



Consolidated Non-Financial Information Statement

2021

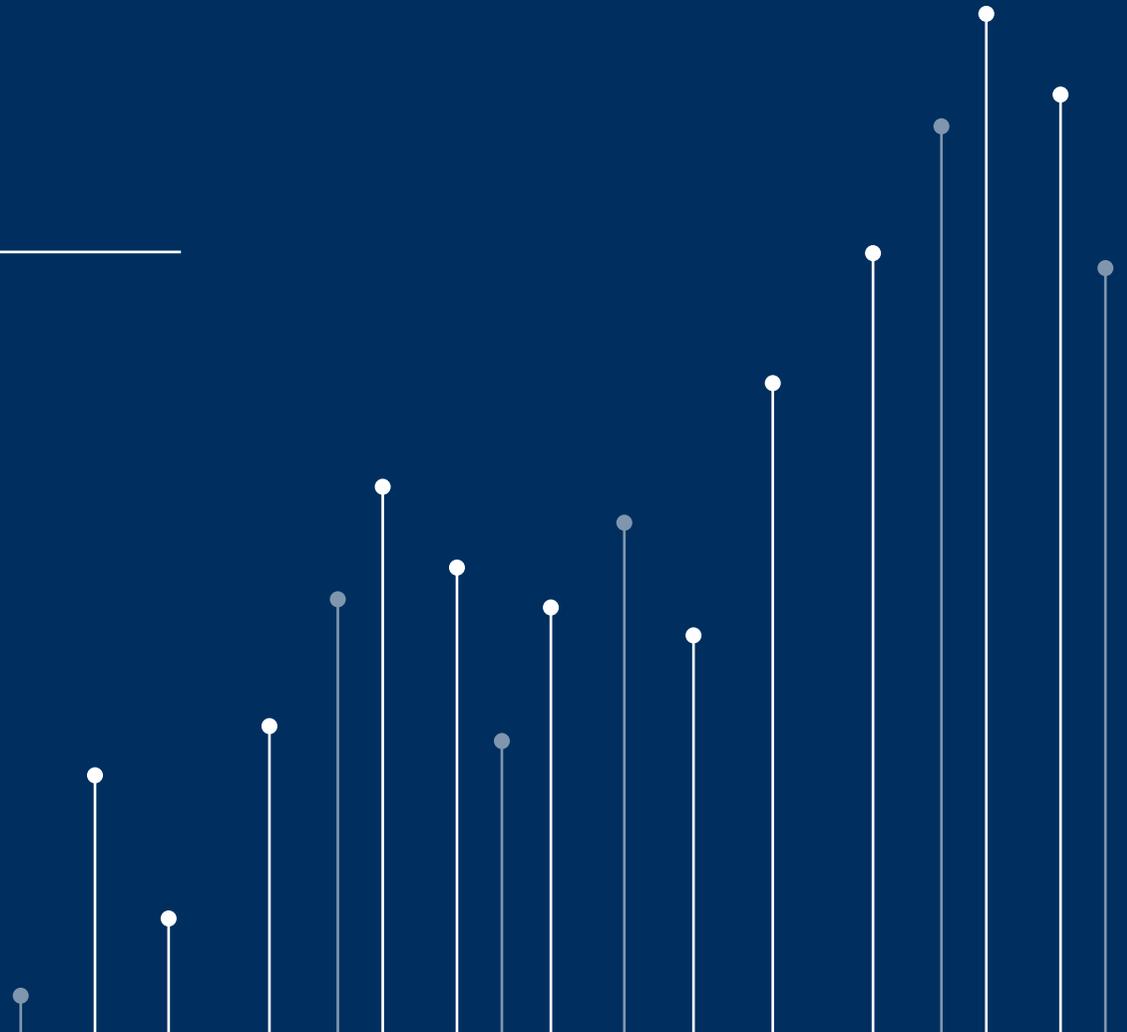




BOLSAS Y MERCADOS ESPAÑOLES, SOCIEDAD HOLDING DE MERCADOS Y SISTEMAS FINANCIEROS, S.A. -SINGLE SHAREHOLDER ENTITY- AND SUBSIDIARIES FORMING THE BOLSAS Y MERCADOS ESPAÑOLES GROUP [\(102-1\)](#)

CONSOLIDATED NON-FINANCIAL INFORMATION STATEMENT [2021](#)

Independent Expert Report



Independent Limited Assurance Report of the Non-Financial Statement for the year ended December 31, 2021

BOLSAS Y MERCADOS ESPAÑOLES, SOCIEDAD HOLDING DE MERCADOS Y SISTEMAS FINANCIEROS, S.A. - SINGLE SHAREHOLDER ENTITY AND SUBSIDIARIES FORMING THE BOLSAS Y MERCADOS ESPAÑOLES GROUP



Ernst & Young, S.L.
Calle de Raimundo Fernández Villaverde, 65
28003 Madrid
Tel: 902 365 456
Fax: 915 727 238
ey.com

INDEPENDENT LIMITED ASSURANCE REPORT OF THE CONSOLIDATED NON-FINANCIAL STATEMENT

Translation of a report originally issued in Spanish. In the event of discrepancy, the Spanish-language version prevails

To the Shareholder of Bolsas y Mercados Españoles Sociedad Holding de Mercados y Sistemas Financieros, S.A. - Sociedad Unipersonal:

Pursuant to article 49 of the Code of Commerce we have performed a verification, with a limited assurance scope, of the Consolidated Non-Financial Information Statement (hereinafter NFS) for the year ended December 31, 2021, of Bolsas y Mercados Españoles Sociedad Holding de Mercados y Sistemas Financieros, S.A. - Single Shareholder and subsidiaries (hereinafter, the Group), which is part of the Group's Consolidated Management Report.

The content of the NFS includes additional information to that required by prevailing mercantile regulations in relation to non-financial information that has not been subject to our verification. In this regard, our assignment has been exclusively limited to the verification of the information shown in chapter "Index of Non-financial information contents" of the accompanying Consolidated Management Report.

Responsibility of the Board of Directors

The preparation of the NFS included in the Consolidated Management Report of Bolsas y Mercados Españoles Sociedad Holding de Mercados y Sistemas Financieros, S.A. - Sociedad Unipersonal and its content is the responsibility of the Board of Directors of the Group. The NFS has been prepared in accordance with the contents required by the prevailing mercantile regulations, following the criteria of the Sustainability Reporting Standards of the Global Reporting Initiative (GRI standards), in conformity with the Essential option, as well as other criteria described in accordance with that indicated for each subject in chapter "Index of Non-financial information contents" of the accompanying Consolidated Management Report.

The Board of Directors is also responsible for the design, implementation and maintenance of such internal control as it may determine necessary to enable the preparation of an NFS that is free from material misstatement, whether due to fraud or error.

Furthermore, it is responsible for defining, implementing, adapting and maintaining the management systems from which the information necessary for the preparation of the NFS is obtained.

Our independence and quality control procedures

We have complied with the independence and other Code of Ethics requirements for accounting professionals issued by the International Ethics Standards Board for Accountants (IESBA), which is based on the fundamental principles of professional integrity, objectivity, competence, diligence as well as confidentiality and professional behaviour.

Domicilio Social: C/ Raimundo Fernández Villaverde, 65, 28003 Madrid - Inscrita en el Registro Mercantil de Madrid, tomo 9.364 general, 8.130 de la sección 3ª del Libro de Sociedades, folio 68, hoja nº 87.660-1, inscripción 1ª, Madrid 9 de Marzo de 1.989. A member firm of Ernst & Young Global Limited.



2

Our Firm complies with the International Standard on Quality Control No. 1 and thus, maintains a global quality control system that includes documented policies and procedures related to compliance with ethical requirements, professional standards, as well as applicable legal provisions and regulations.

The engagement team consisted of experts in the review of Non-Financial Information and, specifically, in information about economic, social and environmental performance.

Our responsibility

Our responsibility is to express our conclusions in an independent limited verification report based on the work performed. Our review has been performed in accordance with the requirements established in prevailing International Standard on Assurance Engagements 3000 "Assurance Engagements Other than Audits or Reviews of Historical Financial Information" (ISAE 3000 Revised) issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC) and the guidelines for verifying Non-Financial Statement, issued by the Spanish Official Register of Auditors of Accounts (ICJCE).

The procedures carried out in a limited assurance engagement vary in nature and execution timing and are smaller in scope than reasonable assurance engagements, and therefore, the level of assurance provided is likewise lower.

Our work consisted in requesting information from Management and the various Group units participating in the preparation of the 2021 NFS, reviewing the process for gathering and validating the information included in the NFS, and applying certain analytical procedures and sampling review tests as described below:

- ▶ Meeting with Group personnel to know the business model, policies and management approaches applied, the main risks related to these matters and obtain the necessary information for our external review.
- ▶ Analyzing the scope, relevance and integrity of the content included in the NFS for the year 2021 based on the materiality analysis made by the Group and described in section "4. Pillars of our Responsible Management" considering the content required by prevailing mercantile regulations.
- ▶ Analyzing the processes for gathering and validating the data included in the 2021 Non-Financial Statement.
- ▶ Reviewing the information on the risks, policies and management approaches applied in relation to the material aspects included in the 2021 NFS.
- ▶ Checking, through tests, based on a selection of a sample, the information related to the content of the 2021 NFS and its correct compilation from the data provided by the information sources.
- ▶ Obtaining a representation letter from the Board of Directors and Management.



3

Conclusion

Based on the limited assurance procedures conducted and the evidence obtained, no matter has come to our attention that would cause us to believe that the Consolidated NFS of Bolsas y Mercados Españoles, Sociedad Holding de Mercados y Sistemas Financieros, S.A. - Single Shareholder entity and subsidiaries for the year ended December 31, 2021 has not been prepared, in all material respects, in accordance with the contents required by the prevailing mercantile regulations, following the criteria of the Sustainability Reporting Standards of the Global Reporting Initiative (GRI standards), in conformity with the Essential option, as well as other criteria described in accordance with that indicated for each subject in chapter "Index of Non-financial information contents" of the accompanying Consolidated Management Report.

Use and distribution

This report has been prepared as required by prevailing mercantile regulations in Spain and may not be suitable for any other purpose or jurisdiction.

ERNST & YOUNG, S.L.

(Signature on the original in Spanish)

Héctor Martín Díaz

March 3rd, 2022

CONTENTS

LETTER FROM CHAIRMAN.	7	7.3. WELFARE AND OCCUPATIONAL HEALTH.	56
LETTER FROM THE CHIEF EXECUTIVE OFFICER.	9	7.4. TALENT ATTRACTION AND RETENTION.	61
1. BME AT A GLANCE	11	7.5. LABOUR RELATIONS.	66
2. COMPANY PROFILE	18	8. GENERATION OF A POSITIVE IMPACT ON SOCIETY	67
3. VALUE CREATION APPROACH	25	8.1. GENERATION OF A POSITIVE SOCIOECONOMIC IMPACT THROUGH THE ACTIVITY.	68
4. PILLARS OF OUR RESPONSIBLE MANAGEMENT	29	8.2. DISCLOSURE OF FINANCIAL KNOWLEDGE.	69
5. RESPONSIBLE GOVERNMENT	31	8.3. PROMOTION OF LOCAL DEVELOPMENT.	72
5.1. GOOD CORPORATE GOVERNANCE.	32	8.4. SUPPORT AND AFFILIATION TO ASSOCIATIONS.	73
5.2. ETHICS, INTEGRITY AND LEGAL COMPLIANCE.	37	9. THE DIFFERENTIAL VALUE OF GOOD ENVIRONMENTAL MANAGEMENT	74
5.3. RISK MANAGEMENT.	42	9.1. THE OPPORTUNITY OF ENVIRONMENTAL SUSTAINABILITY.	75
6. MAINTENANCE OF A SUSTAINABLE VALUE CHAIN	44	9.2. THE COMMITMENT TO GOOD ENVIRONMENTAL PERFORMANCE.	76
6.1. SUSTAINABLE SUPPLY CHAIN MANAGEMENT.	45	10. COVERAGE OF THIS REPORT	81
6.2. QUALITY AND SAFETY OF SERVICES PROVIDED.	48	INDEX OF NON-FINANCIAL INFORMATION CONTENTS	86
7. COMMITMENT TO PEOPLE	49		
7.1. MAIN FIGURES OF BME'S STAFF. (102-8, 405-1).	50		
7.2. COMMITMENT TO DIVERSITY AND EQUAL OPPORTUNITIES.	54		

Letter from Chairman [\(102-14\)](#)

As chairman of BME, I am pleased to present the company's Non-Financial Information Reporting Statement for the year 2021. As every financial year, this comprehensive report provides detailed information on BME's position in relation to sustainability, one of the company's inalienable principles.

BME plays a dual role in sustainability. On the one hand as a company, and on the other, as a manager of the financial markets. In both cases, we have reaffirmed our commitment. For BME, 2021 was the year in which the company has made progress in its integration within the SIX Group, which after this operation became the third-largest market infrastructure group in Europe. This union entailed important changes. It allowed us to be stronger and offer a better service to our customers and stakeholders thanks to the synergies resulting from the operation and the union of capacities and services, and also implied a boost for the financial ecosystems of Spain and Switzerland.

BME, as part of SIX, promotes a work environment in which there is no discrimination and where equal opportunities prevail for all its professionals, regardless of their gender, skin colour, culture, religion, nationality, age, orientation, or sexual identity. We also have an Internal Protocol of Action in cases of alleged labour and sexual harassment. Real equality of opportunity is a priority in our company.

As a financial markets manager, BME is determined to promote sustainable finance. Regulated markets, characterised by their transparency, fairness, security, liquidity, and rigor, are one of its best allies.



Jos Dijsselhof. BME Chairman

Spain continues to be in a central position in the issuance of sustainable bonds, such as the issues of green and sustainable bonds that were carried out by companies and Public Administrations, some of them directly linked to the response to the health crisis generated by the Covid-19 pandemic. On the other hand, sustainable finance does not only come down to the issuance of this type of bonds. Thus, in the field of Equities, investors also show a growing interest in following sustainability criteria.

Although the concept of sustainability has traditionally been more linked to environmental aspects, social challenges are also a very relevant axis. In this sense, BME has focussed especially on Gender Equality, seeking to contribute to the achievement of Goal 5 of the United Nations Sustainable Development Goals, since it is a fair goal and that, in addition, has a positive impact on society and the economy, since the most diverse and equal work environments are also more productive and successful.

Thus, to promote Gender Equality, BME launched in November 2021 the *IBEX Gender Equality Index*, which includes Spanish listed companies with the highest presence of women on the

Boards of Directors and in management positions. We hope that this launch will help generate debate and serve as a stimulus on the road to a more just and egalitarian society. It is a good example of the transformative power of financial markets and the role they can play in building a more sustainable future.

I would like to end this letter with a message of thanks to the entire BME staff, who once again have given their best to overcome all the challenges they have faced. Our professionals are the main value of BME and thanks to them we face the future with confidence.

I invite you to read all the details about BME's commitment to sustainability in this Non-Financial Statement of Information.

Thank you very much.

Jos Dijsselhof.

Letter from the Chief Executive Officer [\(102-14\)](#)

It is an honour for me to share with you some reflections on sustainability and its relevance for BME, for the markets in which it operates and for the ecosystem that it generates around it with each of its activities. The pandemic generated by Covid-19 has put sustainability at the centre of business and national strategies, while exponentially boosting sustainable finance.

For BME, engagement with each of its stakeholders is part of its purpose and an essential element of its operation. As a company, it works to reduce its environmental footprint, contributes to non-profit organisations, offers equal opportunities to its employees, and complies with a transparent and responsible policy with its suppliers.

But, in addition, due to its role as a market manager, it provides financing to companies, serves as a link between them and investors and makes its infrastructures available to public-private collaboration to improve the prosperity of citizens, taking advantage of its influence and visibility to support values linked to sustainability from any perspective.

In 2021, 22,000 million euros were channelled through BME markets to companies, a level that is double the figure of 2018. IPOs were especially significant in the renewable energy and digitalisation sectors.



Javier Hernani. BME CEO

Among other national and international initiatives through which BME channels its actions in this field are the Code of Good Tax Practices, to which the company adhered in 2010; the United Nations Global Compact, in which BME has been a collaborating company since 2011, or *sustainable Stock Exchanges* of the United Nations, of which it has been part since 2015. This commitment is reflected in the participation in different working groups, the support for the Sustainable Development Goals of the 2030 Agenda and the organisation of conferences such as the Bell Ringing for Gender Equality held in March or the Bell Ringing for Financial Education that took place in October.

This year, in addition, the training offer provided by Instituto BME was completed through the launch of Braindex. This new educational platform is 100% digital and is aimed without restrictions at the public as a means of mass dissemination.

BME has also continued to drive its commitment to sustainable finance. In 2021, in the field of fixed income, ESG bond issues gained special relevance, reaching 900 million euros, while operations with this label admitted to trading in BME's fixed income markets exceed 90,000 million. In equities, the launch of the first gender equality index in the Spanish market, the *Ibex Gender Equality*©, stood out.

BME has been presenting its Stakeholders with an Annual Corporate Social Responsibility Report since 2007, called the Consolidated Non-Financial Statement of Information since 2018. This report, which was prepared based on the international standards *Global Reporting Initiative -GRI-* (*) and Law 11/2018 of 28 December, aims to present the impact generated by the activities of the BME group and its companies in terms of sustainability.

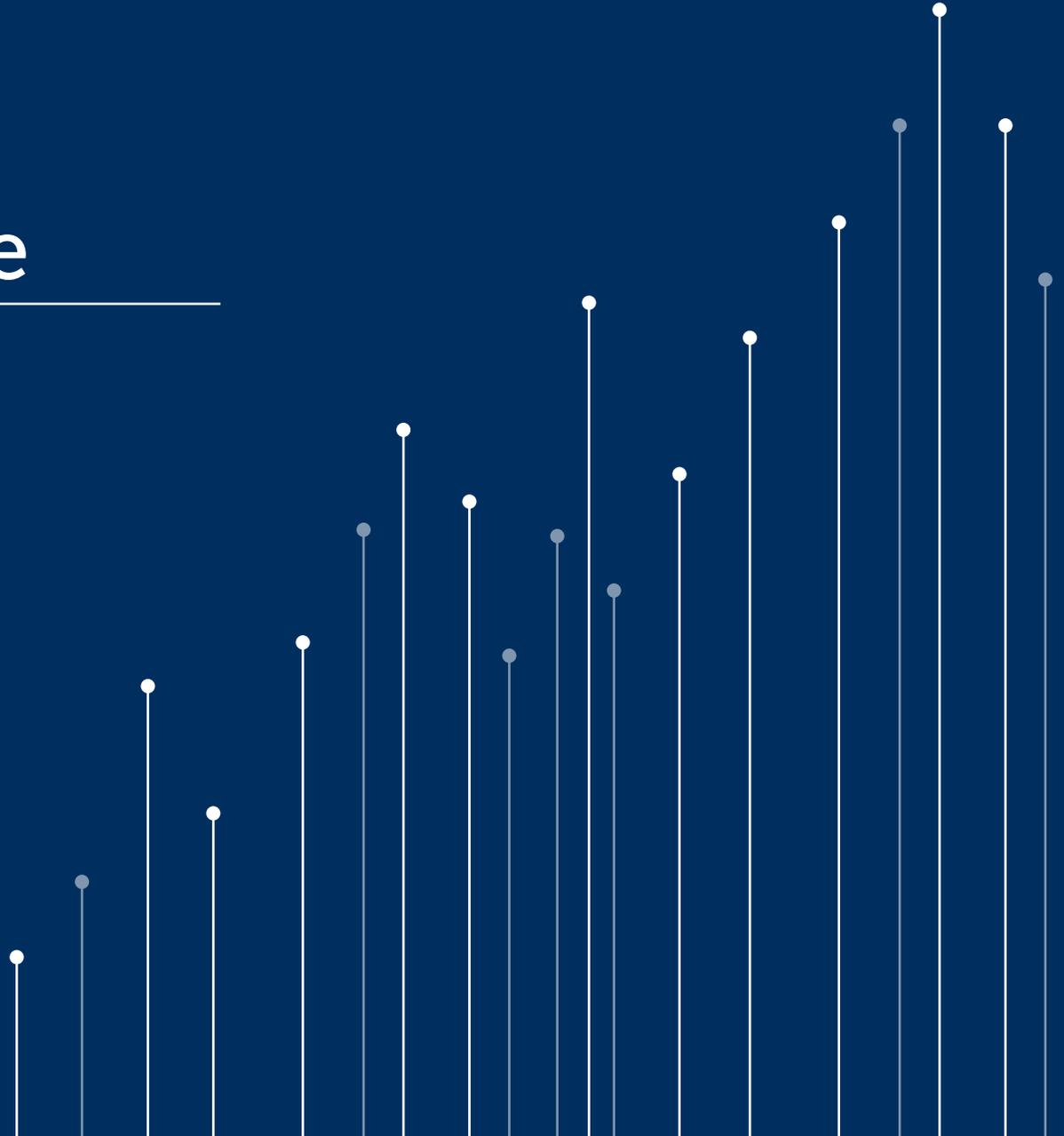
The contents of this Report were prepared based on the results of a Materiality Analysis, according to which economic performance, transparency and integrity in the operation and ethics and integrity were the aspects with the greatest impact on the company's ability to carry out its activities.

