation of resources, providing this second line of defence with independence.

During 2025, the risk measurement methodology in the area of Regulatory Compliance and prevention of money laundering and terrorist financing has been applied at the corporate level and has been monitored in the tool common to all areas that make up the Directorate, SAP GRC.

The risk control culture, deeply rooted in the organisation, driven by the strong involvement of the board of directors and Senior Management, is transmitted to the business units with

agility and efficiency through this corporate structure, the systems and tools configured from the outset to ensure compliance with the rules and prevent undesirable behaviour.

Following the model based on the three lines of defence and guaranteeing the independence of the function, a structure appropriate to the principles and risk culture of the organisation has been chosen, integrating the different risks of banking activity and their centralised management through a corporate structure with responsibility for global scope.

With this institutional and regulatory framework, the bank developed the basic areas of the second line of defence, which is organised into the following units:

- Control and advice on regulations and banking transparency both in banking products and services, as well as investments and insurance, prevention of market abuse, the Internal Code of Conduct and Conflicts of Interest: Bankinter has implemented a methodology based on the risk approach that enables the risk of non-compliance in each area of activity to be assessed in relation to the provision of investment, banking and insurance services.
- Prevention of Money Laundering and Financing of Terrorism (AML/FT). In 2025, the risk control and management framework has continued to be strengthened, as well as centrally implemented monitoring.
- Risk Control and Internal Validation, which is responsible for control of credit, operational, technological, market and institutional risk.
- Financial Control and Analysis, which reviews the general framework for internal financial control and outsourced services.

The functions of Regulatory Compliance and Prevention of Money Laundering and Terrorist Financing report to the risk and compliance committee of the board of directors and are integrated into the Corporate Control and Compliance division, which has organisational responsibilities and exercises a supervisory function with the aim of ensuring global knowledge of the Group's control and compliance situation.

The Corporate Control and Compliance division ensures effective control of all risks in relation to respect for the company's culture and risk policies; compliance with established operating procedures; and compliance with established regulations. It also ensures that risks are managed in accordance with the defined level of risk appetite. This organisation has a global risk map incorporating all of the risks faced and a common information system through the use of a single control tool, including data protection, in order to ensure a comprehensive picture of all risks. This ensures it is a robust second line of defence.

This organisational structure enables the appropriate management of the risk of non-compliance with regulations, which entails a significant reputational risk, with a potential negative impact on the relationship with customers, markets, employees and authorities. In particular, non-compliance with regulations may lead to sanctions, damages or cancellation of contracts, with the consequent damage to the image projected by the bank.

In particular, the Corporate Control and Compliance division (CCD) participates in the following bodies of the bank:

- The regulatory compliance committee. It is the Senior Management body that monitors the Bank's policies in this area in accordance with the statute of the Regulatory Compliance function. The committee implements the policies in relation to the regulatory and regulatory compliance matters established by the board of directors' risk and compliance committee.
- The product and operational risk committee. It is the governing body for the products and services that Bankinter offers to customers in accordance with the product governance policy approved by the board of directors. The product and operational risk committee covers, among its main functions, the approval of the launch, modification or cancellation of new products and services offered to customers, the review or monitoring of the approval conditions of all products and services, as well as the monitoring and resolution of incidents related to these products and services and the monitoring and analysis of the main indicators associated with operational risk management.
- The internal control body. The internal control body is responsible for establishing and ensuring compliance with the policies and procedures for preventing money laundering and terrorist financing, in accordance with Law 10/2010 and other applicable regulations, which constitute the preventive framework of Bankinter Group. This body must be aware of the risks in this area of the Bank and ensure that the necessary measures are taken to effectively mitigate them.

Other specialist committees have been set up involving senior management to support the board's supervisory function, such as the crime prevention and professional ethics committee. The Corporate Compliance and Internal Control division (CCD) is involved in these to ensure effective and consistent risk management. In addition, the company participates in the corporate risk map monitoring committee, the credit risk models committee, the data management operations committee, the technological risk coordination committee, the information security and business continuity committee and the outsourcing committee.

### **Fight against corruption and bribery**

Bankinter Group has an Anti-Corruption Policy, approved by the audit committee and the board of directors, whose main objective is to convey a message of absolute rejection of corruption. This Policy establishes rules and principles of action to prevent and combat any corrupt conduct within the Group's activities. Together with the Circulars, mandatory policies and Ethics and Conduct Codes, it forms a solid and robust internal regulatory framework.

The board of directors of Bankinter is ultimately responsible for the implementation of the Anti-Corruption Policy. The objectives of this Policy include raising awareness of the risks of fraud and corruption, strengthening corporate policies to improve efficiency in combating these practices and fostering a culture of deterrence and early detection of corruption.

The Policy applies to all employees and members of Bankinter Group's governing bodies, with particular emphasis on the following potentially more vulnerable areas, without being an exhaustive list: Efficiency division, Risk Division and the directors of the branch network. 100% of the people who make up these areas have received training related to these topics.

Furthermore, it covers all the Group's activities, including the phases before and after the value chain, and extends to all the geographical areas where Bankinter operates.

In addition, the Policy is aligned with international regulations and standards such as the Spanish penal code, the UK Bribery Act, the US Foreign Corrupt Practices Act and the OECD Anti-Bribery Convention, and it is consistent with the United Nations Convention against Corruption. It is established taking into account the interests of the main stakeholders, ensuring that all the Group's actions are transparent and ethical.

Bankinter makes this policy available to all interested parties through its corporate website and other internal and external communication channels.

During the 2025 financial year, no legal cases related to corruption were brought against the Group (as was also the case in 2024).

### Anti-money laundering

The Money Laundering Prevention area, integrated within the Corporate Compliance and Control Unit, is responsible for ensuring compliance with the policies and procedures adopted by the entity regarding the prevention of money laundering and terrorist financing. Its objective is to ensure the proper detection, management, control and monitoring of existing risks arising from Money Laundering and Terrorist Financing, in compliance with all regulatory requirements in this area.

Preventing these activities is a strategic objective and an ethical commitment to society as a whole, to compliance with international standards and best practices in this area. In line with this objective, during 2025, Bankinter and its subsidiaries have continued developing the necessary control measures to comply with regulatory requirements and have developed and updated the Money Laundering and Terrorist Financing Risk Model (AML/CFT risk appetite framework and map aligned with the Bank's Framework), as well as the IT tools intended for this function.

Likewise, the AML/CFT Policies and Procedures Manual and all procedures included as annexes to said Manual have been updated, incorporating the proposals provided by the Supervisor and taking into account the regulatory changes and incorporating the changes in Bankinter Group (integration of EVO Banco into Bankinter SA and the conversion of AvantMoney into a Bankinter branch in Ireland).

The main objective of Bankinter's Anti-Money Laundering and Counter Terrorist Financing (AML/FT) Prevention Manual is to comply with the obligations established in Law 10/2010 of 28 April and its regulatory development. The Manual addresses matters related to the prevention of these crimes and establishes a continuous monitoring process to ensure its effectiveness and control activity in this area. It applies to all Bankinter activities, including all geographical areas where the Bank operates. The application is the responsibility of the Internal Control Body (OCI) and the board of directors of Bankinter.

Bankinter's AML/CFT Manual is adapted to the EBA guidelines and complies with the regulations derived from Law 2/2023 and Royal Decree 609/2023. It also refers to the adaptation to regulatory developments arising from Directive (EU) 2015/849 and the new EU legislative package for AML/CFT approved in 2024, which includes the approval of the

new Directive, the Single AML/CFT Regulation, and the creation of the Anti-Money Laundering and Countering the Financing of Terrorism Authority (AMLA). In preparing it, attention to the interests of the main stakeholders, including employees and customers, has been taken into account, and it is available on Bankinter's intranet, in the money laundering prevention section.

Each subsidiary and branch, for its part, has its own risk control and management policies that comply with the Framework established by the Group but are adapted to the specific regulations applicable in the host country, and with specific procedures, systems, processes and resources adjusted to the nature, size and complexity of the activities carried out, maintaining appropriate alignment with the Group's corporate policies.

In addition, work has continued on the Action Plan approved for the financial year in compliance with the recommendations issued by the External Expert.

As a general rule, all Group employees undergo compulsory annual training in AML, including those at greatest risk of exposure to corruption. During 2025, the update of Anti-Money Laundering training for the entire workforce was completed. In total, 6,351 individuals have completed this training, representing 95.1% of the Group's workforce and achieving the target set in the previous year, with a total of 7,965 hours delivered. The training has included content tailored to the different lines of defence, as well as to senior management and new hires. (In 2024, 4,954 employees completed the training, representing 74.4% of the workforce and a total of 5,210 hours).

In addition, the Group's board of directors receives annual training on anti-corruption, money laundering prevention and counter-terrorist financing.