Kind regards,

Javier Hernani.

(*) *Global Reporting Initiative (GRI) is a non-governmental organisation whose purpose is to promote sustainability reports to improve their quality, rigour and usefulness through the implementation of the triple bottom-line approach: environmental, social and economic. To this end, the GRI publishes a methodology for the preparation of sustainability reports, which it frequently revises, the current version of which is implemented through the GRI Standards.*

1. BME at a glance



BME's mission and its differential approach. (102-2)

BME's mission is to be the benchmark for financial markets and systems in Spain, always seeking excellence in service quality and innovation in our services, giving value to society and the economy.

MAIN STRENGTHS OF BME.

**Solid and highly profitable
business model**



**Long-lasting and firm
relationships with main clients**



**Cutting-edge, efficient and
trustworthy technology**



**Highly qualified
personnel**



**Solid, trustworthy
brand**

Relevance achieved by the company in the markets in which it operates.

In the same way, BME assumes the commitment to be a benchmark for the economy of Spanish and Latin American companies, through Latibex, offering these companies notoriety and prestige and a stable market in which to finance themselves.

BME is committed to sustainability in the financial markets through transparency, the growth of organisations and financial education.

Main figures of BME in 2021. (102-7)

428,620 thousands of euros Economic value of the company	229,001 thousands of euros Economic value distributed to stakeholders	2,208 t of CO2 Indirect emissions
1,578 thousands of euros Investments related to sustainability	809 employees Total staff	35.01% Of senior management and middle management are women

Main stakeholders and their associated figures.

STAKEHOLDERS.



SUPPLIERS

91,41% of BME's suppliers are local.



COMPANY

17,1% and **49,9%** of the value of listed shares are held by Spanish households and foreign investors, respectively.



USERS

Outstanding stock market in Dividend Yield with **2.8%** in 2021 of listed companies (according to the MSCI developed market classification).



EMPLOYEES

66,75 hours/employee. Ratio of training hours received per employee, including language training.

BME has strengthened its position as a center for sustainable **sustainable finance** and **ESG** momentum



Summary of the main milestones of fiscal year 2021.

[Strengthening of BME as a centre for sustainable finance.](#) BME has placed sustainability at the centre of its general strategy in order to favour environmental, social and governance aspects in all its activities, and as a generator of financing that contributes to the prosperity of the economy and well-being of the citizens. In this sense, during the 2021 financial year, in the fixed income markets and platforms managed by BME, green, social and sustainable bond issues were admitted for trading, from all kinds of issuers, both public and private, with a total volume of 93,000 million euros, which confirmed its position as a benchmark in the field of sustainable financing. Particularly noteworthy is the admission to trading of the first green bond issued by the Spanish Treasury at 20 years for an amount of 5,000 million euros, in which the demand exceeded the volume issued by 12 times, which allowed the yield of the bond to be reduced to 1.034%. and reduce financing costs.

[Management of sustainability indices:](#) on 30 November, BME launched the IBEX Gender Equality®, the first index that brings together the most advanced Spanish listed companies in terms of gender equality according to the recommendations of the CNMV, and which corresponds to the Goal of Sustainable Development 5 of the United Nations 2030 Agenda. Likewise, since 2006 BME has made the FTSE 4Good IBEX® index available to investors.

[Commitment to financial education:](#) with the launch of Braindex, the *Massive Online Open Courses* platform, BME offers a 100% online training offer aimed at all types of students, regardless of their prior knowledge. The objective of this initiative is to promote financial and stock-market culture among citizens. As of 31 December 2021, the platform has 36 courses, 8 of which are free.

[Strategy “One Company: integration between SIX and BME”:](#) Following the purchase of all the shares of BME by SIX, the SIX-BME integration project designed to promote the stability and reliability of the market infrastructure as well as to creating value has reached several important milestones during the 2021 financial year, among which we highlight the following:

- The technical launch of the joint organisational structure on 1 April 2021, which was announced in January 2021;
- Access by BME Group employees to SIX's key tools, processes and systems through the SIX Group's internal website called i-connect;
- Cultural integration in order to promote open and transparent communication between the employees of SIX and BME, which has materialised, among other actions, through a survey in which 78% of the employees have participated from the SIX-BME group worldwide who have given their opinion on our corporate culture for the first time as an integrated company;
- The harmonisation of the internal legal framework of BME and SIX, which culminated in the approval of 16 internal directives and their annexes that entered into force on 1 November 2021, and 35 directives and their annexes that entered into force on 1 January 2022; and
- The implementation of the 9-level model of professional categories, which will be applied throughout the company from 1 January 2022, and other initiatives related to the integration of SIX and BME, which will be implemented until the end of 2024.



Some of BME's milestones in sustainability in 2021: first green issue by the Spanish Treasury and the Ringing of the Bell for Gender Equality held in March.

NATIONAL AND INTERNATIONAL INITIATIVES IN WHICH BME PARTICIPATES. (102-12)



UNITED NATIONS SUSTAINABLE STOCK EXCHANGES (SSE)

This initiative aims to improve performance in terms of ESG and promote sustainable investments, favouring collaboration between investors, companies, regulators, and competent international organisations in this field. In this sense, it positions itself as a global platform that aims to offer the necessary tools to maximise the role of responsible investment in sustainable development.

In furtherance of the commitment, BME promotes among issuers of securities and new companies listed on the markets and systems managed by BME the importance of reporting non-financial environmental, social and corporate governance information in their reports, as well as the issuance of bonds linked to sustainability.

Partner Exchange since 2015



UNITED NATIONS GLOBAL COMPACT

This initiative aims to promote business sustainability through the implementation of 10 Universal Principles of Conduct and Action in Human Rights and Business, labour standards, the environment and the fight against corruption in the strategy and daily operations of all types of entities and favour, in this way, the achievement of the Sustainable Development Goals.

BME fulfils its fundamental responsibilities in the areas of human rights, labour, the environment, and anti-corruption by incorporating the principles of the Global Compact into its strategies, policies and procedures, and establishing a culture of business integrity.

Joined since 2011



CODE OF GOOD TAX PRACTICES (CBPT)

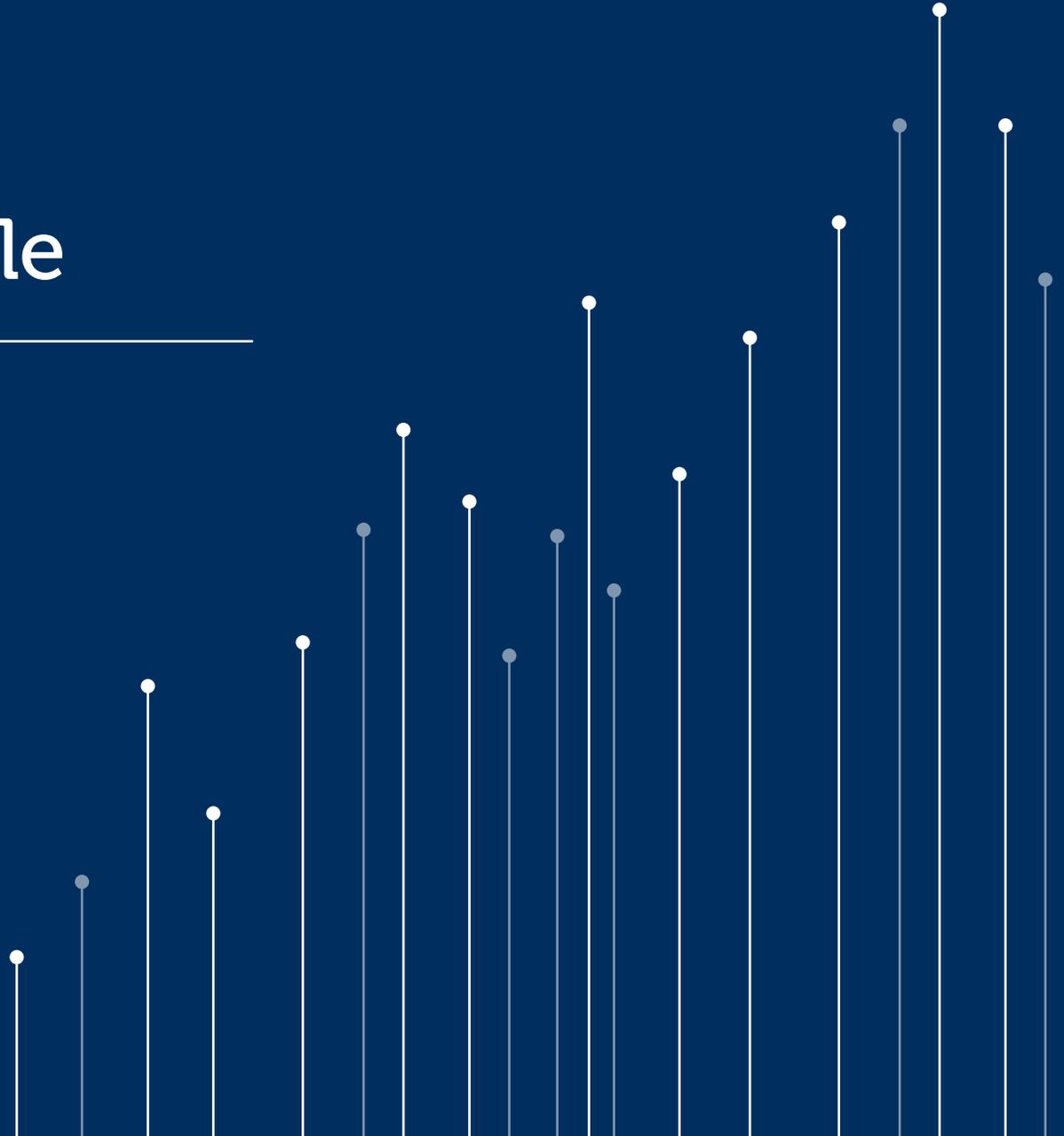
The objective of this Code is to promote a cooperative relationship between the Tax Agency and the BME Group companies that have signed it based on the principles of transparency, mutual trust, good faith and loyalty between the parties.

Practically all the BME group companies domiciled in Spain are individually adhered to the CBPT.

Adhered since 2010

2. Company profile

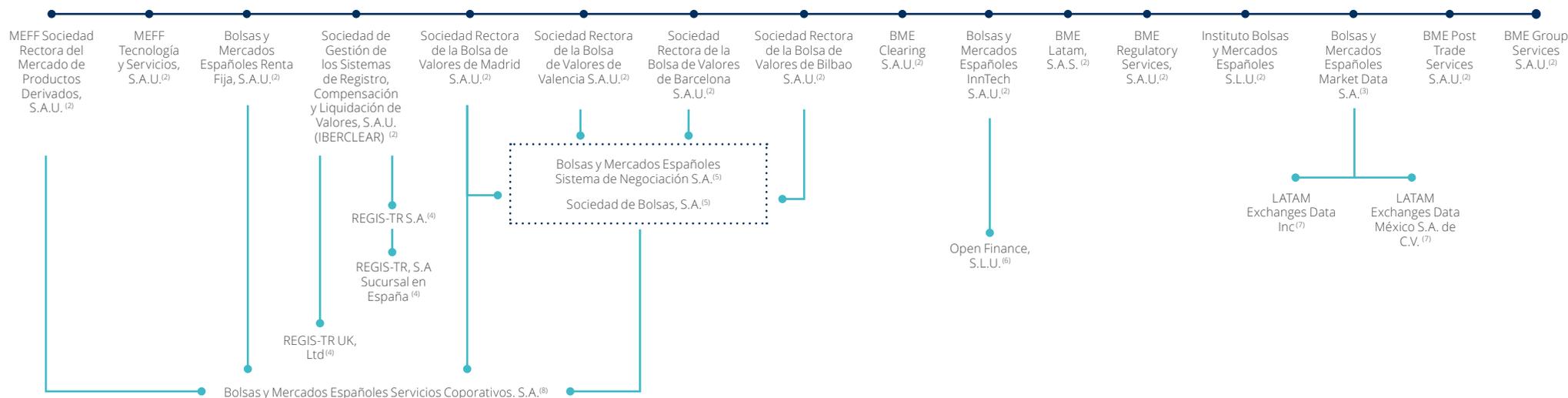
(102-4, 102-5, 102-6, 102-10)



CORPORATE STRUCTURE OF THE BME GROUP AND HOLDINGS IN OTHER COMPANIES. GEOGRAPHIC AREA OF ACTION.

SIX GROUP AG

BOLSAS Y MERCADOS ESPAÑOLES, SOCIEDAD HOLDING DE MERCADOS Y SISTEMAS FINANCIEROS, S.A.U. (BME) ⁽¹⁾



(1) SIX GROUP AG holds a 100% stake in the share capital of BME.

(2) BME holds a 100% stake in the share capital of MEFF Sociedad Rectora del Mercado de Productos Derivados, S.A.U., MEFF Tecnología y Servicios, S.A.U., Bolsas y Mercados Españoles Renta Fija, S.A.U., IBERCLEAR, Sociedad Rectora de la Bolsa de Valores de Madrid, S.A.U., Sociedad Rectora de la Bolsa de Valores de Valencia, S.A.U., Sociedad Rectora de la Bolsa de Valores de Barcelona, S.A.U., Sociedad Rectora de la Bolsa de Valores de Bilbao, S.A.U., BME Clearing, S.A.U., Bolsas y Mercados Españoles InnTech, S.A.U., BME Latam SAS, BME Regulatory Services, S.A.U., Instituto Bolsas y Mercados Españoles, S.L.U., BME Post Trade Services, S.A.U. and Bolsas y Mercados Españoles Group Services, S.A.U.

(3) BME, MEFF Sociedad Rectora del Mercado de Productos Derivados, S.A.U., Bolsas y Mercados Españoles Renta Fija, S.A.U., Sociedad Rectora de la Bolsa de Valores de Madrid, S.A.U., Sociedad Rectora de la Bolsa de Valores de Barcelona, S.A.U., Sociedad Rectora de la Bolsa de Valores de Bilbao, S.A.U., Sociedad Rectora de la Bolsa de Valores de Valencia, S.A.U. and Sociedad de Bolsas, S.A., respectively hold a participation of 49.71%, 7.77%, 0.14%, 10.09%, 9.93%, 9.93%, 9.93% and 2.5% of the share capital of the company Bolsas y Mercados Españoles Market Data, SA.

(4) IBERCLEAR holds a 50% interest in the share capital of REGIS-TR UK Ltd and REGIS-TR Société Anonyme, a company that created a branch in Spain.

(5) Sociedad Rectora de la Bolsa de Valores de Madrid, S.A.U., Sociedad Rectora de la Bolsa de Valores de Valencia, S.A.U., Sociedad Rectora de la Bolsa de Valores de Barcelona, S.A.U. and Sociedad Rectora de la Bolsa de Valores de Bilbao, S.A.U. hold a 25% stake in the companies Bolsas y Mercados Españoles Sistemas de Negociación, S.A. and Sociedad de Bolsas, S.A.

(6) Bolsas y Mercados Españoles InnTech, S.A.U. holds a 100% stake in the share capital of Open Finance S.L.U.

(7) Bolsas y Mercados Españoles Market Data, S.A., holds a 51% stake and a 49% stake in the share capital of LATAM Exchanges Data Inc and LATAM Exchanges Data México S.A. de C.V., respectively.

(8) MEFF Sociedad Rectora del Mercado de Productos Derivados, S.A.U., Bolsas y Mercados Españoles Renta Fija, S.A.U., IBERCLEAR, Sociedad Rectora de la Bolsa de Valores de Madrid, S.A.U. and Sociedad de Bolsas, S.A., respectively hold a participation of 11%, 9%, 21%, 48% and 11% of the share capital of the company Bolsas y Mercados Españoles Servicios Corporativos, SA.

After the acquisition by SIX (SIX GROUP AG) of the entire share capital of BME as a result of the Public Offer for the Acquisition of Shares formalised in financial year 2019, the Company began a gradual and progressive process of integration with SIX Group during financial year 2020 in which, jointly, the necessary actions were carried out to be able to configure the new organisational structure of the SIX-BME Group to be applied as from January 1, 2021, and to face new challenges that allow it to achieve a more solid position in an increasingly competitive and volatile environment in which to carry out its activity.

SHAREHOLDINGS IN GOVERNING COMPANIES OF THE LATIN AMERICAN FINANCIAL MARKETS, THE ENERGY MARKET AND OTHERS IN THE FINANCIAL SECTOR AS OF 31 DECEMBER 2021.

7,80 %	0,99 %	5,65 %	5 %	11,27 %
Cámara de Riesgo Central de Contraparte de Colombia, S.A through BME	Bolsa Mexicana de Valores, S.A. de Capital Variable through BME	Operador del Mercado Ibérico de Energía – Polo Español, S.A. (OMEL) through BME Inntech	OMIP Operador do Mercado Ibérico (Portugal), SGPS, S.A through BME	Noster Finance, S.L. (Finect) through BME

BME, which has the legal form of a public limited company, is the operator of all securities markets and financial systems in Spain, mainly carries out its activity in this country for the users and clients described in the business model included in chapter 3 of this report. [\(102-4, 102-5\)](#)

The corporate and operational headquarters of BME and of all the Group companies (with the exception of Regis-TR, SA, Regis-TR UK, Ltd, BME Latam SAS, LATAM Exchanges Data Inc – hereinafter LED – and LATAM Exchanges Data México SA de CV – hereinafter LED Mexico –) are located in Spain, with BME’s headquarters in Madrid, at Plaza de la Lealtad 1, and the organisation’s main operational headquarters in Las Rozas (Madrid), on Calle Tramontana 2a. The corporate operations carried out during the 2021 financial year have not entailed changes in the registered office or in the operational headquarters of BME, although a company has been incorporated, BME Group Services, S.A.U. [\(102-3, 102-10\)](#)

Mission and values.



Mission and objectives

The mission of BME is to be the leading company for financial markets and systems in Spain, always striving to achieve service excellence and constantly innovate in markets and services. We also aim to create value for society and our shareholders.

The main objective of BME is to place the client at the heart of all corporate decisions and maximise the relationship with them in a manner so that excellence and the provision of the best service continue to be distinguishing features and BME's most recognisable hallmark.

BME also drives the significant increase in its revenue through organic and inorganic growth, increased geographic diversification and services, the strengthening BME's solid business model by adapting it to the new environment and customer equity.



Distinguishing values

BME is a leader in the sector in terms of solvency, efficiency and shareholder returns. BME is a company recognised for its impartiality, transparency and protection, it is a dynamic and modern company committed to customer service, innovation and development, using technology developed in-house that has been exported to several other countries.

BME Corporate Areas and Business Units.

The BME Business Units detailed below are coordinated through the following five corporate areas which, as of 1 January 2021, are common to both organisations:

CORPORATE AREAS DURING THE YEAR 2021.