As part of Bankinter's commitment to transparency and integrity and in line with the reinforcement of the ethical culture within the bank, refresher courses on the Prevention of Money Laundering will be launched in 2026, aimed at the entire workforce. The goal is for all of the Group's employees to have access to this training, which will include specific modules adapted to the Bank's different lines of defence, as well as for senior management and new hires.

Internal Audit has implemented a system for the prevention, detection and management of internal fraud. Its regulatory framework is being updated, but in general it works through alerts that are executed through mass data processing tools. The necessary investigations are carried out of these. If any irregular conduct or non-compliance with regulations is detected, the procedure established in the Code of Ethics is set in motion, submitting a report to the crime prevention and professional ethics committee so that it can adopt the appropriate disciplinary measures.

## Whistleblowing channels

The Bankinter Whistleblowing Channel is a mechanism established to identify, report, and investigate unlawful conduct or conduct contrary to the Code of Professional Ethics, internal regulations, or applicable legislation (including those related to Anti-Money Laundering and Counter-Terrorist Financing regulations and those related to financial, accounting, or control matters).

This channel also allows you to report conduct by superiors or colleagues that may be classified as moral or psychological harassment (mobbing) or sexual harassment, as well as any other attitude that conflicts with fundamental rights as a person.

It is available to both internal and external stakeholders, allowing complaints to be filed by internal staff, agents, suppliers and other stakeholders. Employees may access the channel through the corporate intranet, agents through the agents' extranet, suppliers through the supplier portal, and other stakeholders through Bankinter's corporate website. The channel allows the submission of anonymous and/or confidential reports through a secure system based on a code and a password selected by the whistleblower, ensuring that the whistleblower cannot be identified.

Throughout 2025, Bankinter drafted and approved the Whistleblowing Channel Policy, as well as the internal procedures for the management and investigation of submitted reports, in order to fully comply with Law 2/2023, regulating the protection of persons who report regulatory breaches and combating corruption. These texts were submitted to the audit committee and elevated to the board of directors for approval, and were subsequently published on the corporate website in March 2025. During 2026, the Code of Professional Ethics will be updated, including the modification described above.

Bankinter protects whistleblowers against retaliation, discrimination, or any unfair treatment, in accordance with the provisions of the Whistleblowing Channel Policy, the Code of Professional Ethics, and prevailing legislation. The system guarantees the total anonymity of the whistleblower, as well as legal protection against possible retaliation, discrimination, or any other type of unfair treatment. The policy itself expressly establishes that no retaliation will be taken against the whistleblower solely for reporting an irregularity.

The Policy itself states that no retaliation of any kind will be taken against the whistleblower solely for reporting. Furthermore, if the whistleblower has participated in the reported conduct, the fact that they became aware of it through the whistleblowing channel may be considered a mitigating factor by Bankinter Group and/or by the competent authority when determining their responsibilities.

Regarding training and information, all employees receive the Code of Professional Ethics upon joining the company, confirming their knowledge and commitment to the established procedures. In addition, at least once a year, communications are made on the intranet to remind people of the characteristics and access to the Whistleblowing channel, strengthening awareness about its use.

Bankinter has a robust procedure in place to promptly, independently and objectively investigate incidents related to business conduct, including those linked to corruption, bribery and other irregularities, through the Internal Audit department. This procedure is

designed to ensure that all complaints received are handled in a professional manner, protecting the rights of all parties involved and ensuring compliance with applicable regulations.

The form available on the website is in the language corresponding to the Group company to which the report relates. In addition, the tool used for managing reports provides full traceability between the report and the investigation carried out.

The Director of Internal Audit ensures the confidentiality of the complaints received and periodically reports to the audit committee of the board of directors on the management of complaints in accordance with established procedures. In the hypothetical event that the report affects the Internal Audit area, the Compliance division would assume responsibility and appoint an investigation team.

In 2025, 54 confidential reports of various types were received through the Confidential Whistleblowing Channel.

## Supplier relationship management

Bankinter's procurement process has been transformed in recent years as a result of the guidelines and requirements of European regulatory and supervisory bodies, in particular the European Central Bank (ECB), the European Banking Authority (EBA), and the Single Resolution Board (SRB). This process is constantly evolving to adapt to new requirements and regulations such as the new Digital Operational Resilience Regulation (DORA) of the European Parliament, or regulations relating to sustainability.

Additionally, it should be noted that, with the aim of complying with these regulations and strengthening supplier processes, the Supplier Management area was created in 2025. Also, in order to improve the efficiency, usability, traceability, and control of the process, Bankinter has continued to enhance the procurement procedure created in 2023 by relying on a market tool that has strengthened the ability to adapt to emerging regulatory and supervisory requirements.

One of the advantages of this procedure is that the entire process is centralised in a single tool, managing everything from supplier approval (with a specific sustainability module), through to the control of the necessary budget, continuing with the acquisition and risk analysis process and finally the closing and filing of the contract.

Within this procedure, the approval process and its corresponding sustainability module are a key element. Bankinter ensures that it works with suppliers that meet the criteria and solvency requirements established by Bankinter, as well as those required by European Banking Regulation (EBA) and the Digital Operational Resilience Regulation (DORA). For this purpose, different variables are evaluated, including sustainability criteria (social and environmental criteria), using a specific assessment, which on the basis of a scorecard derived from the supplier's answers, allows suppliers to be categorised as recommendable or non-recommendable according to ESG criteria. The Bank thoroughly evaluates suppliers under the following criteria:

1. Social criteria:

- Ethics and Conduct Code: it is verified whether the company has an ethics and conduct code or internal policies that promote integrity, transparency, and respect for human rights, in line with international best practices.
- Legal Compliance: regulatory compliance with specific legislation such as the General Disability Law and other social requirements is assessed.
- Social Sanctions: analysis is made of whether the supplier has been subject to social, labour or worker rights sanctions in the last three years.
- Special Employment Centres (CEE): it is assessed whether the provider promotes social inclusion through collaboration with special employment centres or the hiring of people with disabilities.

## 2. Environmental Criteria:

- Environmental Certifications: it is reviewed whether the supplier holds international certifications, such as ISO 14001 or EMAS, that attest to its commitment to the responsible management of natural resources and environmental protection.
- Carbon Footprint: information is requested on the analysis and reduction of their carbon footprint, evaluating the measures they apply to minimise their environmental impact.
- Environmental Impact of Products and Services: the environmental characteristics of the products and services offered are analysed, paying special attention to the sustainability of the materials, the workers and the products' life cycle.

In addition, Bankinter requests that suppliers provide documentation demonstrating compliance with the aforementioned aspects, such as:

- Corporate Social Responsibility (CSR) and sustainability policies.
- Quality (ISO 9001), environmental (ISO 14001, EMAS) and safety (ISO 45001) certifications.
- Reports on internal or external audits related to sustainability and regulatory compliance.
- Reports on the carbon footprint and measures adopted for its mitigation.

Likewise, as indicated in the Group's outsourcing and procurement of goods and services policies, the tool has a control system that will not allow the award of any supplier that has not been approved and is not recommended from a sustainability perspective. In this way, sustainability assessment is not only a control tool, but an opportunity to generate a positive impact throughout the supply chain.

In addition, during the 2025 financial year, an analysis was carried out of different third-party platforms specialising in supplier monitoring and evaluation, including ESG control, traceability, and monitoring mechanisms. In this context, Bankinter plans to begin

collaborating with this type of solution from 2026, as a complement to existing internal processes.

Through this entire process, Bankinter reinforces its commitment to sustainability and ensures that business relationships established with suppliers not only comply with the highest quality standards, but also provide value to society and contribute to environmental preservation.

Bankinter's supplier contracting process is reflected in the Governance documents of the Outsourcing Policy, as well as in the Procurement of Goods and Services Policy. Both policies fall within the regulatory framework of the recommendations contained in the European Banking Authority Guidelines on outsourcing arrangements, EBA/GL/2019/02, published on 25 February 2019 (hereinafter the "EBA Outsourcing Guidelines"), and Regulation (EU) 2022/2554 of the European Parliament and of the Council of 14 December 2022 on digital operational resilience for the financial sector (DORA Regulation), as well as the associated RTS.

These policies apply to all business lines and control areas of the entities forming Bankinter Group. The Outsourcing Policy has been approved by Bankinter's board of directors, while the Procurement Policy for Goods and Services has been approved by the outsourcing committee.

In the case of the Bank's subsidiaries and branches abroad, and in application of their own policies, the application of certain parts of the process, competences, signatures, amounts and/or responsibilities of this policy may vary in application of the principle of proportionality. In this way, they can have their own organisation based on their specific needs, which is why the awarding of the contracting of goods and services will depend on the people according to their organisational chart and their specific functions.

The contracting procedures detailed in this policy affect all contracts with third parties.

It should also be noted that Bankinter has a Supplier Code of Conduct (approved by the board of directors), which sets out the fundamental principles of conduct and professional standards that must govern the actions of all its suppliers and enshrines the ethical values that have traditionally guided its relationships with them.