Finance & Services

Human Resources

Technology (IT)

Marketing & Communications

Risk, Legal and Compliance

Given the corporate structure of the BME Group, the management of activities is organised through the following seven (7) Business Units, which are integrated into four (4) SIX Business Units:

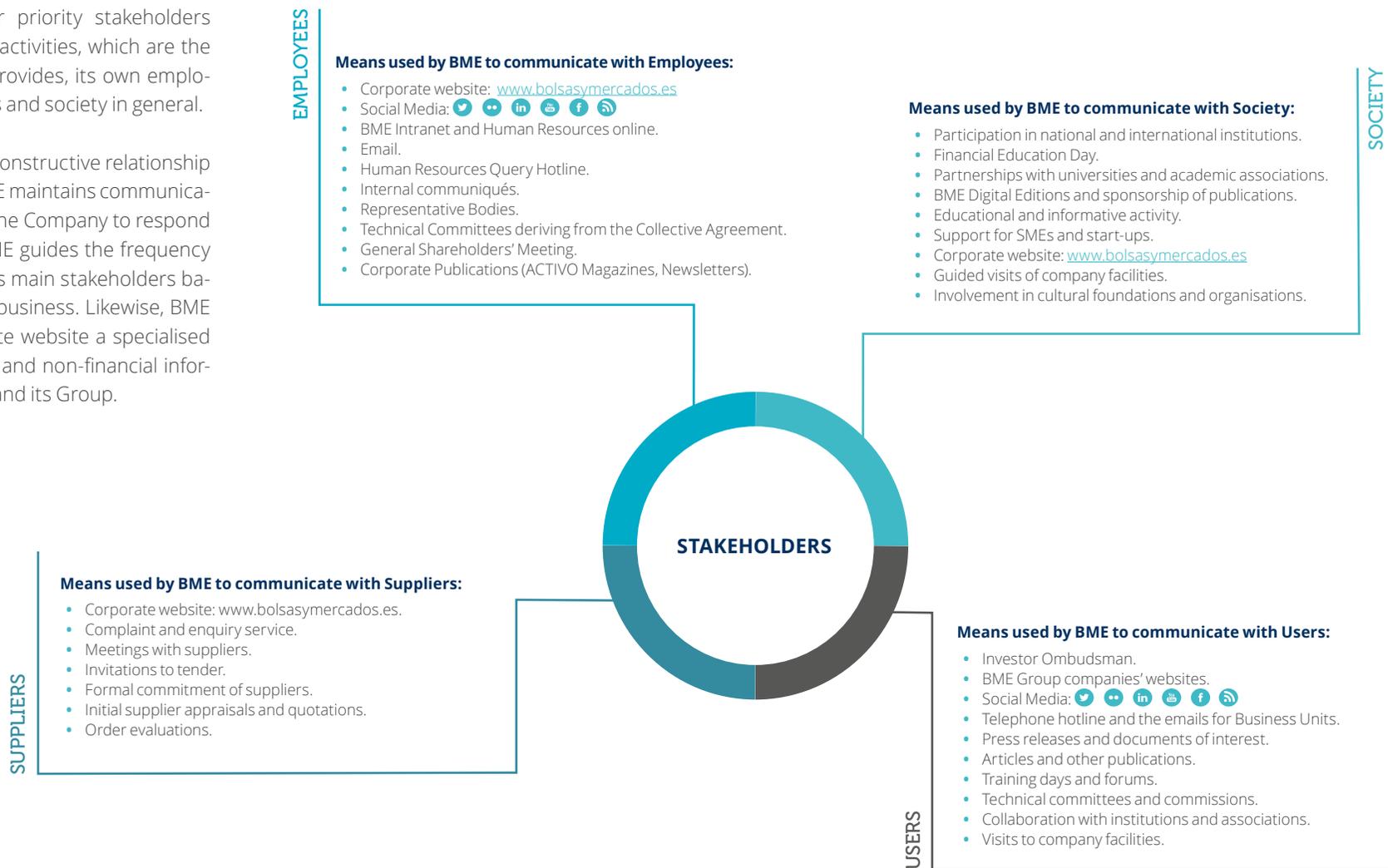
BUSINESS UNITS.

BME business units as of 31 december, 2021		SIX business units as of 31 december, 2021
	Fixed Income: Trading of private fixed-income and public debt securities as well as listing and maintenance services for issuers on the private fixed-income market.	Exchanges: It is made up of the Swiss Stock Exchange (base of the Swiss financial centre that performs its functions through Global Sales & Relationship Management, Primary Markets, Products, Trading Operations and Change Delivery); BME Exchange (core of the Spanish fixed and variable income financial market); MEFF (official financial futures and options market in Spain); SIX Digital Exchange (digital market infrastructure offering integrated, end-to-end trading, settlement and custody service for digital assets); and Business Management & Services (covering quality control of projects related to this business unit).
	Equities: Trading of securities through the electronic trading platform (Sistema de Interconexión Bursátil) and floors as well as listing and maintenance services for issuers on the equity markets.	
	Derivatives: Arrangement of derivatives by electronic means.	
	Market Data: Primary information, index use licences and other, related access and connectivity and regulatory compliance services.	
	Clearing: Clearing and central counterparty activities for equities, financial derivatives, government debt repos, interest rate derivatives and electricity and gas derivatives.	Securities Services: This Unit (through the Securities Finance --SIX Trade Repository, SIX-SIS, Iberclear, SIX x-clear and BME Clearing) is responsible for the provision of post-trade services of the SIX Group to increase efficiency, quality and innovation throughout the post-contracting value chain.
	Settlement and Registration: Registration and settlement of equity, private fixed-income, and public debt trades. Shareholder Register Services, Issuing Agent Services, RENADE and BME Securities Solutions.	
	Value-Added Services: Technological innovation, financial, consulting and infrastructure services; global access services and algorithmic trading.	
	(-)	Banking Services: It operates, develops and digitises business and private payments for the Swiss financial centre through IT management, products and solutions, business risk management and strategic and business development.

Stakeholders. (102-33, 102-40, 102-42, 102-43)

BME has identified four priority stakeholders for the Company and its activities, which are the users of the services it provides, its own employees, its service providers and society in general.

In order to strengthen a constructive relationship with its stakeholders, BME maintains communication channels that allow the Company to respond to their expectations. BME guides the frequency in the relationship with its main stakeholders based on the needs of the business. Likewise, BME maintains on its corporate website a specialised website on sustainability and non-financial information on the Company and its Group.



The Board of Directors, through the approval of this report, collects those relevant issues that have arisen in the relationship and communication of the Company with its stakeholders and the departments involved in its relationship with them. This consolidated, non-financial information statement was prepared based on the analysis previously carried out in which the most relevant aspects for the Company and its stakeholders were identified, addressing, among others, economic, social and environmental issues.

VALUE GENERATED BY BME FOR ITS STAKEHOLDERS.



Society

It constitutes a channel of financing and liquidity for companies, fosters society's trust in the financial system by guaranteeing the proper functioning of the markets and assumes the commitment to be an outstanding reference in the economy of Spanish companies and, through Latibex, Latin American.



Users

It offers its users a wide range of products, services and systems, based on stable and self-developed technology that adapts to their needs. BME also provides access to global markets to issuers, brokers and investors both in Spain and internationally, with clients in Europe, America and Africa.



Employees

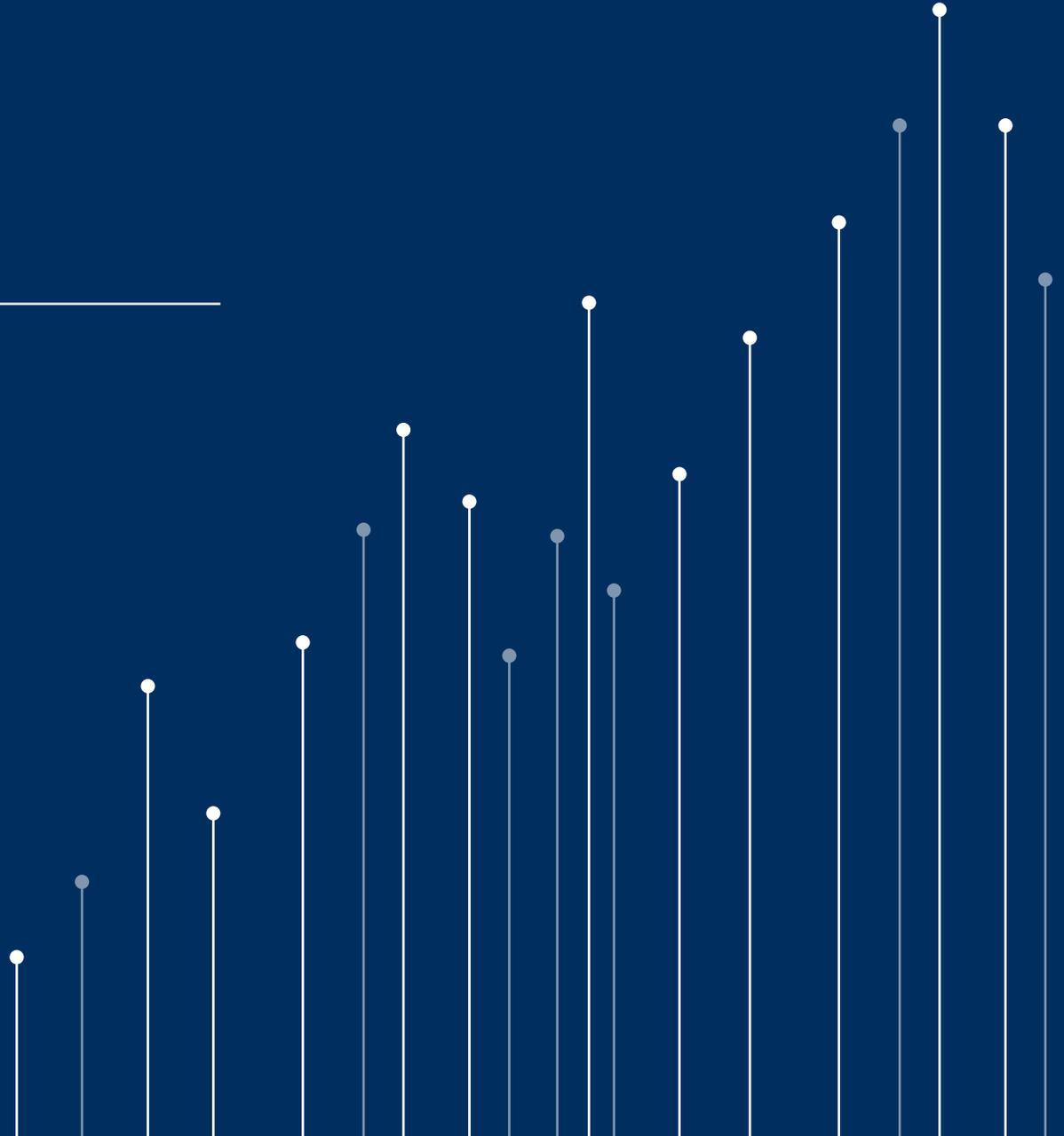
Promotes the professional and personal development of its employees through the constant improvement of the services and activities provided to them, its training programs and professional promotion.



Suppliers

Generate business among its suppliers – in general, locally.

3. Value creation approach (102-2)



The BME Group integrates the Spanish securities registration, clearing and settlement systems, the central counterparties, the secondary securities markets, and the Spanish multilateral trading systems. Likewise, it develops a wide range of complementary and auxiliary services, which cover, among others, the areas of information, consultancy, IT, contingency and business continuity and training.

BME as a centre for sustainable finance.

We are at a time of key transformation of the financial system where sustainable finance is becoming increasingly important in the eyes of investors, companies and society. Investors have a crucial role in accelerating the transition to a more sustainable economy by seeking to focus their investments on assets that contribute positively to this transition.

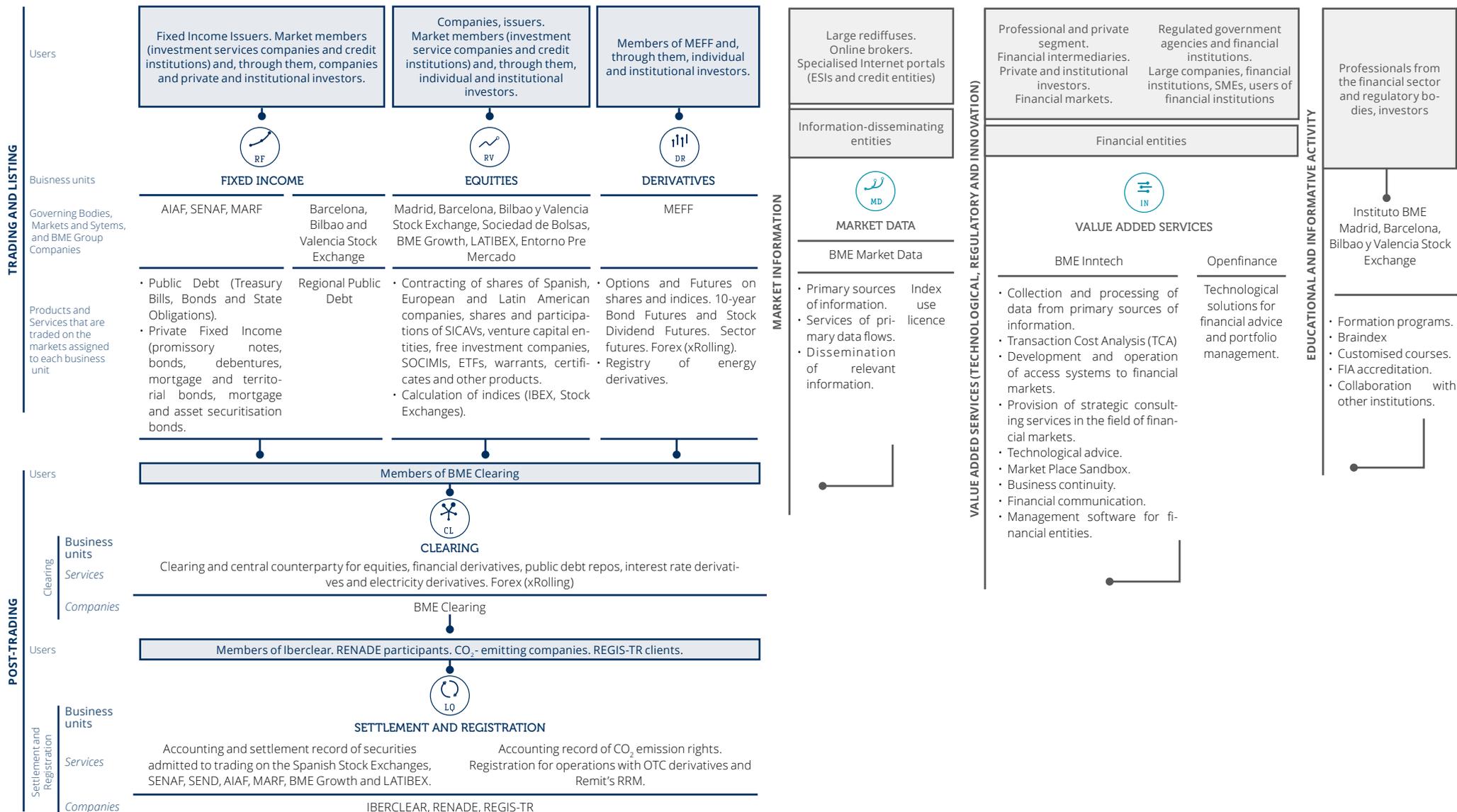
BME, aware of this great opportunity that contributes to the prosperity of the economy and the well-being of citizens, seeks to position itself as a facilitator and benchmark in this field in Spain, promoting the large-scale development of sustainable financing, not only as a manager of capital markets but also as a company, since it forms part of numerous national and international initiatives and working groups, such as Sustainable Stock Exchanges (SSE), the United Nations Global Compact, the Spanish Sustainable Financing Observatory (OFISO) or “Finanzas For Everyone”, which seek to promote sustainability and good corporate governance in the world and in Spain.

In this way, BME places sustainability at the centre of its strategy in general and for all its stakeholders, to favour in all its activities, among other issues, equal opportunities, the prosperity of people and the protection of the planet, in line with the Sustainable Development Goals and the United Nations 2030 Agenda. [\(102-15\)](#)

BME Business Model.

The following table schematically represents the structure and operation of BME's business model, highlighting the main products and services offered by each BME's business unit to end users and recipients. From a more general perspective, in addition to these specific products and services, BME attaches special importance to training activities within its business model, as it makes it easier for end users and customers to have at their disposal the necessary and sufficient knowledge to achieve its objectives with the greatest guarantee, transparency and security, contributing to the strengthening of the BME Group's activity.

BME BUSINESS UNITS AND TRAINING ACTIVITY.



The resources necessary for BME to carry out the activities described in the business model are centred on its human resources, the constant development of its own knowledge and technology and the strengthening of the relationship with suppliers and users.

Strategic plan.

Financial year 2021 was the last year in which BME's 2019–2021 Strategic Plan was in force, which has now been integrated into SIX's Strategic Plan, which included the main objectives of diversifying its revenues, accelerating growth and the maintenance of profitability and which included as fundamental pillars the solid business model adapted to the environment, the expectations of organic and inorganic growth, the increase in geographic diversification and service and the promotion of its business segments.

Economic value generated, distributed and retained. (201-1)

ECONOMIC VALUE GENERATED, DISTRIBUTED AND RETAINED. (THOUSANDS OF EUROS)⁽¹⁾

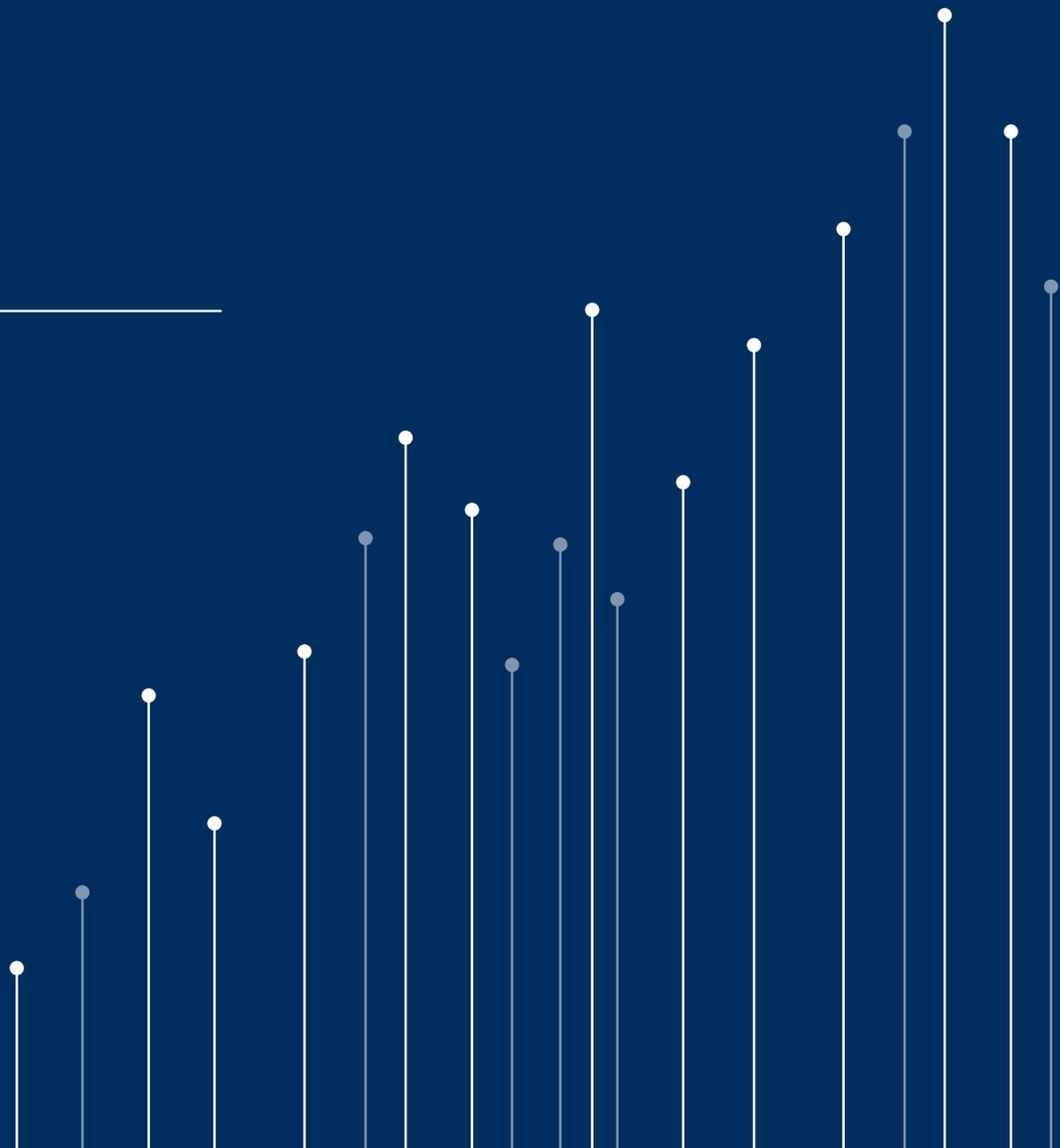
	2020	2021
Economic Value Generated	306,653	282,061
Net revenue	301,113	274,709
Other net gains (losses) ⁽²⁾	5,540	7,351
Economic Value Distributed	306,558	229,001
Operating expenses	54,794	37,885
Staff costs	72,956	73,676
Dividends	135,149	75,254
Income tax and other taxes ⁽³⁾	42,798	41,294
Payments to public bodies, donations and other investments in the community	861	892
Economic value retained (profit not distributed)	95	53,060
Reserves	-12,301	37,284
Amortisation and depreciation	12,396	15,775

(1) The balance of net revenue for fiscal years 2020 and 2021 includes the net turnover after deducting the "variable direct costs of operations", the inclusion of which in the consolidated income statement under Revenue and from which it is then subtracted, is imposed by CNMV Circular 5/2016 of 27 July on accounting standards, reserved and public disclosure, and financial statements.

(2) Includes the work performed by the company on own assets, other operating revenue, the share of profit (loss) of companies accounted for using the equity method and the net financial result, minus the result attributed to external partners.

(3) Includes only Income Tax and taxes reported in the year.

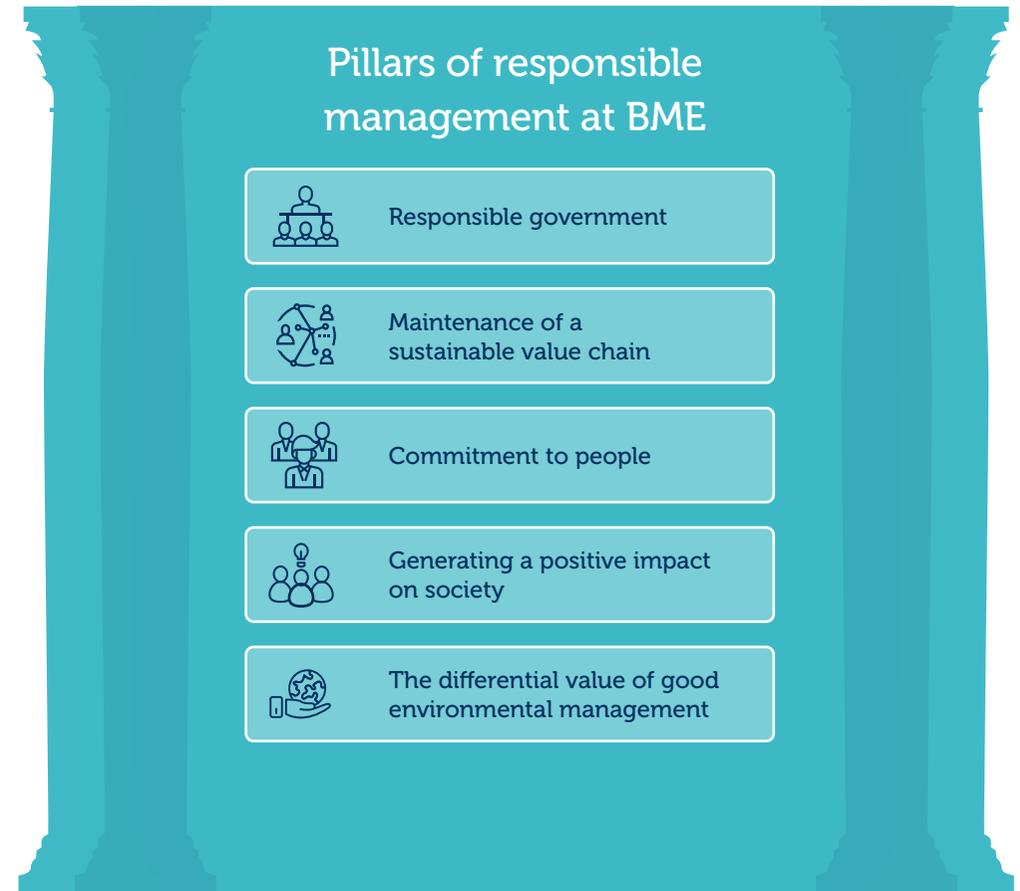
4. Pillars of our responsible management



To ensure this long-term sustainable business model, it is essential to identify the most relevant aspects for the BME Group, both in terms of internal and external priority, in relation to its stakeholders. Therefore, since 2016 the Company has been conducting a materiality analysis that has allowed it to identify the key environmental, social and good governance issues that are particularly important because they are related to its activity and are likely to generate positive and/or negative impacts (see section 10, Scope of this report, for more details on the materiality analysis and matrix).

Based on these issues, BME was able to structure its business management around 5 pillars whose efficient coordination allows the generation of value for the company, its stakeholders and society.

Each of them will be developed in depth throughout this report.



5. Responsible government

- 5.1. Good corporate governance.
- 5.2. Ethics, integrity and legal compliance.
- 5.3. Risk management.



BME, as the management company of the Spanish financial markets and systems, is the meeting point between companies and investors, both national and foreign, as it is the channel through which savings resources are channelled towards financing companies and as such, it provides the markets and systems it manages with the greatest speed, reliability, transparency, efficiency, safety and sustainability, and strictly complies with current regulations and, in particular, with economic, social and environmental regulations, internal codes and good practices applicable to the sector, as well as to the external codes to which they have voluntarily adhered.

BME's corporate social responsibility and its policy which is available in the Corporate Information section of the corporate website www.bolsasymercados.es is integrated into its general strategy and into the day-to-day management of the BME Group, which transmits all the relevant information on the financial and non-financial aspects of its activities.

BME GROUP AND RESPONSIBLE MANAGEMENT IN FIGURES.



Composition of the Board of Directors



1/3 of independent directors



1/3 of women



No significant legal proceedings for unfair competition practices



No communication in the electronic mailbox of the Internal Complaints Channel

Responsible management within the BME Group is based on three fundamental axes that will be detailed below: respect for and alignment with the best practices of good corporate governance, a firm commitment to ethical management and regulatory compliance, and finally proper management of risks that will strengthen the long-term resilience of the business.

5.1. GOOD CORPORATE GOVERNANCE. (102-18, 102-22, 102-23, 405-1)

A) BME's management bodies.

As of 31 December 2021, the Board of Directors, the highest governing and administrative body of the Company and in charge of approving the corporate social responsibility policy, has been made up of 6 members of recognised capacity, honorability and independent criteria.

The professional records of the members of the Board of Directors, which are available on the corporate website www.bolsasymercados.es, detail the positions and activities they carry out in the companies in the BME group and other companies outside the Group. The directors classified as external proprietary directors, who account for 50% of the directors, represent the sole legal entity shareholder that holds a 100% stake in the Company's share capital, SIX Group AG. (102-20, 102-5)

COMPOSITION OF THE BOARD OF DIRECTORS AS AT 31 DECEMBER 2021.

Directors	Position on the Board	Character	Length of service on the Board	Committees	
				Audit and Risk Committee	Audit Remuneration Committee
Mr Jos Dijsselhof	Chairman	External proprietary	18.06.2020	-	Member
Mr David María Jiménez-Blanco Carrillo de Albornoz	Deputy Chairman	External Independent	26.04.2018	Member	Chairman
Mr Javier Hernani Burzako	Chief Executive Officer	Executive	27.04.2017	-	-
Ms Marion Leslie	Director	External proprietary	30.07.2020	-	-
Ms Belén Romana García	Director	External independent	30.07.2020	Chairwoman	Member
Mr Daniel Schmucki	Directors	External proprietary	18.06.2020	Member	-

Secretary of the Board and of the Committees: Mr Luis María Cazorla Prieto
Deputy Secretary of the Board and of the Committees: Ms Cristina Bajo Martínez

DIRECTORS OF BME BY SEX AND AGE AS OF DECEMBER 31 OF EACH FISCAL YEAR.

	2020	2021
Women	2	2
Men	4	4
< 30	0	0
30 - 50	1	0
> 50	5	6

Among the delegated committees of the administrative body is the Appointments and Remuneration Committee and the Audit and Risks Committee, which is responsible, among other matters, for evaluating those matters related to the non-financial risks of the Company, including operational, technological, legal, social, environmental, political and reputational, as well as coordinate the reporting process of non-financial information. (102-19, 102-20)

Information on corporate governance is available in the “Corporate Information” section of the corporate website.

During the 2021 financial year, no specific anti-corruption training was given to the members of the Board of Directors of BME; notwithstanding the foregoing, the directors of BME received training in the exercise of their own functions in the development of the meetings of the Board of Directors and its Delegate Committees, in which they were trained in the matters that affect the Company through the reports and other documents that are presented to the management bodies and the presentations made by internal experts who attend the meetings expressly for the development of the aforementioned matters. (205-2)

b) BME Organisation.

The Board of Directors has entrusted the management of ordinary business to its executive members and the senior management team, who are responsible for promoting, directing and supervising those matters of particular importance to the Company.

For these purposes, the Company has a Chief Executive Officer, who is the chief executive of BME and who is responsible for managing the ordinary business of the Company with the highest executive functions. Likewise, the senior management of BME is made up of the General Secretary, Mr Luis María Cazorla Prieto, and the members of the Management Committee, which reports hierarchically to the CEO. (102-23)

The BME Management Committee, which is the body that exercises direct supervision of the management of the Business Units, guarantees their coordinated action with the corporate areas, as well as the activities carried out by the Company and the companies in its Group. As of 31 December 2021, the composition of the Management Committee was as follows:

MANAGEMENT COMMITTEE ON 31 DECEMBER 2021. ⁽¹⁾

Ms Marta Bartolomé Yllera (CFO)

Ms Beatriz Alonso-Majagranzas Cenamor (Markets and Market Information Director) ⁽²⁾

Mr José Manuel Ortiz Repiso Jimenez (Clearing Director)

Mr Jesús Benito Naveira (Settlement and Registry Director)

Ms Berta Ares Lombán (Value-Added Services Director)

Mr Ignacio Olivares Blanco (Legal Affairs Director)

Mr Arturo Merino Ginés (IT Director)

Mr Pablo Malumbres Muguerza (Corporate Communication and Public Affairs Director)

Mr Jorge Yzaguirre Scharfhausen (Deputy Head Securities Services Business Unit)

Mr Luis García Berral (Human Resources Director) ⁽²⁾

(1) Mr Javier Hernani Burzako, CEO and chief executive of BME, heads the Management Committee.

(2) They regularly attend the meetings of the Management Committee without being members of it.

MEMBERS OF THE BME MANAGEMENT COMMITTEE BY SEX AND AGE AS OF 31 DECEMBER OF EACH FISCAL YEAR. (*)

	2020	2021
Women	2	2
Men	6	6
< 30	0	0
30 - 50	4	5
> 50	4	3

(*) During the 2021 financial year, the following senior management appointments and resignations took place: (i) Mr Francisco Nicolás Tahoces resigned due to retirement as Director of Technology on 15 January 2021, and (ii) Mr Arturo Merino Ginés was appointed Director of Technology on 26 February 2021, joining the Management Committee on this date.

C) Remuneration of the Board of Directors and Senior Management of BME (102-35, 102-36, 102-37)

The Remuneration Policy for BME directors, which is approved by the sole shareholder, is transparent, reasonably proportionate to the importance of the Company, its economic situation and the market standards of comparable companies, and is compatible and aligned with the business strategy, values and long-term interests of the Company and in a way that promotes the long-term profitability and sustainability of BME.

For its part, the Remuneration Policy of the BME Group, which was approved by the Board of Directors at its meeting on 29 November 2017 at the proposal of the Appointments and Remuneration Committee, is applicable to all persons who maintain an employment relationship with BME or with any of the companies that make up the Group and those persons who, as a result of their status as members of the administrative bodies of BME Group companies with executive powers, have their employment relationship with any of the Group companies suspended.

AVERAGE GROSS REMUNERATION OF THE DIRECTORS AND SENIOR MANAGEMENT OF BME BY GENDER. (4) (THOUSANDS OF EUROS)

	2020	2021
Directors	480 (2)	519 (3)
Women	45	106
Men	698	726
Senior Management (4) (5)	474	413
Women	467	392
Men	475	419

(1) The average remuneration of directors and senior management of BME contained in this table includes all remuneration items received by directors, both in their capacity as such and for the executive functions they perform at BME, and members of senior management (including allowances, compensation and settlements for termination of the employment relationship and any other remuneration received, except the estimate or target of the variable remuneration for the year 2021). Likewise, for the calculation of the average remuneration of senior management, the number of days that the worker has belonged to the senior management of BME during the year, the daily remuneration received during said period and the number of members of senior management during the year.

(2) During the 2020 financial year, the following resignations and additions to the Board of Directors materialised: (i) Mr Juan March Juan, Mr Santos Martínez-Conde y Gutiérrez-Barquín and Mr Ignacio Garralda Ruiz de Velasco tendered their resignation as directors on 18 June 2020; (ii) Mr Johannes Dijsselhof and Mr Daniel Schmucki were appointed directors on 18 June 2020; (iii) Mr Antonio J. Zoido Martínez, Ms María Helena dos Santos Fernandes de Santana, Ms Ana Isabel Fernández Álvarez, D. Joan Hortalá i Arau, D. Isabel Martín Castilla, and Mr Juan Carlos Ureta Domingo resigned due to termination on 30 July 2020; (iv) Ms Marion Leslie and Mrs Belén Romana García were appointed Directors on 30 July 2020. (v) Mr Johannes Dijsselhof, Mr Daniel Schmucki, Mr Javier Hernani Burzako and Mr David María Jiménez-Blanco Carrillo de Albornoz were ratified and re-elected directors on 30 July 2020, and on that same date Mr Johannes Dijsselhof was appointed Chairman of the Board of Directors, Mr David María Jiménez-Blanco Carrillo de Albornoz was appointed Vice Chairman and Mr Javier Hernani Burzako CEO.

(3) During the 2021 financial year, the composition of the Board of Directors has not undergone any changes, being the following directors: Mr Jos Dijsselhof (Chairman), Mr David María Jiménez-Blanco Carrillo de Albornoz (Vice-Chairman), Mr Javier Hernani Burzako (Director Delegate), Ms Marion Leslie (Director), Ms Belén Romana García (Director) and Mr Daniel Schmucki (Director).

(4) BME's senior management is made up of the Secretary General (Mr Luis María Cazorla Prieto), the CEO and chief executive (Mr Javier Hernani Burzako) and the members of the BME Management Committee. During the 2021 financial year, the following appointments and resignations took place in BME's senior management: (i) Mr Francisco Nicolás Tahoces resigned as Technology Director and member of the Management Committee on 15 January 2021, and (ii) Mr Arturo Merino Ginés was appointed Technology Director on 26 February 2021, joining the Management Committee on this date.

(5) The amount of the average remuneration received by senior management does not include the average remuneration of the CEO and chief executive for his executive functions, as it was included together with the average remuneration received as Director.

Governance is one
of **BME's pillars** in all
its activities and with all its
stakeholders



5.2. ETHICS, INTEGRITY AND LEGAL COMPLIANCE. (102-16)

Ethics, integrity and legal compliance at BME are the main axes on which it has based its commitment to its stakeholders. For these purposes, the BME Group articulates the general principles of action of its administrators, legal representatives, directors and employees through various tools.

A) Criminal compliance and internal control. (103: anti-corruption, 102-16, 102-17, 102-29, 102-30, 205-1, 205-2, 205-3)

With the aim of combating and preventing all types of crimes, and in particular fraud, corruption and bribery, which may eventually materialise in the development of the activities carried out by the Company and strictly comply with applicable legislation in this matter, BME has established a Criminal Risk Prevention Model that is based on general preventive controls, consisting of the rules, bodies and procedures and communication channels and other specific controls such as the Comprehensive Risk Management System and the review carried out by the Regulatory Compliance and Internal Audit Departments.

That model is developed through the principles for the prevention of criminal risks of BME and the companies of its Group, which are the basis of the Criminal Risk Prevention System, described among other documents in the general and the Criminal Risk Prevention Manual, whose updating process has continued during the 2021 financial year for, among other objectives, reviewing its content and improving controls to prevent corruption and other irregular practices. In addition, despite the fact that BME is not subject to an obligation under Law 10/2010 of 28 April on the Prevention of Money Laundering and Financing of Terrorism, the aforementioned Criminal Risk Prevention System establishes specific controls limited to reducing conduct related to money laundering and financing of terrorism within the organisation.

Besides, the BME Group maintained an Internal Whistleblowing Channel in 2021, which was made available to employees on the Human Resources intranet together with its Use Policy, and which establishes the communication procedure and processing of the facts from which indications of breaches of policies or procedures developed by the Group, breaches of the Code of Conduct or other acts that are indications of a possible criminal act can be derived, such as cases of corruption, bribery and swindle.

For its part, the Code of Conduct includes the ethical principles and rules of behaviour that must govern the actions of both its administrators and its legal representatives, directors and employees. It establishes principles and guidelines of conduct to prevent actions related to, among others, crimes of corruption of a public official or bribery and corruption in international commercial transactions, as well as crimes of bribery and influence peddling and against the Public Treasury and Social Security.

It is necessary to point out that the members of the Board of Directors and certain positions of the BME Group companies that are considered supervised entities must complete a declaration of good repute and present the Criminal Record certificate issued by the Ministry of Justice to certify that they do not have a criminal record for the commission of any intentional crime or gross negligence in relation to, among others, the provision of financial services and data services, acts of fraud, embezzlement, bribery or irregular conduct in the management of a company.

Among the monitoring and compliance bodies for this material aspect for BME, we highlight:

- **The Crime Prevention Committee:** a body that reports to the Audit and Risk Committee, which has autonomous powers of initiative and control. This Committee is entrusted with supervising the effectiveness of the internal controls implemented in the BME Group and monitoring the measures adopted in the field of criminal risk prevention. In addition, it must periodically report to the Audit and Risk Committee on the activity carried out and propose to this Committee, if necessary, the precise improvements or updates in the controls and procedures of the Criminal Prevention System.
- **The Audit and Risk Committee.** It is responsible for supervising said System and submitting to the Board of Directors, for its approval, the proposals to modify the Criminal Risk Prevention Manual, as well as informing this body of the actions initiated because of any infraction or non-compliance in criminal matters.
- **The Department of Internal Audit of the Company.** It oversees periodically auditing those processes that may be affected by cases of corruption, bribery and fraud, as well as the risks of fraud that the Board of Directors has identified.

During 2021, no communication was received at BME in the electronic mailbox of the Internal Complaints Channel, and no cases of corruption, bribery and fraud reported or discovered (102-16, 102-17, 205-1, 205-2, 205-3). Likewise, the BME group has not received any significant fine or final sanction in 2021 for non-compliance with the regulations related to economic aspects derived from its operations. (419-1)

B) Transparency and independence in the operation. (102-16, 102-17)

The BME Group is committed to transparency, independence in the operation and the rules of the free market, as well as to fair competition in the markets, and undertakes not to carry out misleading or denigrating advertising of its competition or of third parties.

The Company has an Internal Code of Conduct, the purpose of which is to define the principles and framework of action that must be observed in the field of the securities market by all personnel of BME and of the companies in its Group and the rest of the people who provide their services or maintain a professional relationship with BME and its Group.

Pursuant to the provisions of the Internal Code of Conduct, BME approved a Policy for the treatment and transmission of privileged information, which details the internal control measures and procedures that must be established to safeguard the privileged information of BME and the companies of your group.

In addition to these rules of conduct, BME has a Procedure for reporting deficiencies in the control and management systems, which establishes the channels through which any employee can report any irregularities or deficiencies detected in the systems to the competent internal body. internal control and risk management.

Among the bodies for monitoring and compliance with this material aspect for BME, we highlight that during the 2021 financial year, the Regulatory Compliance Department was responsible for monitoring and reviewing compliance with the Internal Code of Conduct by employees, while the Board of Directors proposal of the Audit and Risk Committee was the body in charge of, where appropriate, imposing sanctions for non-compliance with the Internal Code of Conduct to the members of the Board of Directors and persons with management responsibilities.