The purpose of this code is to ensure that all suppliers and subcontracted companies comply with the provisions of the United Nations Global Compact, promote sustainable development, safeguard human rights, observe labour regulations and promote environmental protection, among other aspects. Ultimately, it is about ensuring that suppliers share and respect the ethical values that guide the conduct of the Group and its employees.

The principles outlined in this Code of Conduct are an important component when selecting and evaluating suppliers and failure to comply with them may also lead to termination of the contract. Consequently, extra financial criteria (environmental, social and governance) have been incorporated into the procedure for the evaluation and approval of suppliers.

In addition, Bankinter includes in its contracts with suppliers a clause on ethical and social management that commits them to preventing corruption, ensuring data protection,

avoiding child labour, and guaranteeing employment stability, among other requirements, as well as a specific ESG compliance clause, through which suppliers undertake to respect the environmental, social, and governance principles established by the Group, as well as to collaborate in sustainability evaluation and monitoring processes.

### Customer relationship management

Customer governance is taken into account in the following processes:

- In the risk analysis of the operations of legal persons, customer qualification processes are carried out on quantitative information (balance sheets, P&L, statistical models, etc.) and qualitative information. In this case, the analysis of qualitative information is collected in the subjectivity questionnaire, including issues related to the governance of the company such as, among others: the assessment of the company's shareholders, the management team, the size of the workforce and information provided by third parties from auditors, information services, customers, suppliers, competitors, the media and social networks, which help to form an assessment of the company's situation.

This qualitative rating plays an important role in obtaining the customer's Unified Risk System or Basel rating through its non-linear combination with the objective or quantitative rating.

This information is monitored by the customer account manager, risk analysts and regular checks by the organisation's risk managers, as well as by the credit risk managers, corporate sanctioning and the organisational director. Finally, the Risk Control unit establishes controls in its annual planning. These are authorised by the risk committee of the board of directors.

- In the processes of analysing customers and transactions, Bankinter's Money Laundering Prevention area, which is part of the Control and Compliance unit, is responsible for ensuring compliance with the bank's policies and procedures for preventing money laundering and terrorist financing. Its aim is to guarantee adequate detection, management, control and monitoring of the risks arising from money laundering and the financing of terrorism, and compliance with all related legislation. Preventing these activities is a strategic objective and an ethical commitment to society as a whole, to compliance with international standards and best practices in this area.
- The Group Risk Framework Agreement establishes sustainability principles to avoid financing activities that may be contrary to the Group's Sustainability Strategy. Bankinter has developed an exclusion policy in those business units that have significant environmental, social or economic impact due to the resources they consume, the human capital they apply or the controversy they generate.

This policy is complemented by sectoral policies/guidelines for specific sectors (defence, energy, agriculture and extractive sectors). In addition to the exclusion policy and sector guidelines, and considering their high impact, as a general rule, the social and environmental impact of the projects to be financed is analysed prior to making any decision with regard to investing in sectors such as: defence, medical research, the primary sector, energy, transport infrastructure, tourism, desalination and waste water treatment plants.

On the basis of the principles with which it aims to lead a transition towards sustainable development (with the help of its customers), the Bank is committed, in general, to not financing or investing in the following, except when there are duly justified circumstances:

- Companies that are known not to respect or support fundamental human rights, as per the United Nations Universal Declaration of Human Rights.
- Companies that do not respect or support labour rights in general and, in particular, child labour rights and rights relating to discrimination and forced labour, in accordance with the International Labour Organization's key conventions.
- Organisations and companies with court sentences deriving from corruption cases.
- Organisations and companies that have directly and significantly contributed to dictatorships and have benefited from such situations.
- Organisations and companies that are recurring and serious offenders in terms of prevailing legislation, applicable codes or agreements, especially criminal, labour and environmental regulations.
- Organisations and companies related in any way to child pornography and/or related in any way to sexual exploitation.
- Activities or projects that represent a risk or generate an impact on areas included on the UNESCO's list of World Heritage sites and the United Nations list of protected areas.

Specific exclusion criteria are also established for the defence, extractive, energy and agricultural sectors.

These operations are monitored by the Group's Risk and Sustainability areas, and relations are established with customers to analyse their policies and procedures for mitigating this type of risk.

In 2025, the ESG risk integration policy for loan decisions and the General Exclusion Criteria for lending were updated, extending the exclusion criteria identified for financing operations to loans.

- In the climate rating process, customers are classified in relation to their predisposition to be affected by physical and transition risks into five groups, from very high to very low.

The climate rating has been incorporated into the admission process to focus the dialogue with customers, especially with regard to the highest risks. This incorporates factors related to the climate and the environment into decision-making. It was decided to start this process with customers whose transition risk indicator is high or very high. For this group, the customer relationship manager should initiate a conversation with the customer with two objectives:

- To find out how they think climate change may be affecting their activities.
- To understand their plans to reduce such effects, the investments planned for this, and the possibility of Bankinter helping by providing financing for these investments, as appropriate.

The information obtained in this conversation must be included in the risk proposal under study and discussed in the corresponding risk committee. To help in this process, the climate rating is automatically included in the minutes of committee meetings. Fields have also been included in proposals for the customer's rating with space to include the information from this customer dialogue.

## 13.6. Indicators of potential transition risk linked to climate change

### 13.6.1. Credit quality of exposures by sector, issues and residual maturity

In accordance with Implementing Regulation (EU) 2022/2453 and for the purposes of Article 449a of Regulation (EU) 575/2013, the following table includes information on exposure to non-financial institutions in the banking book that are active in carbon-related sectors and on the quality of these exposures, whether they are considered doubtful or stage 2, as well as the related provisions and maturity ranges.

The amount disclosed in the column a corresponds to the gross carrying amount of loans and advances and debt securities to non-financial corporations other than those held for trading by sector of economic activity. The same CNAE classification has been used to classify them as for the financial information. Column b includes exposures to counterparties excluded from EU benchmarks reflecting the Paris Agreement according to Articles 12.1(d)-(g) and 12.2 of Regulation (EU) 2020/1818. The figures are for 31 December 2025.

#### Indicators of potential transition risk linked to climate change: credit quality of exposures by sector, issues and residual maturity (ESG1)

Sector or subsector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Gross carrying amount (Mn euros)					Accumulated impairment and provisions and negative fair value adjustments due to credit risk (million euros)			GHG emissions financed (counterpart's scope 1, 2 and 3 emissions) (in tonnes CO2 equivalent)		GHG emissions (column i): percentage of the gross carrying amount of the portfolio derived from company-specific information	≤ 5 years	>5 years ≤ 10 years	>10 years ≤ 20 years	> 20 years	Weighted average maturity
	Of which: exposures to undertakings excluded from the EU benchmarks harmonised with the Paris Agreement in accordance with Article 12(1)(d) to (g) and (2) of Regulation (EU) 2020/1818	Of which: environmentally sustainable (CCM)	Of which: phase 2 exposures	Of which: non-performing exposures	Of which: phase 2 exposures	Of which: non-performing exposures	Of which: scope 3 emissions financed									
1 Exposures to sectors that 1 are major contributors to climate change (1)	25,612	485	–	891	1,159	-601	-22	-540	4,652,896	2,984,167	18.00%	16,643	3,946	4,494	529	9.29
2 A - Agriculture, livestock raising, forestry and fishing	708	–	–	32	41	-21	-1	-18	269,862	41,527	5.50%	514	108	82	5	7.42
3 B - Extractive industries	74	–	–	2	6	-2	–	-2	19,176	6,291	13.60%	65	4	5	–	6.80
4 B.05 - Extraction of anthracite, coal and lignite	–	–	–	–	–	–	–	–	77	22	0.00%	–	–	–	–	3.66
5 B.06 - Extraction of crude oil and natural gas	–	–	–	–	–	–	–	–	–	–	0.00%	–	–	–	–	–
6 B.07 - Extraction of metal ores	13	–	–	–	–	–	–	–	3,672	1,131	10.90%	13	–	–	–	6.28
7 B.08 - Other extractive industries	56	–	–	2	6	-2	–	-2	13,270	4,141	14.50%	47	4	5	–	7.10
8 B.09 - Support activities to extractive industries	5	–	–	–	–	–	–	–	2,157	997	18.20%	5	–	–	–	5.19
9 C - Manufacturing	5,294	157	–	217	308	-146	-6	-130	1,987,223	1,353,453	26.30%	4,619	500	148	28	6.98
10 C.10 - Food industry	1,082	–	–	27	51	-23	-1	-21	440,915	344,806	27.60%	976	94	10	2	8.36
11 C.11 - Manufacture of beverages	213	–	–	19	9	-3	-1	-2	132,243	74,439	10.90%	165	39	9	–	6.45
12 C.12 - Manufacture of tobacco products	84	–	–	–	–	–	–	–	2,088	1,359	0.00%	84	–	–	–	3.67
13 C.13 - Textile industry	131	–	–	14	10	-4	–	-4	24,661	17,618	12.30%	116	11	4	1	6.02
14 C.14 - Manufacture of garments	82	–	–	4	15	-5	–	-5	10,017	7,162	11.90%	75	4	2	1	6.16