During 2021, the BME Group did not identify any irregularity or deficiency in the internal control and risk management systems, and it was not affected by significant legal proceedings for unfair competition practices, monopolistic practices or against free competition. (103: unfair competition, 206-1)

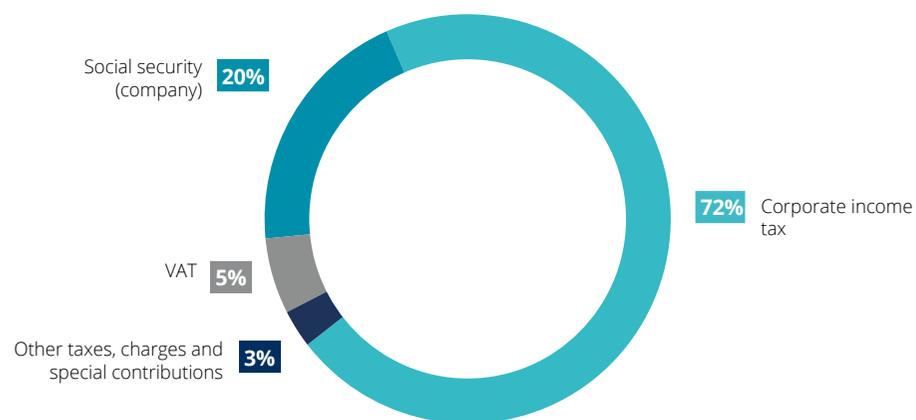
C) Tax transparency. (103: Economic performance, 201-1, 207-1 a 207-4)

The Company, in support of its general business strategy and the achievement of its social interest, complies with current regulations and its tax obligations with transparency, good faith and loyalty, as well as renounces the performance of operations of an artificial nature, without business reason derived from the activity of the Company or in territories considered to be tax havens, except for those aimed at the direct development of the business activity. (207-1, 207-2)

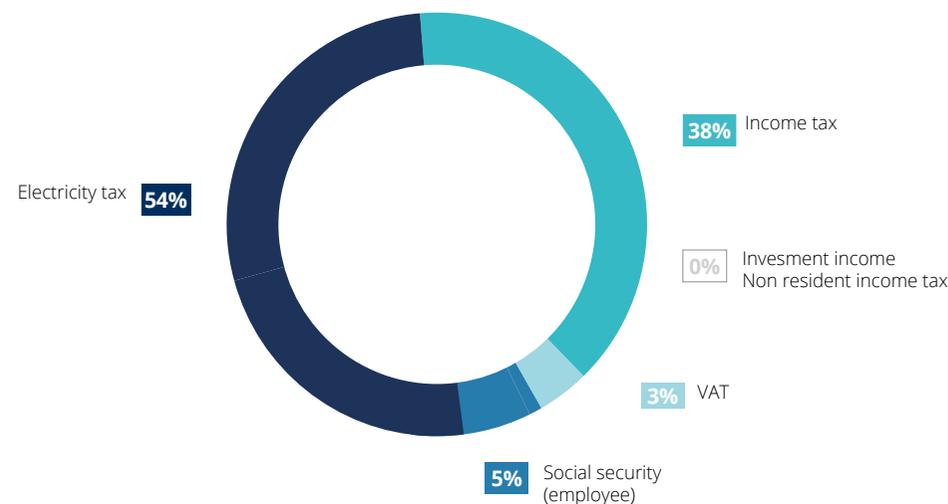
On 30 September 2010, BME adhered to the Code of Good Tax Practices and, following its recommendations, approved tax policy principles in 2011, which were replaced by the tax strategy approved by BME in 2015 and developed by the tax policies applicable to BME and the companies of the BME Group approved in the same financial year 2015. Lastly, employees can also communicate through the Internal Whistleblowing Channel any possible breach by the Company or its employees of the policies or tax procedures developed by the Group.

By virtue of the Company's tax strategy, the Board of Directors, following a favourable report from the Audit and Risk Committee, must approve the corporate operations that, if applicable, could materialise and that are considered relevant by the Company given the special tax treatment they have, as is the case of the creation or acquisition of shares in special purpose entities or domiciled in countries or territories that are considered tax havens, as well as any transaction or operation of a similar nature that could undermine transparency of the group.

TAXES PAID AND OTHER EXPENSES 2021.



TAXES COLLECTED 2021.



LEGEND:

VAT: Value-added Tax. IRPF: Personal Income Tax. IRNR: Non-resident Income Tax. RCM: Investment Income. Social Security (Company) Staff costs related to Social Security.

	2020	2021
Average tax rate of BME Group Corporation Tax ^(*)	24.71%	24.76%
General type of tax lien	25.00%	25.00%

(*) The difference between the average tax rate of the BME Group Corporation Tax applied and the general corporate tax rate during the 2020 and 2021 financial years is due to certain permanent differences that are not tax deductible and consolidation adjustments that are not part of the consolidated tax base.

D) Information security and data protection

The assets of the BME Group, including its operating headquarters, data processing centres and the information associated with the services it provides, as well as the information systems that support it, are for BME strategic resources subject to special protection against to emerging risks, among which cyberattacks or hacktivism stand out.

Likewise, to guarantee and protect the rights of individuals regarding the processing of their personal data, the BME Group companies are responsible for the data of their employees, contacts and customers.

So, BME, within the scope of its Information Security Management System (ISMS), has approved the Logical and Physical Security Policy, which affects the employees and directors of the BME Group companies and any external contractors that may exist, and the different assets – tangible and intangible, movable and immovable – of the Group.

BME's Logical Security Policy, which protects information and computer systems from threats and risks of information leaks, such as cyber-attacks, intrusions, fraud, sabotage and industrial espionage, is developed through the following polities.

Logical security policies	Purpose and development
 <p>Information Security Policy</p>	<ul style="list-style-type: none"> Prevents the abusive use of computer tools, and the consequences that may arise from their use by identifying prohibited behaviours, as well as establishing the control procedures to be adopted by the Company's Management. It is developed through, among others, an access and permission control policy, a password policy, a vulnerability management procedure, an access review procedure and information protection measures, and a standard for contracting services in the cloud. Likewise, BME has an Information Security Procedure for personnel management, defined by the Information Security Department, which is applied to the management of Human Resources in the field of personnel selection and hiring.
 <p>Business Continuity Policy</p>	<ul style="list-style-type: none"> It makes it possible to guarantee BME's operations in the event of serious security incidents. It is developed through the Business Continuity Plan and the Reduced Business Continuity Plan. The companies of the BME Group, Iberclear and BME Clearing have their own Business Continuity Policies.

For its part, the Physical Security Policy includes the security measures implemented by BME to protect the facilities, especially the area in which the data processing centres that house the computer equipment and data processing and storage systems are located. The Security Committee, a body reporting to the CEO's office, is responsible for defining and applying the Security Policy of the BME Group, as well as directing and coordinating the logical and physical security functions in an integrated manner under an Integrated Security Management Model.

Likewise, BME has a Chief Data Officer (CDO) whose functions include digital transformation, data & analytics, support in the implementation of new projects, organisation or coordination of IT with Information Security. It also has a Data Protection Officer who is responsible for compliance with data protection regulations.

Lastly, BME complies with the regulations in force regarding the Protection of Personal Data, has a procedure to exercise the ARCO Rights (Access, Rectification, Cancellation and Opposition) and carries out periodic controls and external audits to guarantee compliance with these obligations.

During the 2021 financial year, there have been no claims in relation to respect for privacy and the loss of personal data of BME Group employees, contacts and clients of BME group companies.

E) Relations with the public administration. (201-4, 415-1)

Given the importance of BME's activities for the proper functioning of the financial markets and, by extension, for the Spanish economy, it is essential that the Company maintain fluid and constant relations with the Public Administrations, relations that are articulated through official channels and are based on strict compliance with applicable regulations, and with the national and international media.

On the other hand, BME does not make any contribution to political parties or political organisations, thus maintaining management independence in its relations with government entities at local, regional and national level.

In addition, BME adheres to the system in which the State Foundation for Training in Employment makes financial aid available to all companies for the training of their employees, which is made effective through the bonus in the payment of Social Security contributions.

In the 2021 financial year, BME has not made any economic contribution to the Government or to public authorities in general. Likewise, the monetary value of the financial aid derived from the State Foundation for Employment Training system during the 2021 financial year was 128 thousand euros.

5.3. RISK MANAGEMENT. [\(102-15, 102-29, 102-30\)](#)

Risk management derived from the various activities carried out by BME, which is based on good corporate governance and a rigorous internal control system as fundamental pillars, is channelled through the specific identification, measurement, evaluation and management systems that each Business Unit and Corporate Area has in relation to the risks it incurs.

A) Description of the Risk Management System.

The Risk Management Policy, which was approved in the 2020 financial year, forms the basis of the Risk Management System and establishes principles and responsibilities with uniform criteria to ensure that the risks that could affect compliance with the strategies and objectives of the BME Group are systematically identified, analysed, evaluated, managed and controlled, making it easier for Senior Management and the governing bodies to make decisions and achieve the objectives of both the BME Group and each of the companies it comprises.

Likewise, BME's Comprehensive Risk Management System (SIGR), prepared based on the COSO II methodology as a reference framework and updated during the 2020 financial year, ensures that it can identify, evaluate and control the relevant risks that could affect the objectives and activities of the Group and allows the integration of the different risk management systems existing in the company, among which are the Criminal Prevention System (SPP) and the Information Security Management System (ISMS).

For its part, for the preparation and maintenance of the Global Risk Map, which was updated during the 2021 financial year, risks are prioritised based on their importance and matrices are drawn up that include the operational processes that manage said risks.

GLOBAL RISK MAP.

Category	Detail of the potential impacts
Business	Risks derived from changes in the business environment, the situation of the competition and the market, changes in the regulatory framework or strategic uncertainty.
Operational	Risks derived from failures in customer service, processes, human resources, physical equipment and computer systems, security and compliance with legal contracts or derived from external factors.
Financial	Risks arising from adverse movements in financial variables, ease of the company to meet its commitments or make its assets liquid, as well as commercial credit risks and risks of a fiscal nature.
Global	Risks that globally affect the BME group related to management and corporate reputation and sustainability, communication and brand advertising strategy, media sponsorships or innovation.

Likewise, within the framework of its risk management system and the aforementioned Criminal Risk Prevention System, BME has identified, evaluated and managed the risks related to, among others, environmental performance (in the event of the possibility of damage to the environment derived from the Company's activity), social (derived, for example, from political or social instability) and labour (derived from adequate processes for measuring and evaluating employee performance), as well as other areas such as the fight against corruption and bribery (due to the possibility of non-compliance with ethical regulations and standards), fraud (due to the risk of committing a criminal act in the work environment) and other irregular practices. None of them form part of the main risks associated with the company's activity. However, the company has established control mechanisms to prevent their materialisation, and none of these risks materialised in 2021.

B) Distribution of responsibilities in terms of risks.

The Continuity and Risk Committee, as a body that reports to the BME Management Committee, performs, among other tasks, the monitoring and analysis of the risks arising from the activities carried out by the Group companies and keeps the Board of Directors informed, through of the Audit and Risk Committee, of the actions undertaken in the preparation and implementation of the risk management and control policy and the implementation and monitoring of the risk assessment model defined and adopted by the Management Committee, as well as in the preparation, application and maintenance of the Business Continuity Policy and the approval and supervision of the application of the Business Continuity Plan.

Lastly, although BME's Comprehensive Risk Management System affects and involves all company personnel, the main participants in the risk management model are, in addition to the Continuity and Risk Committee, the Management Committee and other Committees and departments, the following:

It should be noted that during 2021 no irregularity or deficiency was identified in the internal control and risk management systems. (102-34)

BME'S COMPREHENSIVE RISK MANAGEMENT SYSTEM.

Body at the corporate level	Functions
Board of Directors	<ul style="list-style-type: none"> • Definition of the risk control and management policy, including tax risks, the execution of which is the responsibility of the Management Committee in collaboration with the Continuity and Risk Committee. • Supervision (at least annually) of internal information management and control systems, to ensure that the main risks are properly identified, managed and disclosed.
Audit and Risk Committee	<ul style="list-style-type: none"> • Supervision of the effectiveness of the Company's internal control and risk control systems, including tax risks. • Supervision of the proper functioning of the Company's external and internal audit services, as well as the Group's regulatory compliance function.
Internal Audit Department	<ul style="list-style-type: none"> • Communication to senior management and the Board of Directors (through the Audit and Risk Committee) of the information that allows compliance with the objectives of the organisation, including the analysis and assessment of the effectiveness of risk assessment tasks. • Evaluation and proposals for improving the effectiveness of risk management, control and governance processes through the identification of risks and key controls.

6. Maintenance of a sustainable value chain

- 6.1. Sustainable supply chain management.
- 6.2. Quality and safety of services provided.



BME pursues sustainable management of its value chain, both upstream and downstream. On the one hand, the Company seeks to promote good practices throughout its supply chain, considering sustainability criteria when establishing contractual relationships with its suppliers to encourage respectful action in environmental, social and good governance terms, including respect for Human Rights and as well as the elimination of any type of forced or compulsory labour and child labour.

On the other hand, BME promotes the integration of sustainability not only in the supply chain with its suppliers, but as the entity that manages the Spanish financial markets and systems, BME also assumes its responsibility towards its clients and end users, offering them products and quality services, and an offer of training activities that allow them to act with knowledge and in a responsible manner.

MONITORING INDICATORS FOR A SUSTAINABLE VALUE CHAIN.



91,41% de from locally sourced suppliers



76% of local purchase volume



Approval process for all suppliers that considers ESG criteria



No negative evaluation for non-compliance with regulations and requirements



Quality certificates for the services provided: among others, group entities, by the BME Institute, which has the UNE-EN ISO 9001:2015 certificate from AENOR

6.1. SUSTAINABLE SUPPLY CHAIN MANAGEMENT.

BME suppliers must meet different quality standards depending on the type of products and services they offer, be honest in their business practices and comply with the regulations that regulate their activity, issues that BME requires through specific actions and measures such as the Procedure control of goods and supply of services and selection and evaluation of suppliers described in this chapter.

In addition, BME has an internal Invoice Management procedure that covers the operation of BME's invoice management and authorisation system, from the receipt of the invoice to the corresponding payment and filing.

Supplier Profile. (102-9)

The companies of the BME Group, except for the companies BME Latam SAS and LATAM Exchanges Data Inc, and Openfinance, fundamentally carry out their activity in Spain and rely on suppliers that operate in Spain as the geographical area where the purchase, service and billing (local suppliers) takes place, which means maintaining its commitment to local employment and the supply of local products and services. In this regard, during the 2021 financial year, the companies have registered a total of 1,373 suppliers, of which 91.41% are local suppliers.

SUPPLIERS.

	2020	2021
Local suppliers	1,269	1,255
Non-local suppliers	126	118
Total	1,395	1,373 (*)

(*) 65 of the 1,373 have registered as new providers.

BME's suppliers belong mainly to the technology sector (supply of computer equipment and solutions), support (consulting, auditing, travel agencies) and maintenance (improvement and management of buildings and facilities).

Purchase volume. (204-1)

The total volume of purchases of goods and services in the 2021 financial year fell by 28% compared to the 2020 financial year due to the fact that Openfinance, a company that manages its labour regime independently from the rest of the BME group employees, and the BME Group companies acquired a large number of computer equipment during the 2020 financial year so that 93% of the workforce could carry out their duties in the teleworking modality from March 2020 as a result of the Covid-19 crisis.

INVOICING FOR SERVICES SUPPLIED BY EXTERNAL SUPPLIERS.

	2020	2021
Volume invoiced by suppliers (Thousands of euros)	86,551	62,316
Local suppliers (%)	70.57	76.36
Non-local suppliers (%)	29.43	23.64

Average payment period to suppliers.

As in previous years, BME has settled all supplier invoice payments within the maximum legal period established. During the 2021 financial year, BME's average payment period was 48 days. In compliance with current regulations regarding the fight against delinquency in commercial operations and in matters of corporate governance, said information can be found on the Company's corporate website (www.bolsasymercados.es).

AVERAGE PAYMENT PERIOD TO SUPPLIERS, IN DAYS.

	2020	2021
BME	65	48
Other Companies belonging to the Group	36	40

[Integration of sustainability in relationships with suppliers.](#) (102-10, 308-1, 308-2, 407-1, 412, 414-1, 414-2)

The “Order Authorisation System” (SI3), is the system that supports each of the phases of the product and service supply process (initiation, approval, budget control and order payment management) and, among others, issues and allows (in execution of the Procedure) for the control of goods and the supply of services and the selection and evaluation of suppliers:

- (i) Identify and minimise the risks of the supply chain thanks to the supplier’s commitment to regulatory compliance (economic, environmental and social-labour).
- (ii) Strengthen the organisation’s cost management; and
- (iii) Knowing the origin and geographical location of the product components, which in the case of local suppliers, allows reducing the CO2 footprint of the product in question.

Additionally, the BME Group has a series of mechanisms in its supply process for goods and services that help the Company to continue developing the sustainable and responsible management of its supply chain:



Given the lack of risk in terms of human rights, BME has not carried out any significant investment agreement in which clauses related to human rights have been included (412-1, 412-3)

6.2. QUALITY AND SAFETY OF SERVICES PROVIDED.

(416-1, 416-2, 418-1)

BME remains firmly committed to the quality and security of the services provided to users who, as detailed in Chapter 3 of this report, are mainly entities supervised by the CNMV. Likewise, BME directly provides its services to private investors in the areas of information, consultancy, IT, contingency and business continuity and training.

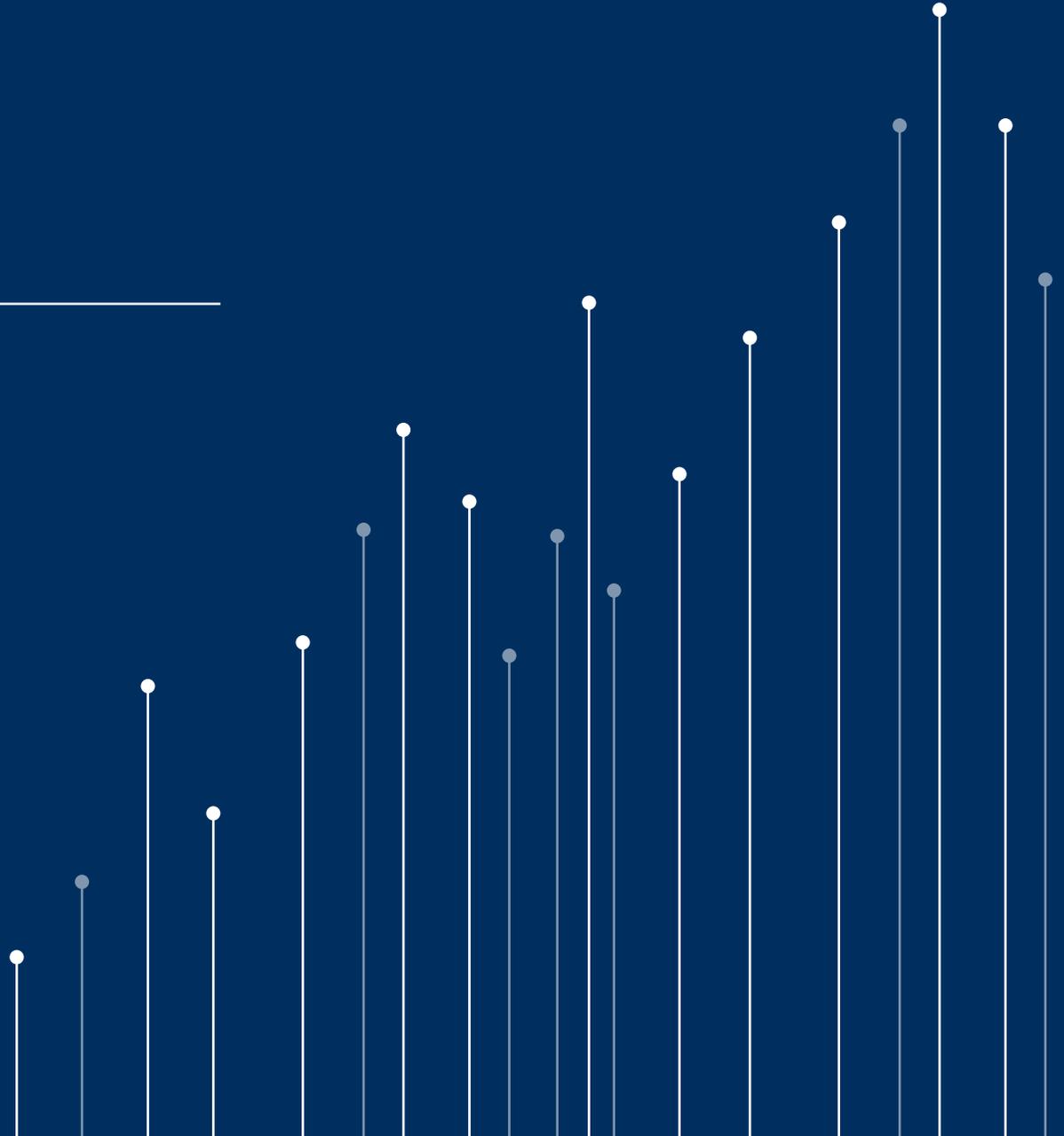
In terms of quality, BME Inntech has the UNE-EN ISO 9001:2015 certificates from AENOR, which guarantees the quality of contingency services, business continuity, physical and virtual hosting of client equipment, as well as its management applications and data; technical management and maintenance of computer platforms specialised in the financial sector; provision of financial messaging exchange services for banks and companies; consulting and training on international financial markets, and UNE-ISO/IEC 20000-1:2011, which endorses the Information Technology Services Management System that supports the provision of services to clients: Contingency and Business Continuity, Physical and virtual hosting of client equipment, as well as their management applications and data. Technical management and maintenance of computer platforms specialised in regulatory compliance of the financial sector. Financial messaging exchange for banks and companies.