15	C.15 - Leather and footwear industry	62	–	–	2	14	-7	–	-7	8,584	6,323	4.30%	54	4	2	2	7.68
16	C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	153	–	–	4	9	-4	–	-3	26,649		3.20%	130	16	6	1	7.48
											15,774						
17	C.17 - Paper industry	143	–	–	3	12	-5	–	-5	73,917	37,853	13.40%	129	11	2	1	6.88
18	C.18 - Printing and reproduction of recorded media	94	–	–	7	12	-6	–	-5	11,550		3.40%	77	7	8	2	7.91
											7,974						
19	C.19 - Manufacture of coke and refined petroleum	157	157	–	19	–	–	–	–	282,404	248,166	44.40%	72	85	–	–	6.96
20	C.20 - Chemical industry	462	–	–	13	18	-5	–	-4	263,608	182,766	31.10%	377	24	58	3	7.53
21	C.21 - Manufacture of pharmaceutical products	177	–	–	3	1	–	–	–	16,249	9,698	48.20%	117	57	2	–	6.15
22	C.22 - Manufacture of rubber products	264	–	–	9	17	-9	–	-8	52,639	39,296	12.40%	236	22	6	1	6.35
23	C.23 - Manufacture of other non-metallic mineral products	281	–	–	8	14	-7	–	-7	221,413		31.00%	250	26	4	1	6.91
											54,972						
24	C.24 - Manufacture of base metals	264	–	–	3	15	-6	–	-5	160,095		40.20%	257	7	–	–	6.61
											84,442						
25	C.25 - Manufacture of fabricated metal products, except machinery and equipment	575	–	–	25	42	-23	-1	-21	117,050		15.60%	523	30	16	6	6.76
											102,996						
26	C.26 - Manufacture of computer, electronic and optical goods	60	–	–	3	6	-3	–	-3	4,286		12.40%	56	3	–	–	6.83
											3,026						
27	C.27 - Manufacture of electrical equipment and	132	–	–	2	4	-2	–	-2	24,968		14.80%	126	5	1	–	5.88
											23,219						
28	C.28 - Manufacture of machinery and equipment	261	–	–	18	19	-11	-1	-9	43,922		19.00%	235	19	5	2	6.24
											33,368						
29	C.29 - Manufacture of vehicles, trailers and semi-trailers	281	–	–	19	12	-7	-1	-5	24,825		18.30%	275	5	–	–	5.91
											21,470						
30	C.30 - Manufacture of other transport equipment	87	–	–	4	3	-1	–	-1	7,666		87.50%	71	15	–	1	7.10
											7,210						
31	C.31 - Manufacture of furniture	96	–	–	3	12	-6	–	-6	13,964		4.80%	81	7	6	2	7.58
											10,903						
32	C.32 - Other manufacturing	60	–	–	6	6	-3	–	-3	7,900		4.30%	51	4	4	1	7.09
											5,590						
33	C.33 - Repair and installation of machinery and equipment	93	–	–	2	7	-3	–	-3	15,610		6.00%	85	5	3	1	4.76
											13,026						
34	D - Supply of electricity, gas, steam and air conditioning	1,935	119	–	6	18	-13	–	-10	145,068		27.00%	708	336	889	2	11.21
											89,684						
35	D35.1 - Production, transmission and distribution of electrical	1,840	30	–	6	17	-13	–	-10	114,478		27.90%	674	275	889	2	11.45
											68,243						
36	D35.11 - Production of electrical energy	1,547	–	–	4	10	-9	–	-7	72,583		22.20%	493	238	816	–	12.02
											48,971						
37	D35.2 - Production of gas; distribution by pipeline of gaseous fuels	89	89	–	–	–	–	–	–	29,891		7.90%	29	60	–	–	6.47
											21,305						
38	D35.3 - Steam and air-conditioning supply	6	–	–	–	1	–	–	–	699		2.90%	5	1	–	–	7.37
											135						

39	E - Supply of water, sanitation, waste management and decontamination	199	—	—	4	4	-2	—	-2	203,600		37.30%	179	13	6	—	6.05
											74,125						
40	F - Construction	3,135	—	—	91	156	-98	-2	-91	283,602	237,922	17.10%	1,956	331	521	328	11.38
41	F.41 - Construction of buildings	1,737	—	—	63	66	-43	-1	-38	110,393		12.40%	829	209	397	302	13.88
											93,262						
42	F.42 - Civil engineering	582	—	—	2	15	-9	—	-8	65,820	58,785	32.20%	425	44	98	15	8.89
43	F.43 - Specialised construction activities	815	—	—	26	76	-46	-1	-44	107,389		16.50%	702	78	26	10	7.55
											85,875						
44	G - Wholesale and retail commerce; motor vehicle and motorcycle repair	5,748	209	—	285	406	-221	-8	-203	950,506		13.90%	5,018	506	181	43	6.78
											847,328						
45	H - Transport and storage	1,593	—	—	41	85	-43	-1	-40	601,085	199,851	23.60%	1,023	392	171	7	8.35
46	H.49 - Inland and pipeline transport	834	—	—	19	53	-29	-1	-27	361,389		22.30%	580	140	108	6	8.28
											96,878						
47	H.50 - Inland waterway transport	141	—	—	7	1	—	—	—	62,877		5.60%	14	127	—	—	9.88
											13,267						
48	H.51 - Air transport	61	—	—	9	13	-4	—	-4	41,791	6,663	49.40%	57	3	—	—	3.97
49	H.52 - Warehousing and support activities for transport	525	—	—	6	17	-9	—	-8	130,781		23.90%	340	122	62	1	8.80
											79,850						
50	H.53 - Postal and courier activities	33	—	—	—	2	-1	—	—	4,248		44.80%	32	1	—	—	4.23
											3,193						
51	I - Accommodation and food	1,667	—	—	72	70	-31	-1	-28	120,129	86,999	31.90%	932	409	306	20	9.65
52	L - Real estate activities	5,260	—	—	140	65	-23	-2	-16	72,645	46,987	3.90%	1,631	1,347	2,186	97	12.64
53	Exposures to sectors other than those that are major contributors to climate change*	8,382	—	—	164	265	-208	-7	-184				6,886	835	607	53	3.75
54	K - Financial and insurance activities	—	—	—	—	—	—	—	—				—	—	—	—	—
55	Exposures to other sectors (NACE codes J, M - U)	8,382	—	—	164	265	-208	-7	-184				6,886	835	607	53	6.19
56	<b>TOTAL</b>	<b>33,994</b>	<b>485</b>	<b>—</b>	<b>1,055</b>	<b>1,425</b>	<b>-809</b>	<b>-29</b>	<b>-723</b>	<b>4,652,896</b>	<b>2,984,167</b>	<b>18.00%</b>	<b>23,529</b>	<b>4,781</b>	<b>5,101</b>	<b>583</b>	<b>6.72</b>

Figures in millions of euros

\* In accordance with Commission Delegated Regulation (EU) 2020/1818 supplementing Regulation (EU) 2016/1011 as regards minimum standards for EU climate transition benchmarks and EU benchmarks harmonised with the Paris Agreement (Regulation on Climate Transition Reference Standards), Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006.

As can be seen, exposures outside the Paris agreement constitute a very small amount of the total book.

With regard to the GHG emissions financed (counterpart Scope 1, 2 and 3 emissions), measured in tonnes of CO<sub>2</sub> equivalent, it has to be considered, first of all, that the current situation is characterised by a low volume of observed information. This depends to a large extent on the deployment of regulatory initiatives aimed at significantly improving the disclosure of sustainability-related information by both financial and non-financial companies (in particular the NFRD and CSRD directives). This means that a significant percentage of the emissions declared and attributed to lending by Bankinter are estimates, applying the criteria described in section 13.3.4.

Finally, it should be noted that the estimate of emissions financed of non-financial corporations is made for Spain and Portugal, given the availability of information.

### 13.6.2. Loans collateralised by immovable property – energy efficiency of the collateral

The following template shows the exposures of the banking book by energy efficiency segment. This has been done by taking the gross carrying amount of residential and commercial real estate secured loans and repossessed real estate collateral, including information on the energy efficiency level of the collateral. Directive 2010/31/EU of the European Parliament and of the Council (16)\* and Directive 2012/27/EU of the European Parliament and of the Council (17)\* promote policies aimed at achieving a highly energy-efficient and decarbonised building stock by 2050. Directive 2010/31/EU introduced energy performance certificates as instruments to improve the energy performance of buildings. These certificates are recognised by a Member State or by a legal bank designated by a Member State, which indicate the energy performance of a building or a building unit, calculated in accordance with this Directive.

Energy efficiency information at the building level is obtained through Energy Performance Certificates. Although it is currently compulsory in all property purchase and sale transactions (except for those that are exempt from certification due to their type), the fact is that, in order to extend this calculation to the entire portfolio, it has been necessary to estimate the emissions rating of quite a few properties. The bank has contracted a service that enables searches of the certificates in the public registries of Spain, Portugal and Ireland. As a result, estimation is only used when no energy certificate can be found for the property.

In case the certificate exists, both the energy consumption and the emissions of the building are taken into account. If, however, it is necessary to resort to the estimation of the energy rating, the consumption is taken as representative of the energy rating, considering its location, climate zone and typology. The preferred estimation criterion is through actual evidence in the same building. Where this does not exist, a model is used to determine the energy efficiency label, both in terms of emissions and consumption, considering the specific characteristics of the building, based on the similarity of the property to other similar properties in the same building or using an estimate based on the characteristics of the building itself.

In Portugal, since 2023, information on energy certificates has been incorporated, both actual and estimated, for cases where it was not possible to obtain the observed information. As not all residential or commercial properties currently have energy efficiency certificates, it is sometimes necessary to estimate this information. This information is inferred using a model based on available data for properties for which the energy certificates are known. In addition to these energy certificates, the information provider engaged by the Bank uses other variables to infer the energy certification of the property as accurately as possible. These include the energy certificates for the building as a whole, registry data, information on properties in the same building, geolocation, the year of construction, and the climate zone. The model uses this information to infer the data for the properties for which it does not have actual certificate information, assigning a reliability to these estimates depending on the quantity of data, its source and quality, its consistency and supporting evidence. The reliability reported can be: Very high: Energy certificate data for the building and similar properties and this information is consistent (similar

certifications, renovations, etc.) with the construction data for the building and reference statistics or data obtained from evaluations of other elements of the building or of the property. High: Energy performance certification data for the building are available, but there is lower consistency, or the number and quality of the data and/or similarity data available (from other buildings with similar years of construction, climate zones, materials, thermal envelope, fuels, etc.) are limited – although with a high degree of correlation and sufficient quantity. Medium: There is no certificate data for the building and the information must be inferred from similar data. Low: The building cannot be located exactly and data collected at different levels of detail must be used depending on the capacity to locate the building, such as the census, postcode or municipality.

The necessary procedures have been carried out in Ireland since 2023 to obtain information on Energy Efficiency Certificates through property inspections. Estimates were used in other cases. A median BER (Building Energy Rating) was provided by Sustainable Energy Ireland (SEI) for small areas, and this was provided at the building level for residential units where this data is available. The certificate information was estimated in all other cases using the most frequent BER in small areas for the specific type of building, as SEI also provides information on the structure of buildings, fuels used for water and space heating, and type of roof.

In the case of foreclosed properties, the energy efficiency certificate is available for those that are not exempt and are in a marketable situation. A large part of the book is not in this state, which is why coverage is limited.

It should also be noted that among the properties under guarantee without an energy label, there is a relevant volume of categories, such as industrial buildings and parking spaces, which are not subject to rating.

## Indicators of potential transition risk linked to climate change: loans collateralised by immovable property – Energy efficiency of the collateral (ESG2)

Counterparty sector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Total gross carrying amount (in millions of euros)															
	Energy efficiency level (energy performance score in kWh/m <sup>2</sup> of actual guarantee)						Energy efficiency level (EPC label of the collateral)						Collateral without EPC label			
	0 ≤ 100	> 100 ≤ 200	> 200 ≤ 300	> 300 ≤ 400	> 400 ≤ 500	> 500	A	B	C	D	E	F	G			Of which: estimated energy efficiency level (energy performance score in kWh/m <sup>2</sup> of the actual guarantee)
1 Total within the EU	46,203	11,144	14,153	8,707	2,116	588	291	2,396	2,399	3,083	3,841	9,402	1,615	1,852	21,614	57 %
2 Of which: loans secured by commercial real estate	7,857	468	969	540	204	90	61	222	365	513	355	378	107	82	5,835	5.30 %
3 Of which: loans secured by residential real estate	38,325	10,675	13,182	8,165	1,911	498	230	2,173	2,034	2,571	3,485	9,021	1,508	1,770	15,761	76.80 %
4 Of which: collateral obtained by taking possession: residential and commercial real estate	21	1	2	1	–	–	–	–	–	–	1	3	–	–	18	0.00 %
5 Of which: estimated energy efficiency level (energy performance score in kWh/m <sup>2</sup> of the actual guarantee)	12,411	3,429	5,162	2,986	549	187	97	–	–	–	–	–	–	–	–	–
6 Total outside the EU																
7 Of which: loans secured by commercial real estate																
8 Of which: loans secured by residential real estate																
9 Of which: collateral obtained by taking possession: residential and commercial real estate																
10 Of which: estimated energy efficiency level (energy performance score in kWh/m <sup>2</sup> of the actual guarantee)																

Figures in millions of euros

### 13.6.3. Indicators of potential transition risk linked to climate change: harmonisation parameters

The following template includes information on the harmonisation efforts with the Paris Agreement for a number of sectors.

#### Indicators of potential transition risk linked to climate change: harmonisation parameters (ESG3)

	a	b	c	d	e	f	g
	Sector	NACE Sectors (minimum)	Book gross carrying amount (M euros)	Harmonisation parameters **	Year of reference	Distance to IEA NZE2050 in % ***	Target (year of reference + 3 years)
1	Power	35	1939.65	44.23	Dec-2025	0.6801	35.66
2	Fossil fuel combustion	05 - 06 - 19	341.9	8.04	Dec-2025	0.5943	65.06
3	Steel	24	148.48	34.16	Dec-2025	0.3307	1.06

#### Notes:

\*\* Power – Average tonnes of CO<sub>2</sub> per MWh; Fossil fuel combustion – Average tonnes of CO<sub>2</sub> per GJ; Steel – Average tonnes of CO<sub>2</sub> per tonne of production

\*\*\* PiT distance to 2030 NZE2050 scenario in % (for each metric)

In the current period, Bankinter Group has updated its decarbonisation approach in line with the EBA's expectations (IRP – Pillar III), moving to define and report targets based on intensity metrics per unit of production. The Group has aligned its analysis with the carbon-intensive sectors that the EBA expects to be covered in terms of transition risk, in line with the Pillar III regulatory templates.

As a result of this methodological change, in the current period the Entity reports on the sectors with the greatest climate impact and relevance in its portfolio, for which objectives have been set in accordance with this new approach.

### 13.6.4. Exposures to the top 20 carbon-intensive firms

Aggregated information on exposures to the world's most carbon intensive counterparties is included in the table below. The Carbon Major Report database has been used as a source of identification.

The gross carrying amount reported corresponds to the total of the banking book exposures to counterparties listed above.

Within the context of simplifying ESG requirements in Europe, and following the EBA's 6 August letter of no action on the application of Pillar 3 ESG disclosure requirements, column c - Of which: environmentally sustainable - is suspended during the transitional period until the entry into force of the implementing technical standards (ITS), which is currently under review.

#### Indicators of potential transition risk linked to climate change: exposures to the top 20 carbon-intensive firms (ESG4)

	a	b	c	d	e
	Gross carrying amount (aggregated)	Gross carrying amount vis-à-vis counterparties compared to the total gross carrying amount (aggregate) (1)	Of which: environmentally sustainable (CCM)	Weighted average maturity (2)	Number of the 20 most polluting companies included
1	94.68	0.28%	N/A	5.2	1

(1) For counterparties among the world's top 20 carbon emitting companies.

Figures in millions of euros

(2) Maturity shown in years

### 13.7. Climate change physical risk:

#### 13.7.1. Exposures subject to physical risk

The following template includes banking book exposures, including loans and advances and debt securities neither held for trading nor held for sale, exposed to chronic and acute weather-related hazards by sector of activity and by geographical area of counterparty or collateral.

Bankinter uses a structural approach to evaluate sensitivity to physical risks, as described in the European Central Bank's "Towards climate-related statistical indicators" document. This approach involves breaking the problem down into three levels:

- Identification of climate risk factors;
- The exposure of customers to these factors;
- The vulnerability of customers to each of the risk factors materialising.

These levels are not independent of each other, as it is expected that a more exposed company will seek to invest more in adaptation. Therefore, we need to include aspects related to the energy transition and adaptation to physical risks in our dialogue with our customers.

The Bank has various sources of information for identifying climate risk factors. First, the Bank has engaged a service that allows it to identify a series of physical risk indicators for

each property, according to its geolocation, including, for example, the risks of river and sea flooding and desertification. These risks are assessed on a qualitative scale according to their intensity. This information is used with indicators from the Copernicus databases to enable us to characterise physical risks at the postcode level. This is particularly important in determining exposure to the various risks of productive activities.