Likewise, Instituto BME has the UNE-EN ISO 9001:2015 certificate from AENOR, which endorses the quality of the design services and provision of training in financial market operations that this company provides.

The services provided by the Investor Protector that the Governing Companies of the Madrid, Barcelona, Bilbao and Valencia Stock Exchanges created and maintain as a figure in charge of assisting and protecting private investors, despite the fact that they are not their direct customers. This body deals with queries and claims from users, tries to prevent the presentation of complaints and disputes about operations carried out on the Stock Exchange and promotes the creation of conditions that allow the clarification of the facts and doubts raised by investors and the intermediation between the parties. During the 2021 financial year, the four Stock Exchanges have appointed Ms Gloria Martinez-Picazo.

During the 2021 financial year, BME has continued to develop services and products that respond to the needs of customers and users of the markets and to meet the demands of companies and participants in the financial markets. The new services and products are described in the 2021 annual market report and in the press releases that are available to users and investors on BME's corporate website www.bolsasymercados.es.

7. Commitment to people



BME promotes the professional and personal development of its employees through the constant improvement of its training programs and professional promotion, as well as the technological tools available to streamline any procedure, query or request made by BME Group employees.

COMMITMENT TO THE DIVERSITY, HEALTH AND DEVELOPMENT OF OUR EMPLOYEES.

 **38% of women in the workforce**

 **0 occupational accidents in 2021**

 **93% of employees able to telework**

 **30,970 hours of training given (including language training and personalised training) in 2021 (66.7 hours/employee on average)**

 **100% of employees under collective agreements**

The Human Resources Director of the BME Group, in coordination with the Human Resources Director of SIX, has supervised during the 2021 financial year, among other issues, compliance with the regulations related to labour, occupational health and safety aspects of the employees of the Group, as well as training plans, prepared by the Training Manager. In the same way, the General Director of Openfinance during the 2021 financial year has managed, directly and independently of the BME Group staff, compliance with the regulations related to labour, occupational health and safety aspects of the employees of this Company. (103: Employment)

In line with this commitment by BME, no significant fine or firm sanction was received for non-compliance with regulations related to social aspects. (103: Socioeconomic Compliance, 419-1)

7.1. MAIN FIGURES OF BME'S STAFF. (102-8, 405-1).

CURRENT EMPLOYEE PROFILE.

Women	Men
I represent 38.07% of the workforce	I represent 62.93% of the workforce
I represent 32.53% of hires in 2021	I represent 67.47% of hires in 2021
I have an indefinite contract (100%)	I have an indefinite contract (100%)
I am between 30 and 50 years old (58,44% of women)	I am between 30 and 50 years old (56,69% of men)
I have received 62.41 hours of training on average in 2021	I have received 69.86 hours of training on average in 2021
I work in Spain (99.35% of women)	I work in Spain (99.20% of men)

The employee data set out in this report refers on aggregate to BME Group employees and Open Finance, S.L.U. employees, which manages its workforce separately from the rest of BME Group employees.



BME is committed to **diversity** among its employees and gives special relevance to **SDG #5**, which promotes gender equality

WORKFORCE BY GENDER AS AT 31 DECEMBER OF EACH YEAR.

	2020	2021
Women	300	308
Men	498	501
Total	798	809

EMPLOYEES BY GENDER, AGE AND PROFESSIONAL CLASSIFICATION AS AT 31 DECEMBER OF EACH YEAR.

	2020			2021		
	Men	Women	Total	Men	Women	Total
Senior management	7	2	9	7	2	9
Middle management	35	20	55	30	18	48
Specialist technicians	302	193	495	286	186	472
Administrative/ Auxiliary/Support Staff	154	85	239	178	102	280
<30	56	37	93	64	38	102
30-50	288	177	465	284	180	464
>50	154	86	240	153	90	243

EMPLOYEES BY GEOGRAPHICAL AREA AND GENDER AS AT 31 DECEMBER OF EACH YEAR.

	2020	2021
Madrid (Spain)	613	645
Women	238	250
Men	375	395
Barcelona (Spain)	78	73
Women	25	24
Men	53	49
Bilbao (Spain)	27	25
Women	10	10
Men	17	15
Valencia (Spain)	75	60
Women	25	22
Men	50	38
Miami (United States)	1	1
Women	0	0
Men	1	1
Bogotá (Colombia)	4	5
Women	2	2
Men	2	3

NUMBER OF EMPLOYEES BY CONTRACT TYPE AS AT 31 DECEMBER OF EACH YEAR. ^{(1) (2)}

	2020			2021		
	Men	Women	Total	Men	Women	Total
Annual average of permanent contracts by gender, age and professional category						
Senior management	7.00	2.00	9.00	6.83	2.00	8.83
Middle management	33.42	18.50	51.92	31.25	18.58	49.83
Specialist technicians	292.50	188.92	481.42	287.08	187.75	474.83
Administrative / Auxiliary / Support Staff	150.83	80.83	231.67	155.75	88.92	244.67
<30	45.42	32.33	77.75	49.75	33.42	83.17
30-50	287.25	175.50	462.75	282.50	176.83	459.33
>50	151.08	82.42	233.50	148.67	87.00	235.67
Annual average of temporary contracts by gender, age and professional category						
Senior management	0	0	0.00	0	0	0
Middle management	0	0	0.00	0	0	0
Specialist technicians	0.08	0	0.08	0	0	0
Administrative / Auxiliary / Support Staff	4.75	4.75	9.50	10.58	4.67	15.25
<30	4.75	3.92	8.67	10.58	4.50	15.08
30-50	0	0.83	0.83	0	0.17	0.17
>50	0.08	0	0.08	0	0	0

PERMANENT EMPLOYEES BY CONTRACT TYPE.

	2020	2021
Full-time contract	798	809
Part-time contract	0	0
Total	798	809

CONTRACTED AND SUBCONTRACTED WORKFORCE.

	2020	2021
Contracted employees	798	809
Subcontracted employees	113	130
Employees and management hired locally	100%	100%

EMPLOYEES WITH DISABILITIES. (*)

AVERAGE NUMBER OF EMPLOYEES WITH A DISABILITY OF 33% OR MORE

	2020	2021
Senior management	0	0
Middle management	0	0
Specialist technicians	5.08	6.58
Administrative / Auxiliary / Support Staff	1	1.83
Total	6.08	8.42
Employees with disabilities with permanent contracts	100%	100%

(*) All BME Group companies and Open Finance, S.L.U., which employs more than 50 people, have certificates of exception, or comply with the contents of Royal Legislative Decree 1/2013, of 29 November, approving the Consolidated Text of the General Law on the rights of people with disabilities and their social inclusion.

7.2. COMMITMENT TO DIVERSITY AND EQUAL OPPORTUNITIES. (406-1)

In 2019, the BME Group set up the Equality Plan Negotiating Committee for the purpose of initiating the negotiation of Equality Plans in BME Group companies with more than 50 workers. Although to date the equality plans have not yet been approved, the BME Group companies promote and guarantee a work environment free of discrimination, with respect and equal opportunities for their employees in their personal and professional lives, regardless of gender, race, religion, age, sexual orientation, national origin or disability.

In this way, the company's practices for the management of human resources in general and the selection, remuneration, promotion and training follow the merit and capacity criteria of each position and are governed by BME's commitment to equality between men and women. Along these lines, BME has a Joint Equality Committee for the purpose of analysing and, where appropriate, implementing the possible resulting measures in terms of Equality in BME Group companies.

Likewise, the selection of personnel is carried out, in accordance with the procedure approved on 28 January 2019, in guarantee of confidentiality, independence and equal opportunities, first through internal processes and later by resorting to external hiring. During the 2021 financial year at BME, there have been no new incidents related to discrimination or complaints of cases of human rights violations. (406-1)

Additionally, as in previous years, BME has promoted International Women's Day with a Bell Ringing for Gender Equality within the scope of the program of events and activities to celebrate Diversity Week, which took place from 3 to 10 March 2022, among which the discussion table "The differentiating role of women in financial markets" stands out after the Ring of the Bell for Gender Equality.

BME has an "Internal Action Protocol in cases of alleged workplace and sexual harassment", which was permanently made available to employees on the BME intranet to guarantee the

protection of the fundamental rights of all employees of the BME Group, aimed at ensuring zero tolerance and the prohibition of behaviour that could constitute such harassment phenomena. The Protocol also includes a procedure for action against indications of workplace or sexual harassment that specifies the existing notification channels for their correct notification and management. During the 2021 financial year, no notification related to indications of workplace or sexual harassment was received.

Finally, BME fully embraces the United Nations Universal Declaration of Human Rights and its protocols in its work practices, and in this regard, since 2011 it has adhered to the United Nations Global Compact. Given the inexistence of human rights risk, BME has not carried out any significant investment agreement in which human rights clauses have been included (103: [Human rights assessment, 412-3](#)).

Gender pay gap.

The correct application of the measures contained in the remuneration policy for employees of the BME Group has made it possible to reduce the salary gap in 2021 compared to 2020 in all professional categories of "Middle Management" and "Administrative/Auxiliary/Support".

GENDER PAY GAP. (*)

(405-2)

	2020	2021
Senior management	1.02	1.05
Middle management	1.14	1.04
Specialist technicians	1.04	1.06
Administrative / Auxiliary / Support Staff	1.06	1.01

AVERAGE REMUNERATION. (*)

(THOUSANDS OF EUROS)

	2020	2021
Breakdown by gender		
Men	70.08	69.50
Women	62.23	63.23
Breakdown by age range		
<30	33.49	34.20
30-50	57.90	60.35
>50	98.03	93.85
Breakdown by category		
Senior management	473.53	412.75
Middle management	178.10	177.39
Specialist technicians	60.83	64.10
Administrative / Auxiliary / Support Staff	39.32	41.78

(*) To calculate average remuneration, the actual remuneration received by the worker from BME (fixed remuneration, actual variable remuneration received, corresponding to the previous year, and remuneration in kind) and the number of days that he/she worked for the company during the year have been used. The number of employees considered reflects the total at the end of the year.

7.3. WELFARE AND OCCUPATIONAL HEALTH. (403-1, 403-2,

403-3, 403-6, 403-7, 403-8)

Although BME does not have a health and safety management system that is aligned with the international certification standard, it has established the safety, prevention and health measures contemplated in the Law on Prevention of Occupational Risks in all its work centres. Likewise, it carries out risk assessments, both of its facilities and of its employees' jobs, on an annual basis, drawing up, with the collaboration of the employees through their legal representatives and the internal bodies in this matter, a roadmap based on the risks and needs detected, which includes preventive measures to reduce said risks (training, information, personal protective equipment and regular checks).

Along these lines, BME has the following committees that control and advise on health and safety programs in the workplace, which represent 100% of the workforce, and are made up of both managers and employees: Safety and Health Committee Health, Evacuation Team, Emergency Team and First Aid Team. In particular, the Health and Safety Committee has a mailbox associated with the prevention, health and hygiene delegates of the BME group as a mechanism through which complaints and/or suggestions regarding aspects related to health, comfort and ergonomics can be forwarded.

In addition, the Company makes available to all employees, through Human Resources On-Line, the details of the components of the Intervention, Evacuation and First Aid teams, as well as the Health and Safety Manual in Offices and the recommendations in terms of prevention of occupational risks when the provision is made in telecommuting mode.

Employee health. (403-9, 403-10)

Notwithstanding the fact that the professions of BME employees, except for maintenance personnel, do not have a high incidence or risk of illness, BME provides its employees with a healthy work environment and seeks the well-being of employees in the work environment. With this objective, it has a Physiotherapy Service and a First Aid Kit in the work centres, equipped with modern instruments for immediate care in cases of cardiac arrest (Semi-Automatic External Defibrillators) and a Nursing Service, physically located in Las Rozas, which is complemented by a telephone service that will allow queries to be made via video call in all work centres.

In addition, BME provides all its employees with an annual medical examination and has taken out healthcare insurance for all its employees and members of their family unit, which covers medical, surgical and hospital care in the event of illness or injury in accordance with the agreed coverage and in relation to the insured risks, as well as organising flu vaccination campaigns on an annual basis.

FREQUENCY RATE. SEVERITY INDEX. OCCUPATIONAL DISEASE RATE, DAYS LOST AND ABSENTEEISM. ⁽¹⁾

2020									
Breakdown by region						Breakdown by gender			
	Madrid	Barcelona	Bilbao	Valencia	Total	Men	Women	Total	
Injury rate (Frequency rate) ⁽²⁾	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Severity index	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Occupational disease rate	0.98	0.00	0.00	0.00	0.76	0.00	2.03	0.76	
Lost workday rate ⁽³⁾	3.75	0.00	0.00	0.00	2.90	0.00	7.69	2.90	
Absenteeism	No. hours	15,718	2,573	2,650	402	21,343	14,387	6,956	21,343
	Rate	1.55%	2.03%	5.85%	0.33%	1.63%	1.76%	1.41%	1.63%
2021									
Breakdown by region						Breakdown by gender			
	Madrid	Barcelona	Bilbao	Valencia	Total	Men	Women	Total	
Injury rate (Frequency rate) ⁽⁴⁾	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Severity index	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Occupational disease rate	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Lost workday rate ⁽⁵⁾	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Absenteeism	No. hours	21,193	2,795	3,400	1,284	28,672	17,983	10,688	28,672
	Rate	2.03	2.32	8.09	1.12	2.17	2.20	2.12	2.17

(1) The calculation of these rates considers all employees who, over the course of the year, have worked for BME Group and Open Finance, S.L.U. (data of employees of BME Latam SAS and LATAM Exchanges Data Inc. are not included as they are regulated by different legislation and are not material).

Furthermore, the definitions considered in the calculation of the health and safety indices are established in accordance with GRI Standards:

- Accident: Fatal and non-fatal accidents in the workplace.
- Occupational disease: Disease deriving from an employment-related situation or activity.
- Workdays lost: Sick leave of an employee due to an accident or occupational disease.

- Absenteeism (hours): Number of hours employee absent from work due to a disability of any type, not only due to an accident in the workplace or occupational disease.

Furthermore, the formulas used for the calculation of the health and safety indices are as follows:

- Index of accident with injury (Frequency rate): $\text{No. accidents} \times 10^6 / \text{No. total work hours scheduled}$.
- Severity index: $\text{Days lost} \times 10^3 / \text{No. Total work hours scheduled}$.
- Occupational disease rate: $\text{No. Occupational diseases} \times 10^6 / \text{No. total work hours scheduled}$.

- Workdays lost rate: $\text{Workdays lost} \times 10^5 / \text{No. total work hours scheduled}$.

- Absenteeism rate: $\text{No. absenteeism hours} \times 10^2 / \text{No. total work hours scheduled}$.

(2) During 2020 fiscal year, there were no accidents with injury.

(3) During 2020 fiscal year, no accidents occurred at BME Group that resulted in the loss of working days.

(4) During 2021 fiscal year, there were no accidents with injury.

(5) During 2021 fiscal year, no accidents have occurred at BME Group that resulted in the loss of working days.

Health and safety training. (403-5)

The company provides the proper training of employees in health and safety. Thus, all newly recruited employees take an online training course on standards and actions in the area of occupational risk prevention. Likewise, BME has a Health Surveillance program, in which, among other issues, information and training is provided through the “Choose Health Channel” of the mobile application for BME Conecta employees.

The First-Aid Kit Service, with the collaboration of the Human Resources and Corporate Communication areas, informs about existing blood donation campaigns and continues to publish informative Health Bulletins, as well as giving practical theoretical workshops on safety and health.

Situation and protocol against COVID-19.

The development of the health crisis derived from Covid-19 during the 2021 financial year has again required an extra effort from the entire organisation during this second financial year since the appearance of the virus to maintain business continuity and adapt the development of work to the evolution of the pandemic situation.

During the 2020 financial year, the Crisis Committee and the Continuity and Risk Committee, responsible for detailed monitoring of the situation, implemented all the measures established in the “Continuity Plan”, adapting them to the specific needs of Covid-19 and creating a single reference framework for crisis management through the following protocols, which have been constantly reviewed and developed during the 2021 financial year to continue advancing in the process of returning to normality with all the necessary security measures given the current situation.

COVID-19 CRISIS MANAGEMENT PROTOCOLS.

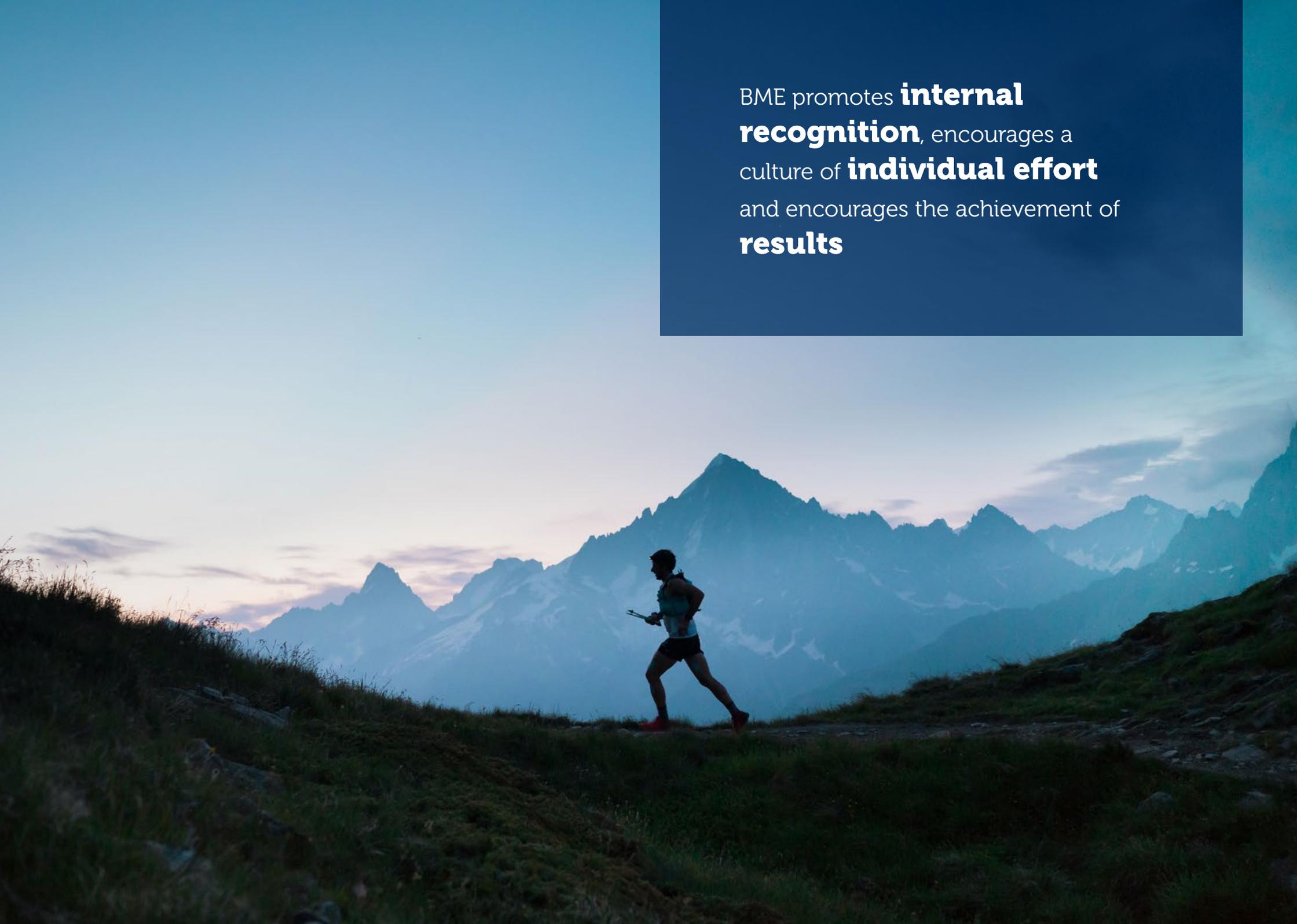
Protocols and de-escalation plan for employees	The de-escalation plan establishes the different phases for the return to normality and their corresponding occupancy limitations and main associated restrictions, as well as defining the safety and hygiene protocols that must be followed in the day-to-day management of the crisis, as well as before entering the workplace and at the workplace.	Before access Market Stall	<ul style="list-style-type: none"> • Self-monitoring protocol • Building access protocol • Exit protocol • Assignment and management of toilets
		In the post of work	<ul style="list-style-type: none"> • Assignment and management of rest areas • Canteen Management • Safety measures in the workplace
Action protocol against a positive	Identifies the different possible cases in a positive or suspicious case among workers and establishes a pattern of action for each of them.		
Temporary access request protocol	Defines the process for requesting, reviewing and approving all physical access to the Group's facilities.		
Protocol for holding events	List of additional measures and procedures to consider when managing the holding of events during the management of the Covid19 situation.		

DE-ESCALATION PLAN.

First phase	Second phase	Third phase	Last phase
Only functions and critical departments.	May include staff from non-critical departments.	Incorporation of the rest of staff except risk groups.	Once the Covid-19 crisis is over and security is restored.
<ul style="list-style-type: none"> • Incorporation of a maximum of 15% of each UN/AC. • At least 50% of each operational function in permanent teleworking. (Minimum one person). • The use of shared facilities by third parties is allowed. 	<ul style="list-style-type: none"> • Incorporation of a total maximum of between 35% and 40% of each UN/AC. • At least 50% of each operational role in permanent teleworking* (minimum one person). • Review the suitability of the security measures implemented. • Customer access to the facilities is allowed. 	<ul style="list-style-type: none"> • Maintenance of 20% of permanent teleworking. • Elimination/reduction of certain measures (capacity in bathrooms and common areas and social distancing). • Review the suitability of the security measures implemented. 	<ul style="list-style-type: none"> • Elimination of certain security measures. • Incorporate risk personnel. • Assess the use of PPE by risk personnel. • Access would be allowed by all staff. • Maintain a higher percentage of teleworking than before the pandemic.

During the 2021 financial year, BME has kept updated the measures, good practices and requirements that must be observed during the provision of remote services while the current exceptional and extraordinary situation resulting from the pandemic continues and until the Company deems it appropriate to return to the work method for the purpose of teleworking being carried out in the most satisfactory way possible.

BME promotes **internal recognition**, encourages a culture of **individual effort** and encourages the achievement of **results**



7.4. TALENT ATTRACTION AND RETENTION.

BME promotes the development of BME Group employees through internal recognition and talent attraction, rewarding the achievement of results and observing the culture of individual effort in an environment of consistent compensation. (401-1, 404-1, 404-2)

A) Career development and remuneration policy. (102-36)

i) Career advancement.

BME Group employees can promote themselves professionally and access a higher level within each professional group by achieving objectives based on three criteria: annual evaluation of the employee, training and seniority at the level.

ii) Remuneration policy for employees and executives. (103: Diversity and equal opportunities, 102-36)

The remuneration policy for BME Group employees corresponds to the objective of providing the Group with adequate procedures that allow the dynamics of the market in remuneration matters to be aligned with the strategic objectives of the business.

The main elements of the Remuneration Policy for BME Group employees, the concepts of which are established in the applicable Collective Agreement, ensure equal remuneration for posts with equal characteristics, namely:

- a) The fixed remuneration which comprises a base salary established in the applicable Collective Agreement and a personal complement which remunerates, without any form of discrimination, the professional track record, the responsibility inherent in the post and the level of professionalism exercised and determined by the content of the post

held. The remuneration regime of the base salary included in the Collective Agreement of application guarantees the absence of remuneration differences for this item between men and women.

- b) The annual variable remuneration that a group of identified professionals may receive, according to the professional level and post held and dependant on the individual and area targets achieved, the aim of which, in the medium term, is to attract, retain and obtain the commitment of mainly the directors and prominent persons of the Group, ensuring the establishment of a stable bond and with a view to remaining with the company for a long period of time.
- c) Social benefits. The employees subject to the collective agreements of BME, Barcelona Stock Exchange and Bilbao Stock Exchange also have a series of social benefits through which it is aimed to obtain a balance between personal and work life, mainly through financial support (aid for physically and mentally disabled children and attention to diversity, grants for the employees' children, nursery vouchers, assistance for employees' studies and their children's, baby bonus, wedding bonus, interest-free salary advances, personal loans and benefits for disabled employees).

B) Employee training and talent development. (404-1, 404-2)

BME states its commitment to the training of its employees in article 26, section b) of the statutory Collective Bargaining Agreement, in whose application “it will promote plans to promote the training and professional improvement of its workers, guaranteeing the possibility of training to all the employees”.

The Human Resources area promotes the professional and personal development of employees through general training programs and specific training programs directly related to the business objectives that, during the 2021 financial year, have been developed online. In order to identify training needs and improve their quality, a Training Committee was created, of which the workers’ trade union representation forms a part, and a Training and Development team at BME.

The BME@Learning Platform, which was in operation during the 2021 financial year until 1 January 2022, is an online training space that includes courses on various topics, such as skills, well-being, management and leadership. This platform has also served to reach all employees when launching mandatory corporate training.

During the 2021 financial year, the BME training actions that were published on the BME intranet have been managed as of August 2021 through the SIX Human Resources portal, within the scope of the “SIX Academy” initiative, where BME employees can access both the courses from the BME catalogue and those from the SIX global catalog.

Likewise, in financial year 2021, the Company’s Training and Development team has made the “Openwebinars” tool available to BME employees, an IT training platform with more than 300 courses and workshops related to new technologies and, in collaboration with Instituto BME, it has created a new space for free and exclusive training for BME employees called BOGE (“BME On Going Education”). On the other hand, the Company has made available to employees during 2021 an eLibrary called “Bookboon”, which offers all kinds of content, audio and digital books on various topics to help you in your personal development, and a learning platform called “Udemy for Business” to continuously improve technical skills or competencies in areas such as software development and programming, marketing and sales, soft skills, etc.

Finally, the Company has a Language Training Program that was made available to employees during the 2021 financial year, of which the possibility of receiving training in English, German or French and the implementation of the tool “Speexx Essentials”, a learning space, available through BME@Learning, which allows you to improve your skills in the three languages.

EMPLOYEE TRAINING BME GROUP. ^{(1) (2)}

	2020			2021		
	Men	Women	Total	Men	Women	Total
Number of employee training hours (by professional category)						
Senior management	0	0	0	1,234	67	190
Middle management	53	183	235	550	426	976
Specialist technicians	3,197	1,026	4,223	12,025	7,726	19,752
Administrative / Auxiliary / Support	2,364	845	3,209	6,163	3,889	10,052
Average employee training hours (by professional category)						
hrs/employee-senior management	0	0	0	18	33	21
hrs/employee-middle management	7	15	12	39	43	41
hrs/employee-specialised technician	14	11	13	77	64	71
hrs/employee- administrative/auxiliary staff	0	0	0	70	64	66

(1) These figures include the training derived from training actions of general application to BME Group employees (that is, excluding Open Finance, S.L.U.), including language training and personalised or specific training. Likewise, these figures do not include briefings of a regulatory/mandatory nature, among which are the Criminal Risk Prevention courses that began in 2020 and ended in 2021, and information security and data protection.

(2) The calculation of the average training hours is based on the number of hours of training given to each trained employee, by professional category.

C) Social benefits and benefits for employees. (401-2, 404-2)

In the companies of the BME Group, the daily working day, carried out from Monday to Friday, is 7 hours 30 minutes of effective work, allowing a flexible start time, between 8:30 and 9:30 a.m., and departure not before 5:00 p.m.

BME promotes work flexibility and the reconciliation of work with personal and family life among its permanent and temporary employees with various initiatives: unpaid and paid leave, reduction of working hours for legal guardianship and breastfeeding, flexibility in entry and exit times, working days of five and a half hours on Fridays and the eve of public holidays, limitation on the number of overtime hours per employee and the possibility of requesting vacations at any time, which can be divided into several periods.

SOCIAL BENEFITS.



Family conciliation. Among other measures, unpaid and paid permits, reduction of working hours for legal guardianship and breastfeeding, five and a half hour shifts on Fridays and the eve of holidays and limitation on the number of overtime hours per employee.



Digital disconnect. BME has had a job disconnection policy since 2020.



Telecommuting and payment remote connection. BME makes available to employees the possibility of working totally or partially remotely and has paid employees financial aid during the 2021 financial year to facilitate remote connection.



Special conditions in services provided by third parties. It provides services and offers for employees such as Benefits Club.

Finally, since 2018, the Company has had the BME Conecta mobile application for employees, from which employees can access various online human resources functionalities and other

services and offers for Club de Benefits employees. Likewise, during the 2021 financial year, employees have been able to benefit from the travel office for the organisation of trips and private vacations, as well as special conditions for different services provided by third parties.

D) Employee hires and departures.

EMPLOYEE HIRES AND DEPARTURES BY GENDER. (*)

(401-1)

	New hires		Employee departures	
	2020	2021	2020	2021
Total	57	83	59	71
Breakdown by gender				
Men	41	56	42	53
Women	16	27	17	18
Breakdown by age range				
<30	3	10	8	15
30-50	54	73	11	33
>50	0	0	40	23
Breakdown by geographic area				
Madrid (Spain)	32	76	38	44
Barcelona (Spain)	6	5	11	10
Bilbao (Spain)	0	0	2	2
Valencia (Spain)	18	1	8	15
Miami (USA)	0	0	0	0
Bogotá (Colombia)	1	1	0	0

(*) For the preparation of this table, the date of effect of the hiring and leaving of employees in the companies of the corporate group was taken into consideration. Movements between these companies do not consider registrations or cancellations.

EMPLOYEE HIRE RATE (%). (*)

	2020	2021
Total Workforce	7.14%	10.26%
Breakdown by gender		
Men	8.23%	11.18%
Women	5.33%	8.77%
Breakdown by age range		
<30	3.23%	9.80%
30-50	11.61%	15.73%
>50	0.00%	0.00%
Breakdown by geographic area		
Madrid (Spain)	5.22%	11.78%
Barcelona (Spain)	7.69%	6.85%
Bilbao (Spain)	0.00%	0.00%
Valencia (Spain)	24.00%	1.67%
Miami (USA)	0.00%	0.00%
Bogotá (Colombia)	25.00%	20.00%

(*) Employee hire rate was calculated using GRI Standard criteria: number of hires among total workforce at year-end.

EMPLOYEE TURNOVER RATE (%). (*)

	2020	2021
Total Workforce	7.39%	8.78%
Breakdown by gender		
Men	8.43%	10.58%
Women	5.67%	5.84%
Breakdown by age range		
<30	8.60%	14.71%
30-50	2.37%	7.11%
>50	16.67%	9.47%
Breakdown by geographic area		
Madrid (Spain)	6.20%	6.82%
Barcelona (Spain)	14.10%	13.70%
Bilbao (Spain)	7.41%	8.00%
Valencia (Spain)	10.67%	25.00%
Miami (USA)	0.00%	0.00%
Bogotá (Colombia)	0.00%	0.00%

(*) The turnover rate was calculated according to the criteria of the GRI Standards; number of dismissals among the total workforce at the end of the year. The percentage of the turnover rate is reported, without detailing the total number of employees, as this data is more descriptive.

NUMBER OF DISMISSALS.

	2020	2021
By gender		
Women	0	4
Men	1	8
By age		
<30	0	4
30-50	0	3
>50	1	5
By professional classification		
Senior management	0	0
Middle management	0	3
Specialist technicians	0	6
Administrative / Auxiliary / Support	1	3

7.5. LABOUR RELATIONS. (102-41).

BME guarantees all its workers the right to freely organise for the promotion and defence of their economic and social interests. The union representation bodies of the workers and the technical committees derived from the Collective Agreement in which the employees participate constitute a channel of constant dialogue between the Company and the employees aimed not only at collective bargaining but also at the resolution of possible conflicts that may arise.

All employees of the BME Group who provide their services in Spain are subject to the statutory Collective Agreement for Plurality of Companies Linked for Organisational and Productive Reasons at state level corresponding to the 2018-2020 financial years, which during the 2021 financial year was extended due to the new collective agreement that was negotiated during 2021; it was not signed as of 31 December 2021.

The aforementioned statutory Collective Agreement covers labour relations between the different companies of the BME Group and their workers, with the exception of the employees of the Barcelona Stock Exchange and the Bilbao Stock Exchange, which are regulated by their own Collective Agreements, the validity of which is also extended by the same reason as the aforementioned statutory Collective Agreement and whose clauses are equivalent in all its aspects (social benefits, rights and obligations of employees and any other concepts).

On the other hand, the staff of Openfinance employees is subject to the Collective Agreement of Offices and Dispatches of the Province of Valencia of 30 November 2015, which is tacitly extended.

EMPLOYEES COVERED BY COLLECTIVE AGREEMENTS (%).⁽¹⁾

	2020	2021
Percentage of BME Group employees covered by Collective Agreements		
Statutory Collective Agreement for Companies Sharing Organisational and Productive Factors	92.00%	93.60%
Collective Agreement of Sociedad Rectora de la Bolsa de Valores de Barcelona	3.72%	3.33%
Collective Agreement of Sociedad Rectora de la Bolsa de Valores de Bilbao	4.28%	3.07%
Percentage of Open Finance SLU employees covered by Collective Agreements		
	100%	100%

(1) All the employees of the BME and Openfinance group companies that are within the scope of this Non-Financial Information Statement are in Spain, except for BME Latam SAS and LATAM Exchanges Data Inc, whose employees are not subject to collective agreements in accordance with to Spanish regulations.

During the 2021 financial year, no controversy has arisen with the representation of the workers. Likewise, during the year the workforce has not suffered a significant change in total volume, beyond the casualties derived from forced retirement after the modification of the collective agreement, carried out in October 2019, due to reaching the legally established age of in accordance with the provisions of Royal Decree-Law 28/2018 of 28 December.

8. Generation of a positive impact on society

(413-1, 413-2)

- 8.1. Generation of a positive socioeconomic impact through the activity.
- 8.2. Disclosure of financial knowledge.
- 8.3. Promotion of local development.
- 8.4. Support and affiliation to associations.

The BME Group, through its own activity, generates a positive socioeconomic impact on society, participating in national economic growth, job creation, but also in the development of small and medium-sized Spanish companies in search of financing. In addition, to maximise its positive impact, Grupo BME is committed to disseminating financial knowledge at all levels and to supporting the local community, through the organisation of cultural activities and social initiatives to help the most underprivileged.

On the other hand, the BME Group implements as many actions as it deems necessary to ensure legal compliance and assess and mitigate the negative impacts that its activity could cause in local communities, as was made clear in chapter 6 of this report in relation to its new suppliers from whom it has requested during the 2021 financial year the signing of a declaration of compliance with economic and technical requirements, as well as environmental, social, occupational health and safety and human rights regulations. [\(103: Indirect economic impact\)](#)

BME'S POSITIVE CONTRIBUTION TO SOCIETY IN FIGURES.



Total tax contribution: 100.396 thousand euros.



Brainindex and other financial / stock market training initiatives organised by BME.



1,428 thousand euros of economic investment in training and financial culture.



150 thousand euros of investment allocated to actions to support the community.

8.1. GENERATION OF A POSITIVE SOCIOECONOMIC IMPACT THROUGH THE ACTIVITY.

By disseminating and providing value-added services to listed companies, intermediaries and other investment services companies, BME strengthens market transparency, investor protection and security, non-discriminatory participation in the markets, channelling from savings to productive investment, and adds value to the national economy in terms of economic growth and job creation.

Likewise, the tax strategy and policy applied by BME and the BME Group companies, in line with best tax practices, contributes to maintaining and strengthening the public sector and socioeconomic equality.

On the other hand, BME contributes to generate a positive socio-economic impact on society through its commitment to local suppliers that operate in the same geographical location where the purchase, service and invoicing's carried out, maintaining a commitment to local employment and the supply of local products and services (see Typology of suppliers - "Maintaining a sustainable value chain" for more information). [\(102-9\)](#)

TAX TRANSPARENCY.

	Country	2020	2021
Income from sales to third parties (thousands of euros)	Spain	307,053	281,029
	Colombia	-	-
	United States	-	-
Income from intra-group transactions with other tax jurisdictions (thousands of euros)	Spain	-	-
	Colombia	419	92
	United States	-	-
Tangible assets (thousands of euros)	Spain	60,675	60,251
	Colombia	1	1
	United States	-	-
Pre-tax profits ⁽¹⁾ (Thousands of euros)	Spain	163,086	159,223
	Colombia	62	(3)
	United States	-1,655	(1,205)
Tax Benefits (Thousands of euros)	Spain	41,757	40,548
	Colombia	3	2
	United States	0	0
Total tax contribution ⁽²⁾ (thousands of euros)	Spain	132,322	100,309
	Colombia	18	75
	United States	11	12

(1) The data on pre-tax profit recorded in this table correspond to the profit obtained individually by the group's companies in the country in which they have their registered office, excluding consolidation adjustments. Subsequently, the data expressed here differ from the data on pre-tax profit presented in the consolidated financial statements.

(2) This includes the taxes on its activities, which are an effective cost for the Company and its group, and the taxes collected and paid on behalf of other taxpayers because of the economic activity generated.

8.2. DISCLOSURE OF FINANCIAL KNOWLEDGE.

(203-1, 203-2)

Given the relevant role it plays in the financial markets, BME assumes as one more function the dissemination and disclosure of knowledge of matters related to the financial world in the most accessible and understandable way possible. For these purposes, BME subscribes to the recommendations and good practices for Financial Awareness and Education of the Organisation for Economic Cooperation and Development (OECD), which is reflected in the BME Group training centre, Instituto BME, whose activity is focused on the organisation of different training services related to finance and financial markets, which are aimed at professionals in the financial sector and its regulatory bodies, private investors, students and, in general, anyone interested in entering or delving into the world of finance.

Along these same lines, the BME Research Service prepares, filters, selects and distributes statistics on the BME Group's markets and systems, reports, and documentation on what is happening in the national and international financial markets.

The dissemination of financial knowledge and the increase in access to the financial culture of economic agents of any condition improve the protection of the rights of investors and allow a sustainable growth of the companies' business.

Thus, BME seeks to promote an improved understanding of the financial products, concepts and risks of Spanish households, small and medium-sized companies and all groups that make up society through information, training, instruction and advice, to facilitate the development of their skills and improve confidence to become more aware of financial risks and opportunities. BME's financial disclosure activity is articulated around four axes:

Financial education.



- BME regularly collaborates in the organisation and development of the Financial Education Day initiative framed in the Financial Education Plan, promoted by the Bank of Spain, the National Securities Market Commission (CNMV), the General Directorate of Insurance and Funds of Pensions and the General Secretariat of the Treasury and International Financing.



- It has organised the “Connect with the Stock Exchange” initiative, with 3 virtual conferences on sustainable finance attended by 188 people.



- It has collaborated with the Madrid City Council in the “Madrid, an open book” initiative, in which 32 financial training sessions have been held to date with schools for 1st and 2nd-year high school students.



- Collaboration in the organisation of the XII Economics Olympiad on economic training in the business environment.

Seminars, fairs and other activities related to the stock market.

BME collaborates, directly or indirectly, in carrying out:

- MedCap Forum and Latibex Forum.
- Spain Investors Day.
- Conference “Green Bonds” organised by OFISO.
- “Geneva MidCap Event”.
- “Spanish Small & MidCaps Conference”.
- Conference of the Royal Academy of Jurisprudence and Legislation.

Financial prizes in 2021. (*)

- It collaborated with the CFA Spain award that was held online.
- Participation in the III Rosa del Rio Award for Economic Journalism awarded at the Madrid Stock Exchange and the Manuel Olivencia Award.

(*) BME's participation in these prizes is considered in kind and consists of the transfer of spaces in the Company's facilities valued at 21,800 euros.

Financial / stock market training.

- Braindex, a new 100% online educational environment that offers courses, both paid and free, related to markets and financial products, disclosure, technology and regulation applied to the financial sector. These courses aim to promote financial and stock market culture among all types of students, whatever their previous level.
- BME collaborates, directly or through the BME Institute and the four Stock Exchanges, in training projects and teaches specific courses and seminars aimed at:



Universities (Málaga, Basque Country, San Pablo CEU, Cantabria, Castilla la Mancha, Zaragoza, Alcalá de Henares, Salamanca, Santiago, ISDE, UNED, Madrid Polytechnic).