In addition, in November 2024, the Network for Greening the Financial System (NGFS) published the so-called Phase V of its scenarios, the most significant development being the incorporation of a new damage function that gives enormous prominence to physical risks.

The factors considered in the sensitivity analysis are, therefore:

- Desertification, drought and heat waves, which are closely related. These are classified as acute and chronic risks.
- River flooding, which is classified as an acute risk.
- Sea flooding, which is classified as an acute and chronic risk.
- Forest fires, which are classified as an acute risk.

Once the intensity of the exposure has been determined, we select the high and very high risk levels. As a result, financial instruments with collateral exposed to these levels of risk in relation to flooding and very high risks of desertification are considered sensitive.

We need to perform vulnerability analysis for productive activities as there are many transmission channels for acute physical risks and they are not limited to the impact on physical assets. We do this based on the following cross-referenced table, which establishes the ways activity may be affected by each of the physical risks considered:

Physical risks	Impacts					
	Impact on physical assets (due to direct damage or loss of value)	Limitations on access for workers	Lower productivity	Supply problems	Higher costs	Lower sales
<b>Flooding</b>	Infrastructure Buildings Crops Machinery Stock	Yes		Damage to the electricity distribution grid Impact on transport	More expensive insurance	Customer limitations Impact on transport Reduced tourism
<b>Heat waves</b>	Crops Livestock Forests	No	Activities carried out outdoors or without sufficient cooling capacity Reductions in fishing catches Crops Livestock Forests Restriction of activities due to fire risk	Saturation of the power supply network	Higher cooling/dehumidification costs for plant and transport More expensive insurance	Reduced tourism Customer limitations
<b>Drought</b>	Crops Livestock Forests	No	Crops Livestock Forests	Water-intensive sectors Limitations on hydroelectric production	More expensive insurance	Reduced tourism
<b>Forest fires</b>	Infrastructure Buildings Crops Livestock Forests Machinery Stock	Crop, livestock and forestry areas	No	Damage to the electricity distribution grid Impact on transport	More expensive insurance	Reduced tourism Impact on transport

The significance that all these impacts might have is assessed for each productive activity based on objective factors, such as statistics on electricity and water consumption, dependence on transport, etc. This exercise enables us to assess vulnerability by level of activity and risk type. As a result, the exposure presented as sensitive in the sectors of activity corresponds to customers who are highly exposed and vulnerable to the various physical risks.

Assessment of these risks requires consideration of the company's productive activity and the characteristics of other real estate collateral belonging to the company. In the case of business exposures secured by real estate, analysis of the productive activity is combined with analysis of the characteristics of the property. In this regard, a company with business activity in a territory exposed to certain physical risks may use real estate collateral for its operations in other areas that are not subject to physical risks. In these cases, the company's exposure to physical risks considers not only the counterparty's geographical area but also the location of the real estate used as collateral in the company's mortgage transactions.

In relation to the information published in June 2024, and following the experience gained from the DANA event, a more conservative approach has been adopted for the quantification of risks in subsequent reports when different levels of exposure are observed within the same area.

The increase in exposures sensitive to the impact of acute phenomena linked to climate change in the mortgage book in June 2025 was due to improved quality of information on the physical risks of river flooding, which resulted from the review and update of the preliminary assessments of flooding risks in the intra-community basins of Andalusia (Order of 4 April 2025).

## Climate change physical risk: exposures subject to physical risk (ESG5)

Variable: geographical area subject to physical risk linked to climate change: acute and chronic events	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	Gross carrying amount (m euros)														
	Of which: exposures sensitive to the impact of physical phenomena linked to climate change														
	Breakdown by maturity bucket					Of which: exposures sensitive to the impact of chronic phenomena linked to climate change	Of which: exposures sensitive to the impact of acute phenomena linked to climate change	Of which: exposures sensitive to the impact of both chronic and acute phenomena related to climate change	Of which: phase 2 exposures	Of which: non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				
			≤ 5 years	>5 years ≤ 10 years	>10 years ≤ 20 years	> 20 years	weighted average maturity							Of which: phase 2 exposures	Of which: non-performing exposures
1 A - Agriculture, livestock raising, forestry and fishing	708	216	50	26	-	2	-	78	214	13	24	-12	-1	-11	
2 B - Extractive industries	74	9	-	1	-	-	-	11	-	-	2	-1	-	-1	
3 C - Manufacturing	5,294	459	55	6	3	-	-	522	1	17	40	-16	-1	-15	
4 D - Supply of electricity, gas, steam and air conditioning	1,935	21	86	33	-	1	-	139	-	-	1	-1	-	-	
5 E - Supply of water, sanitation, waste management and decontamination	199	2	-	-	-	-	-	2	-	-	-	-	-	-	
6 F - Construction	3,135	136	39	29	23	-	-	210	17	9	30	-15	-	-15	
7 G - Wholesale and retail commerce; motor vehicle and motorcycle repair	5,748	384	38	22	2	-	-	441	4	20	27	-12	-1	-11	
8 H - Transport and storage	1,593	20	-	1	-	-	-	20	1	-	2	-1	-	-1	
9 L - Real estate activities	5,260	141	120	163	6	1	-	375	56	15	6	-1	-	-1	
10 Loans secured by residential real estate	38,325	29	151	438	465	18	-	649	434	30	23	-3	-	-2	
11 Loans secured by commercial real estate	7,857	98	228	243	-	9	-	285	285	24	14	-4	-	-3	
12 Recovered collateral	21							4	-			-2			
13 Other relevant sectors (breakdown below, if applicable)															

Figures in millions of euros

# Annexes



## Annexes:

### Annex I: CCA - Main features of regulatory own funds instruments and eligible liability instruments

1	Issuer	Bankinter. S.A.	Bankinter. S.A.	Bankinter. S.A.	Bankinter. S.A.	Bankinter. S.A.	Bankinter. S.A.	Bankinter. S.A.	Bankinter. S.A.	Bankinter. S.A.	Bankinter. S.A.	Bankinter. S.A.	Bankinter. S.A.
2	Unique identifier	XS3099152756	XS2585553097	ES0213679030	ES02136790F4	ES02136790Q1	ES02136790T5	ES0213679JR9	ES0213679OS7	ES0213679OP3	ES0213679O06	ES0213679OR9	ES0213679OU3
2a	Public or private placement	Private	Private	Private	Private	Private	Private	Private	Private	Private	Private	Private	Private
3	Legislation applicable to the instrument	Spanish law	Spanish law	Spanish law	Spanish law	Spanish law	Spanish law	Spanish law	Spanish law	Spanish law	Spanish law	Spanish law	Spanish law
3a	Contractual recognition of the depreciation and conversion powers of resolution authorities.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Regulatory treatment													
4	Regulatory treatment taking into account CRR transitional rules where appropriate.	Additional tier 1 capital	Additional tier 1 capital	Tier 2 capital (eligible liabilities represent a fraction)	Tier 2 capital (eligible liabilities represent a fraction)	Tier 2 capital (eligible liabilities represent a fraction)	Tier 2 capital	–	–	–	–	–	–
5	CRR post-transition rules	Additional tier 1 capital	Additional tier 1 capital	Tier 2 capital	Tier 2 capital	Tier 2 capital	Tier 2 capital	Eligible liabilities					
6	Permitted on an individual/ (sub)consolidated/ individual and (sub)consolidated basis	Consolidated	Consolidated	Consolidated	Consolidated	Consolidated	Consolidated	Consolidated	Consolidated	Consolidated	Consolidated	Consolidated	Consolidated
7	Type of instrument	Potentially convertible perpetual securities	Potentially convertible perpetual securities	Subordinated debentures	Subordinated debentures	Subordinated debentures	Subordinated debentures	Simple nonpreferred bonds	Simple nonpreferred bonds	Simple nonpreferred bonds	Ordinary unsecured bonds	Ordinary unsecured bonds	Ordinary unsecured bonds
8	Amount recognised in regulatory capital or eligible liabilities (thousands of euros)	Amount recognised in regulatory capital: 496,813 Eligible liabilities: 500,000	Amount recognised in regulatory capital: 301,928 Eligible liabilities: 300,000	Amount recognised in regulatory capital: 50,249 Eligible liabilities: 81,894	Amount recognised in regulatory capital: 721,513 Eligible liabilities: 750,000	Amount recognised in regulatory capital: 206,114 Eligible liabilities: 200,000	Amount recognised in regulatory capital: 303,904 Eligible liabilities: 300,000	750,000	750,000	500,000	500,000	750,000	500,000
9	Nominal amount of the instrument (thousands of euros)	500,000	300,000	81,894	750,000	200,000	300,000	750,000	750,000	500,000	500,000	750,000	500,000
EU ga	Issue Price	100.00%	100.00%	100.00%	99.80%	99.47%	100.00%	99.63%	99.89%	99.74%	99.93%	99.67%	99.98%
EU gh	Redemption price	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
10	Accounting classification	Liabilities-amortised cost	Liabilities-amortised cost	Liabilities-amortised cost	Liabilities-amortised cost	Liabilities-amortised cost	Liabilities-amortised cost	Liabilities-amortised cost	Liabilities-amortised cost	Liabilities-amortised cost	Liabilities-amortised cost	Liabilities-amortised cost	Liabilities-amortised cost
11	Original issue date	30/6/2025	6/2/2023	14/5/1998	23/6/2021	25/3/2024	8/5/2025	6/2/2020	4/2/2025	13/9/2023	3/5/2023	10/9/2024	3/11/2025
12	Perpetual or with maturity date	Perpetual	Perpetual	Maturity established	Maturity established	Maturity established	Maturity established	Maturity established	Maturity established	Maturity established	Maturity established	Maturity established	Maturity established

13	Initial maturity date	No maturity	No maturity	18/12/2028	23/12/2032	25/6/2034	8/5/2035	6/10/2027	4/2/2033	13/9/2031	3/5/2030	10/9/2032	3/11/2033
14	subject to prior approval by the supervision authorities placement to the	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Si	Si
15	Optional call date, contingent call dates and redemption amount	30/6/2030	15/8/2028	23/12/2027: 100% of the nominal investment amount, in case of Regulatory Event or Tax Event.	25/03/2029 - 25/06/2029. 100% of the nominal investment amount, in case of Regulatory Event or Tax Event.	08/05/2030 - 08/08/2030. 100% of the nominal investment amount, in case of Regulatory Event or Tax Event.	In case of Eligibility Event or Tax Event: 100% of the nominal amount of investment.	04/02/2032; In case of Eligibility Event or Tax Event: 100% of the nominal amount of investment.	09/13/2030; 100% refund of the nominal amount or Tax Event: 100% of the nominal amount of investment.	In case of Eligibility Event: 100% of the nominal amount of investment.	In case of Eligibility Event: 100% of the nominal amount of investment.	03/11/2032; 100% refund of the nominal amount or Tax Event: 100% of the nominal amount of investment.	
16	Dates in subsequent periods, if applicable	-	-	-	-	-	-	-	-	-	-	-	-
Coupons/dividends													
17	Fixed or floating dividend or coupon	Fixed and variable	Fixed and variable	Fixed	Fixed	Fixed	Fixed and variable	Fixed	Fixed and variable	Fixed	Fixed	Fixed and variable	
18	Coupon interest rate and any related index	6%	7.375%	6.000%	1.250%	5.000%	4.125%	0.625%	3.625%	4.875%	4.375%	3.5%	3.25%
19	Existence of a dividend stopper	No	No	No	No	No	No	No	No	No	No	No	No
EU 20 a	Fully discretionary, partially discretionary or compulsory (in calendar terms)	Fully discretionary	Fully discretionary	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
EU 20 b	Fully discretionary, partially discretionary or compulsory (in terms of amount)	Fully discretionary	Fully discretionary	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
21	Existence of a coupon step up or other incentives to redeem	No	No	No	No	No	No	No	No	No	No	No	No
22	Non-cumulative or cumulative	Non-cumulative	Non-cumulative	Cumulative	Cumulative	Cumulative	Non-cumulative	Cumulative	Non-cumulative	Cumulative	Cumulative	Cumulative	Cumulative
23	Convertible or non-convertible	Convertible	Convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	5.125% CET1	5.125% CET1	-	-	-	-	-	-	-	-	-	-
25	If convertible, totally or partially	Totally	Totally	-	-	-	-	-	-	-	-	-	-

26	If convertible, applicable conversion rate	Convertible into new Bankinter ordinary shares	€200,000 / Max(market price of an ordinary share; floor price - €4.32036; €0.30)	–	–	–	–	–	–	–	–	–	–
27	If convertible, mandatory or optional conversion	Mandatory	Mandatory	–	–	–	–	–	–	–	–	–	–
28	If convertible, specify instrument type convertible into	Common shares	Common shares	–	–	–	–	–	–	–	–	–	–
29	If convertible, specify issuer of instrument they convert into	Bankinter, S.A.	Bankinter, S.A.	–	–	–	–	–	–	–	–	–	–
30	Write-down features	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
31	If write-down, writedown trigger(s)	Bail-in powers of the competent resolution authority	Bail-in powers of the competent resolution authority	Bail-in powers of the competent resolution authority	Bail-in powers of the competent resolution authority	Bail-in powers of the competent resolution authority	Bail-in powers of the competent resolution authority	Bail-in powers of the competent resolution authority	Bail-in powers of the competent resolution authority	Bail-in powers of the competent resolution authority	Bail-in powers of the competent resolution authority	Bail-in powers of the competent resolution authority	Bail-in powers of the competent resolution authority
32	If write-down, total or partial	In whole or in part, at the discretion of the competent resolution authority	In whole or in part, at the discretion of the competent resolution authority	In whole or in part, at the discretion of the competent resolution authority	In whole or in part, at the discretion of the competent resolution authority	In whole or in part, at the discretion of the competent resolution authority	In whole or in part, at the discretion of the competent resolution authority	In whole or in part, at the discretion of the competent resolution authority	In whole or in part, at the discretion of the competent resolution authority	In whole or in part, at the discretion of the competent resolution authority	In whole or in part, at the discretion of the competent resolution authority	In whole or in part, at the discretion of the competent resolution authority	In whole or in part, at the discretion of the competent resolution authority
33	If write-down, permanent or temporary	Permanent	Permanent	Permanent	Permanent	Permanent	Permanent	Permanent	Permanent	Permanent	Permanent	Permanent	Permanent
34	If temporary writedown, description of write-up mechanism	–	–	–	–	–	–	–	–	–	–	–	–
EU 34 a	Type of subordination (only for eligible liabilities)	–	–	–	–	–%	–%	Contractual	Contractual	Contractual	Contractual	Contractual	Contractual
EU 34 b	Order of precedence of the instrument in ordinary insolvency proceedings	2	2	3	3	3	3	8	8	8	9	9	9
35	Position in the subordination hierarchy in liquidation (indicate the next highest instrument type)	Tier 2 capital instruments	Tier 2 capital instruments	Ordinary nonpreferred credits	Ordinary nonpreferred credits	Ordinary nonpreferred credits	Ordinary nonpreferred credits	Ordinary credits	Ordinary credits	Ordinary credits	After ordinary credits	After ordinary credits	After ordinary credits
36	Non-compliant features following transition	No	No	No	No	No	No	No	No	No	No	No	No

37	If so, specify noncompliant features	–	–	–	–	–	–	–	–	–	–	–	–
EU 37 a	Link to the full mandate and conditions of the instrument (marking)	–	–	<a href="#">Prospectus</a>									

Figures in thousands of euros

## Annex II: CC1 - Composition of regulatory Own Funds.

	a)	b)	
	Amounts	Source based on statement of financial position reference numbers or letters in the regulatory scope of consolidation	
<b>Common equity tier 1: Instruments and reserves</b>			
1	Capital instruments and the related share premium accounts	269,660	Note 21, item (a) of the notes to the Group's financial statements
2	Retained earnings	5,469,969	
3	Accumulated other comprehensive income (and other reserves)	-10,081	Note 21 (c) to the notes to the financial statements and Note 22
EU-3a	Funds for general banking risks	–	
4	Amount of the qualifying items referred to in Article 484, Section 3, and the corresponding share premium accounts subject to phase-out from CET1	–	
5	Minority interest (amount accepted in consolidated CET1)	–	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	544,988	Amount of eligible items referred to in Article 484(3) of the CRR
6	<b>Common Tier 1 capital before the regulatory adjustments</b>	6,274,535	
	Common equity tier 1: regulatory adjustments		
7	Additional value adjustments (negative amount)	-7,673	Deduction from Ordinary Tier 1 Capital of additional value adjustments of assets valued on the balance sheet at fair value, as determined in Art. 34 of the CRR and deductions not reflected in the accounts.
8	Intangible assets (net of related tax liability) (negative amount)	-209,706	Intangible assets (net of related tax liabilities) according to Articles 36(1)(b) and 37 CRR (negative amount)
10	Deferred tax assets that depend on future profitability excluding those deriving from temporary differences (net of the corresponding tax liabilities when the conditions established in Article 38, Section 3 CRR are met) (negative amount)	-2,694	
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	2,497	Note 22 of the notes to the Group's financial statements
12	Negative amounts resulting from the calculation of expected loss amounts	-236,340	
13	Any increase in equity that results from securitised assets (negative amount)	–	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	–	
15	Defined-benefit pension fund assets (negative amount)	–	
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	-33,282	
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the shareholders' equity of the institution (negative amount)	–	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	–	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	–	
EU-20a	Exposure amount of the following items which qualify for a RW of 1 250%, where the institution opts for the deduction alternative	–	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	–	
EU-20c	of which: securitisation positions (negative amount)	–	
EU-20d	of which: incomplete operations (negative amount)	–	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	–	
22	Amount exceeding the 17.65% threshold (negative amount)	–	

23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	–	
25	of which: deferred tax assets arising from temporary difference	–	
EU-25a	Losses for the current financial year (negative amount)	–	
EU-25b	Foreseeable tax charges relating to common equity tier 1 items, unless the bank adjusts the amount of common equity tier 1 items accordingly, to the extent that those tax charges reduce the amount by which those items can be used to cover risks or losses. (negative amount)	–	
27	Qualifying AT1 deductions that exceed the AT1 capital of the institution (negative amount)	–	
27a	Other regulatory adjustments	-5,907	
28	<b>Total regulatory adjustments to common equity tier 1 (CET1)</b>	<b>-493,104</b>	
29	<b>Common equity tier 1</b>	<b>5,781,431</b>	
	Additional tier 1 capital instruments		
30	Capital instruments and the related share premium accounts	798,741	Additional Tier 1 capital instruments, considered as on-balance sheet subordinated liabilities that meet the eligibility conditions set out in the CRR.
31	of which: classified as capital under applicable accounting standards		
32	of which: classified as liabilities under applicable accounting standards		
33	Amount of items referred to in Article 484 (4) CRR and the related share premium accounts subject to phasing out from additional tier 1 capital		
EU-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1		
EU-33b	Amount of items referred to in Article 494 (1) CRR and the related share premium accounts subject to phasing out from additional tier 1 capital		
34	Qualifying tier 1 capital included in consolidated AT1 capital (including minority interest not included in row 5) issued by subsidiaries and held by third parties		
35	of which: instruments issued by subsidiaries subject to phase-out		
36	<b>Additional tier 1 capital before regulatory adjustments</b>	<b>798,741</b>	
	Additional tier 1 capital: regulatory adjustments		
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)		
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the shareholders' equity of the institution (negative amount)		
39	Direct, indirect, and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
40	Direct, indirect, and synthetic holdings of the additional CET 1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
42	Qualifying tier 2 capital deductions that exceed the tier 2 instruments of the institution (negative amount)		
42a	Other regulatory adjustments to AT1 capital		
43	<b>Total regulatory adjustments to AT1 capital</b>		
44	<b>Additional Tier 1 Capital</b>	<b>798,741</b>	
45	<b>Tier 1 capital (tier 1 capital = common equity tier 1 + additional tier 1 capital)</b>	<b>6,580,172</b>	
	Tier 2 capital: instruments		
46	Capital instruments and the related share premium accounts	1,281,781	Tier 2 capital instruments, included under the statement of financial position heading of subordinated liabilities (2) that meet the conditions for eligibility set out in the CRR.
47	Amount of qualifying items referred to in Article 484(5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR		
EU-47a	Amount of qualifying items referred to in Article 494a(2) CRR subject to phase out from T2		
EU-47b	Amount of items referred to in Article 494b(2) CRR subject to phasing out from Tier 2 capital		

48	Qualifying shareholders' equity instruments included in consolidated T2 capital (including minority interest and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	
49	of which: instruments issued by subsidiaries subject to phase-out	
50	<b>Credit risk adjustments</b>	
51	<b>Tier 2 capital before the regulatory adjustments</b>	1,281,781
	Tier 2 capital: regulatory adjustments	
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)	
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the shareholders' equity of the institution (negative amount)	
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	
56b	<b>Other regulatory adjustments to tier 2 capital</b>	
57	<b>Total tier 2 capital regulatory adjustments</b>	
58	<b>Tier 2 capital</b>	1,281,781
59	<b>Total capital (total capital= tier 1 capital + tier 2 capital)</b>	7,861,953
60	<b>Total amount of risk-weighted exposure</b>	45,453,891
	Capital ratios and requirements including buffers	
61	Common equity tier 1	12.72%
62	Tier 1 capital	14.48%
63	Total capital	17.30%
64	Institution CET1 overall capital requirements.	8.36%
65	of which: capital conservation buffer requirement	2.50%
66	of which: countercyclical capital buffer requirement	0.48%
67	of which: systemic risk buffer requirement	0.15%
EU-67a	of which: buffer requirement for Global Systemically Important Institutions (G-SIIs) or Other Systemically Important Institutions (O-SIIs)	
EU-67b	of which: additional own funds requirements to address risks other than the risk of excessive leverage (%)	0.73%
68	<b>Common equity tier 1 capital (as a percentage of the risk exposure amount) available after meeting minimum capital requirements</b>	7.49%
	Amounts below the threshold for deduction (before risk-weighting)	
72	Direct and indirect holdings of shareholders' equity and eligible liabilities of financial sector entities where the institution does not hold a significant investment in such entities (amount below the 10% threshold and net of eligible short positions)	267,066
73	Direct and indirect holding of common equity tier 1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% threshold and net of eligible short positions)	290,607
75	<b>Deferred tax assets arising from temporary differences (amount below the 10% threshold, net of related tax liabilities, provided that the conditions set out in Article 38(3) CRR are fulfilled)</b>	192,023
	Applicable caps on the inclusion of provisions in tier 2	
76	Credit risk adjustments included in the tier 2 capital with respect to exposures subject to the standardised approach (before the application of the cap)	
77	Cap on inclusion of credit risk adjustments in Tier 2 under the standardised approach	

78	Credit risk adjustments included in T2 in respect of exposure subject to internal rating-based approach (before application of the cap)	
79	Cap for inclusion of credit risk adjustments in Tier 2 under the internal ratings-based approach	108,682
<b>Capital instruments subject to phase-out provisions (only applicable between 1 January 2014 and 1 January 2022)</b>		
80	Current cap on CET1 instruments subject to phase-out arrangements	
81	Excluded from CET1 due to cap (excess over cap after redemptions and maturities)	
82	Current cap on AT1 instruments subject to phase-out arrangements	
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	
84	Current cap on T2 instruments subject to phaseout arrangements	
85	Excluded from tier 2 due to cap (excess over cap after redemptions and maturities)	

Figures in thousands of euros

## Annex III. LI3: Outline of differences in consolidation groups (bank by bank)

a	b	Prudential consolidation method				g	h
Bankinter Group 2025	Accounting consolidation method	Full consolidation	Proportionate consolidation	Equity method	Not consolidated, not deducted	Deducted	Description of the entity
Bankinter Gestión de Activos, S.A., S.G.I.I.C.	Full consolidation	X					Asset Management
Hispanmarket, S.A.	Full consolidation	X					Holding and purchasing securities
Intermobiliaria, S.A.	Full consolidation	X					Real estate management
BK Consultoría, Asesoramiento y Atención Telefónica, S.A.	Full consolidation	X					Telephone assistance
BK Sociedad de Financiación, S.A.U.	Full consolidation	X					Issuance of debt securities
Bankinter Consumer Finance, E.F.C., S.A.	Full consolidation	X					Financial credit institution
Arroyo Business Consulting Development, S.L.	Full consolidation	X					No activity
Bankinter Global Services, S.A.	Full consolidation	X					Consulting
Bankinter Luxembourg, S.A	Full consolidation	X					Private banking
Bankinter International Notes, S.À R.L.	Full consolidation	X					Issuance of Structured Securities
Bankinter Investment, S.A.U.	Full consolidation	X					Investment banking
Bankinter Investment S.G.E.I.C., S.A.U.	Full consolidation	X					Management entity for alternative investments
Bankinter Seguros Generales, S.A. de Seguros y Reaseguros	Equity method			X			Insurance company
Bankinter Seguros de Vida, S.A. de Seguros y Reaseguros	Equity method			X			Insurance company
Olimpo Real Estate Socimi, S.A.	Equity method			X			Real estate investment trust
Atom Hoteles, Socimi, S.A.	Equity method			X			Real estate investment trust
Olimpo Real Estate Portugal, SIGI, S.A.	Equity method			X			Real estate investment trust
Montepino Logística, Socimi, S.A.	Equity method			X			Acquisition of logistics assets
Victoria Hotels & Resorts, S.L.	Equity method			X			Acquisition of hotel assets
Atrium Bire SIGI, S.A.	Equity method			X			Real estate investment trust
Palatino Residencial, S.A.	Equity method			X			Real estate investment trust
Universo, IME, S.A.	Equity method		X				Electronic money entity
Naviera Sorolla, S.L.	Full consolidation	X					Special purpose vehicle
Naviera Goya, S.L.	Full consolidation	X					Special purpose vehicle
Bankinter 13 Fondo de Titulización de Activos	Full consolidation	X					Special purpose vehicle