Training institutions (University College of Financial Studies, EAE Business School, IEF, Fundación Maria Jesus Soto, and Fundación de Estudios Financieros).



Groups outside the sector (General Council of the Judiciary, National Police, General Directorate of Insurance and Pension Funds and the Casablanca Stock Exchange).

- BME collaborates with and/or organises other financial / stock market training initiatives such as, among others, the MFIA event and presentations or courses on various topics such as the ethics of finance, agile teams, the foreign exchange market, IPOs, cryptocurrencies, Latibex market, artificial intelligence and cloud architecture.

Sponsorship of financial publications.

BME contributes to the study and knowledge of the Spanish financial economy by promoting the dissemination of finance and securities markets through the direct publication of books or magazines and the sponsorship of various publications.



In 2021 BME launched Braindex and IBEX Gender Equality. It also held a “Ring of the Bell” for Financial Education Financial Education.

BME INVESTMENT IN ACTIONS THAT BENEFIT THE COMMUNITY.

(THOUSANDS OF EUROS)

	2020	2021
Financial culture and training	1,195	1,391(*)
Socio-economic development (Awards)	0,7	33

(*) The amount of 1,391 thousand euros, 139 thousand euros correspond to the assessment of scholarships in training programs. Likewise, it corresponds to the valuation of the non-monetary prizes consisting of training programs valued at 37 thousand euros.

8.3. PROMOTION OF LOCAL DEVELOPMENT. (203-2, 413-1)

Support for small and medium businesses.

BME provides companies with access to financing through the financial markets it manages, and, in particular, through BME MTF Equity and the Alternative Fixed Income Market (MARF), which seek to cover the financing needs of small and medium-sized Spanish companies.

In addition, companies have the comprehensive BME4Companies solution created by BME, which allows business managers to take advantage of the benefits of the securities markets through a wide and competitive range of services, as well as the Pre-Market Environment, a joint initiative of BME and Big Ban Angels, which consists of two segments, the initial one for start-ups and the growth segment for companies with a broader track record and which aims to facilitate the access of small and medium-sized companies to the capital markets and help them in the search for new investors.

As in previous years, BME has participated for yet another year, this time virtually, together with the Spanish Confederation of Small and Medium-Sized Enterprises in the CEPYME 500 project aimed at driving growth and promoting the downsizing of the 500 SMEs that lead the business growth in Spain.

Other community support activities.

The commitment to support the local community that BME was assuming continues, especially with regard to the world of culture, being a member of the Fundación de Amigos del Museo del Prado in Madrid, a sponsoring partner of the Reina Sofía Museum in Madrid, a member of the Board of Trustees of the Naval Museum Foundation and the National Archaeological Museum and patron of the Guggenheim Museum in Bilbao, among other institutions.

Likewise, in 2021, BME committed to the Food Bank of Madrid, the Luzón Foundation, the *Fundación Mujeres Soledad Cazorla*, the Red Cross and other initiatives of social value that contribute to the benefit of society and local community.

BME INVESTMENT IN ACTIONS THAT BENEFIT THE COMMUNITY.

(THOUSANDS OF EUROS)

	2020	2021
Financial sponsorship and promotion of cultural activities	150	150 (*)

(*) Of this amount, the total direct donations correspond to a total of 30 thousand euros.

8.4. SUPPORT AND AFFILIATION TO ASSOCIATIONS.

(102-12, 102-13)

	Holds position (1)	Participates in Project (2)	Is a member (3)	Makes contribution (4)
SPANISH ASSOCIATIONS AND INSTITUTIONS				
Spanish Association of Accounting and Business Administration	-	-	YES	-
Spanish Association of Financial Managers and Company Treasurers	-	-	YES	-
Financial Markets Association	-	YES	YES	-
European Finance Centre, Barcelona (BCFE)	-	-	YES	-
Círculo de Economía	-	-	YES	-
Catalan Institute of Economists	-	-	YES	-
Institute of Internal Auditors (IAI)	-	-	YES	-
Spanish Venture Capital & Private Equity Association (ASCRI)	-	-	YES	-
Alastría	YES	YES	YES	-
Spanish issuers	-	YES	YES	-
Association of electronic IT, Telecoms companies (AMETIC)	-	-	YES	-
Spanish Bioindustry Association (ASEBIO)	-	YES	YES	-
Foment del Treball Nacional	-	-	YES	-
FEF	YES	YES	YES	YES
Inverco	-	YES	YES	YES
Spanish Association of Financial Consultancy Firms (ASEAFI) ⁽⁵⁾	-	-	YES	-
Spanish Fintech and Insurtech Association ⁽⁵⁾	-	-	YES	-
Institute of Computer Technology ⁽⁵⁾	-	-	YES	-

	Holds position (1)	Participates in Project (2)	Is a member (3)	Makes contributxion (4)
SUPRANATIONAL ASSOCIATIONS AND INSTITUTIONS				
World Federation of Exchanges (WFE)	-	YES	YES	YES
Federation of European Stock Exchanges (FESE)	YES	YES	YES	YES
Ibero-American Stock Exchange Federation (FIAB)	YES	YES	YES	YES
European Capital Markets Institute (ECMI)	YES	YES	YES	-
International Organisation of Securities Commissions (OICV-IOSCO)	-	YES	YES	-
Centre for European Policy Studies (CEPS)	-	YES	YES	-
Futures Industry Association (FIA)	-	YES	YES	-
Spanish SWIFT Users Group (SWIFT GNUSE)	-	YES	YES	-
International Securities Services Association (ISSA)	-	-	SI	-
European Central Securities Depositories Association (ECSDA)	YES	YES	YES	-
Extensible Business Reporting Language (XRBL) Association	-	-	YES	-
Financial Services in Europe (EUROFI)	-	YES	YES	-
AFME – Securitisation Division (formerly: European Securitisation Forum)	-	-	YES	-
Financial Information Services Association of SIIA (FISD)	-	-	YES	-
European Association of CCP Clearing Houses (EACH)	YES	YES	YES	-
World Federation of Exchanges (WFE)	-	YES	YES	YES

(1) Associations or institutions at which a BME Group company serves on the governing body.

(2) Associations or institutions at which a BME Group company participates in projects or committees.

(3) Associations or institutions at which a BME Group company considers that being a member responds to a strategic decision.

(4) Associations or institutions to which a BME Group company makes a significant contribution of funds, mandatory member fees aside.

(5) Associations or institutions at which Openfinance considers that being a member responds to a strategic decision.

9. The differential value of good environmental management

- 9.1. The opportunity of environmental sustainability.
- 9.2. The commitment to good environmental performance.



Good management at the environmental level and the evaluation and mitigation of possible impacts is not only reduced to monitoring and calculating quantitative values on operating performance (emissions and energy consumption). Although these aspects are the most relevant for many companies, in the case of Grupo BME, maximising its positive environmental impact also focuses on supporting the development of sustainable finances and the redirection of funds towards environmentally responsible and sustainable activities and businesses.

Thus, during the 2021 financial year, Spain remained a leader in the issuance of green, social and sustainable bonds carried out by national entities through the markets managed by the BME Group, which supports and makes visible companies more sustainable.

However, BME is also aware of the potential environmental impact that its own operating processes and contracted transportation facilities or services may generate. Therefore, the Company dedicates economic resources to the management of its activities in a sustainable manner with the aim of minimising its energy consumption, adopting energy efficiency measures, and reducing/compensating its greenhouse gas emissions as much as possible. Likewise, in its relationship with its suppliers, BME promotes and facilitates compliance with environmental criteria.

BME'S ENVIRONMENTAL IMPACT IN FIGURES.



27 green, social and sustainable fixed-income issues admitted to trading for a value of 12,260 million euros.



2,235 tons of CO₂ equivalent emitted (scopes 1, 2 and 3).

9.1. THE OPPORTUNITY OF ENVIRONMENTAL SUSTAINABILITY.

BME considers environmental sustainability as a long-term opportunity and the financial markets as the epicenter of this global trend, which has one of its greatest exponents in the issuance of green, social and sustainable bonds that contribute, among other purposes, to preparing the transition towards a greener and more sustainable economy, by capitalising on business transformation projects and by financing the response of Public Administrations to the Covid-19 crisis through the issuance of social bonds.

BME, with its participation in the United Nations Sustainable Stock Exchanges (SSE) initiative, promotes, among other issues, the development of sustainable finance and the establishment of new listing segments, as well as the promotion of transparency in the dissemination of non-financial information, a determining aspect when directing investments towards more sustainable activities.

Thus, in the fixed income markets and platforms managed by BME, 27 fixed income issues of green, social and sustainable bonds formalised by large companies and medium and small capitalisation entities have been admitted to trading up to November, which has allowed Entities not only reduce the potential negative impact on their activity but also to take advantage of business opportunities, particularly those linked to the role of the financial sector in the transition to a low-carbon economy.

Lastly, BME believes that in 2022, the path of growth in sustainable financing will continue, thanks to the impetus of the authorities, the commitment of companies and financial market infrastructures such as BME and the growing demand for assets with investment criteria.

9.2. THE COMMITMENT TO GOOD ENVIRONMENTAL PERFORMANCE.

A) Environmental management approach.

The Company, which does not have certification of its Environmental Management System, reports its performance in environmental matters following the precautionary principle defined by the GRI Standards and principle 15 of the United Nations Rio Declaration on Environment and Development of 1992, indicating how it carries out its activities, as well as the intention to mitigate the possible environmental impacts derived from them through efficient environmental management. (102-11)

The branch activity of BME and the location of the different headquarters of the group companies in urban areas do not generate a significant direct impact on the environment; therefore, the Company has not considered aspects related to the management of its waste and materials, the biodiversity and sources of water collection in the surroundings of its facilities, the noise and light pollution that its facilities may generate, and the emissions of substances that deplete the ozone layer (SAO), carbon oxides, nitrogen (NOX), sulfur oxides (SOX) and other emissions.

In addition, given the activities in which the Group Companies are engaged, BME has analysed the risk factors related to their environmental performance within the framework of risk management and has verified that today the environmental risk derived from their activities is not significant and therefore it has no expenses, assets, provisions or contingencies of an environmental nature that could be significant in relation to its equity, financial situation and consolidated results.

Despite the foregoing, BME contributes to caring for the environment and dedicates economic resources to the management of its activities in a sustainable manner with the aim of minimising the possible environmental impacts derived from its own operating processes, facilities or contracted services. Among BME's action measures to mitigate possible environmental impacts, we can highlight (i) respect for current environmental legislation at the national, regional and local levels, as well as compliance with internal commitments; (ii) promotion of the reduc-

tion of resource consumption, both direct and indirect, and promotion of proper waste management and (iii) awareness raising and dissemination of good practices internally to promote employee awareness in environmental matters and externally through projects that promote socially responsible business practices.

The commitment and results of BME's efforts in environmental matters are evidenced by the creation in 2006 by BME together with the FTSE Group of the FTSE4Good IBEX index, which is made up of securities belonging to BME's IBEX 35® index that meet the criteria of good practice in corporate social responsibility. Although the index initially had 27 companies, at the end of the 2021 financial year the figure rose to 46 entities.

Likewise, in line with previous years, in 2021 BME has not received any significant fine or financial sanction for non-compliance with regulations related to environmental aspects. (307-1)

B) Emissions and climate change. (201-2)

The Company makes efforts to minimise the greenhouse gas emissions it generates by monitoring its emissions and adopting energy-saving measures with the ultimate goal of keeping its carbon footprint stable, without the Company having voluntary targets in the reduction of greenhouse gas emissions.

BME considers the management through Iberclear of the National Registry of Greenhouse Gas Emission Rights (RENADE) to be an opportunity derived from climate change, which since 2005 has supported the National Administrator of Emission Rights, meeting all the requirements of the European Commission and the United Nations through the Spanish Office for Climate Change (OECC). RENADE is the instrument with which the publicity and permanent update of the ownership and control of the greenhouse gas emission rights of companies in Spain is ensured, keeping the accounting, registration and custody of the emission rights and other deposited units.

C) Greenhouse gas emissions indicators. (102-48, 305-1, 305-2, 305-3, 305-4)

GREENHOUSE GAS EMISSIONS IN SPAIN.

TONNES OF CO₂ EQUIVALENT ⁽¹⁾

	2020 ⁽²⁾	2021
TOTAL CO₂ EMISSIONS	1,597.86	2,234.89
Total direct emissions	30.58	26.75
Fuel consumption (natural gas)	1.33	1.02
Staff transport (corporate shuttle bus)	29.25	25.73
Total indirect emissions	1,567.28	2,208.14
Electricity consumption ⁽³⁾	1,292	2,123
Business trips (by air)	72.20	8.58
Business trips (by rail) ⁽⁴⁾	8.08	1.44
Staff commutes to and from work (own vehicle)	195	75
TOTAL NUMBER OF EMPLOYEES IN SPAIN ⁽⁵⁾	793	803
TOTAL CO₂ EMISSIONS PER EMPLOYEE	2.01	2.78

(1) The CO₂-equivalent emission factors provided by DEFRA were used as the method for calculating CO₂, CH₄ and N₂O emissions.

(2) The CO₂ emissions for 2020 have been amended to update the estimated emissions data on electricity consumption for the second half of 2020 for the Barcelona Stock Exchange, which were estimated in the Consolidated Non-Financial Information Statement of BME for 2020 fiscal year.

(3) The CO₂ emissions for electrical energy for the 2020 fiscal year were calculated by applying the estimated value of the gross electricity production mix for 2020 (0,144 Kgs CO₂ per kWh) and the CO₂ emissions for electrical energy for the 2021 fiscal year by applying the estimated value of the gross electricity production mix for 2021 (0,250 Kgs CO₂ per kWh).

The calculation of emissions derived from electricity for the 2020 fiscal year was updated after incorporating the emissions derived from the final electricity consumption of the Barcelona Stock Exchange for 2020, now including the electricity consumption data for the second half of the 2020 fiscal year in an estimated manner in the BME Consolidated Non-Financial Information Statement for the 2020 fiscal year. Likewise, the calculation of emissions derived from electricity for the 2021 fiscal year took into account the electricity consumption data of the Madrid, Bilbao and Valencia offices and the data of electricity consumption at the Barcelona headquarters for the first half of 2021 and an estimate of the electricity consumption data for the second half of 2021 based on data from the last five years.

(4) Includes indirect emissions relating to business trips made by employees by train (does not include trips made by employees by train to the Majadahonda railway station to take the company shuttle services to the Las Rozas headquarters).

(5) The number of employees includes data on the BME Group workforce (with the exception of BME Latam SAS and LATAM Exchanges Data Inc.) and Open Finance, S.L.U. as at 31 December of each year.

GREENHOUSE GAS EMISSIONS IN SPAIN. (305-1, 305-2, 305-3)

Scope	Item	2020	2021
Scope 1	Fuel consumption (natural gas)	1.33	1.02
	Staff transport (corporate shuttle bus)	29.95	25.73
Scope 2	Electricity consumption	1,292 ⁽¹⁾	2,123 ⁽²⁾
	Business trips (by air and rail)	80.28	10.02
Scope 3	Staff commutes to and from work (own vehicle)	195	75

(1) The emissions derived from the electricity consumption for 2020 were amended to update the emissions data on electricity consumption for the second half of 2020 for the Barcelona Stock Exchange, which were included in an estimated manner in the BME Consolidated Non-Financial Information Statement corresponding to 2020 fiscal year.

(2) The emissions derived from the total electricity consumption of the Madrid, Bilbao and Valencia headquarters are included. For the Barcelona headquarters, the data on emissions derived from electricity consumption for the first half of 2021 and an estimate of the data for the second half of 2021 based on data from the last five years are included.

D) Other environmental impacts: energy consumption.

(302-1, 302-3, 302-4, 302-5)

The Company, in its commitment to the environment and sustainability, carries out actions both internally, aimed at achieving lower energy consumption in its facilities and minimising the environmental impacts of the services managed in the Group's work centres, and externally, through environmental support initiatives.



Internal Energy Consumption. (302-1)

Internal energy consumption is that derived from the contracting by BME of electricity and gas for the performance of internal activities, without BME expressly purchasing energy from renewable sources. On the other hand, natural gas consumption is generated only in the canteen for employees at the Las Rozas headquarters (Madrid), whose services are outsourced.

Internal consumption reduction measures.

BME promotes different measures with the aim of reducing its electricity consumption and thereby reducing the emissions derived from its activity, mainly from its lighting and air conditioning systems and technological assets.

These measures include low-consumption and intelligent lighting systems, the replacement of equipment in air conditioning systems or maintenance activities and removal of office equipment for more efficient ones that have energy efficiency guarantees (such as Energy Star certification).



External Energy Consumption.

External energy consumption is that which occurs outside of BME and whose energy is not contracted directly by the Company. This consumption comes mainly from employees commuting to the workplace (corporate bus and private vehicle) and company trips (plane and train). As data on external energy consumption are not available, no indicators are included.

External consumption reduction measures.

BME does not monitor external energy consumption but carries out the implementation of saving measures that entail a reduction in the emissions generated in the development of its activity, among which is the promotion of sustainable travel through public transport instead of private transport (expansion of the shuttle service and economic aid for its use for urban and interurban means of transport), priority in the use of the train to the plane in short-distance business trips, promotion of technological communication tools as a means for the celebration of meetings and telecommuting.

ELECTRICITY CONSUMPTION INDICATORS BY GEOGRAPHIC AREA IN SPAIN. ^{(1) (2)}

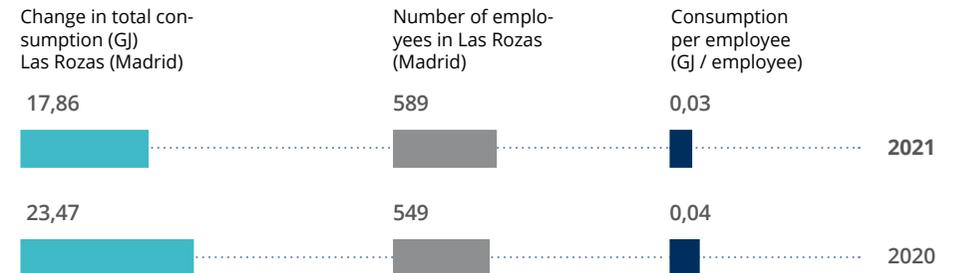
Madrid	2020	2021
Change in total consumption (GJ)	27,799.08	26,598.63
Number of employees in Madrid	613	645
Consumption per employee (GJ / employee)	45.35	41.24
Barcelona	2020	2021
Change in total consumption (GJ)	2,739.05 ⁽³⁾	2,221.22 ⁽⁴⁾
Number of employees in Barcelona	78	73
Consumption per employee (GJ / employee)	35.12 ⁽³⁾	30.43 ⁽⁴⁾
Bilbao	2020	2021
Change in total consumption (GJ)	1,228.01	1,271.90
Number of employees in Bilbao	27	25
Consumption per employee (GJ / employee)	45.48	50.88
Valencia	2020	2021
Change in total consumption (GJ)	533.95	481.22
Number of employees in Valencia	75	60
Consumption per employee (GJ / employee)	7.12	8.02

(1) Electricity consumption figures of the fiscal years are reported in Gigajoules (GJ), as per GRI4 criteria. 1 kWh=0,0036 GJ.

(2) The number of employees includes data on the BME Group workforce (with the exception BME Latam SAS and LATAM Exchanges Data Inc.) and Open Finance, S.L.U. as of 31 December of each year.

(3) The energy consumption for the Barcelona office for 2020 and the consumption per employee for this period have been amended to include the data on estimated electricity consumption of the second half of 2020 in the BME Consolidated Non-Financial Information Statement for fiscal year 2020.

(4) The energy consumption for the Barcelona office for 2021 and the consumption per employee for this period include the data on estimated electricity consumption of the first half of 2021 of the operating headquarters of the Barcelona Stock Exchange and an estimate of the electricity consumption data for the second half of 2021 based on the consumption of the last five years.

GAS CONSUMPTION INDICATORS IN SPAIN. ^{(1) (2) (3)} (302-1, 302-3)

(1) In Madrid, only the Las Rozas headquarters is supplied with this type of energy.

(2) The number of employees in Las Rozas (Madrid) includes data on the workforce belonging to the BME Group (except BME Latam SAS and LATAM Exchanges Data Inc.) and to Openfinance as of 31 December of each year located in these offices.

(3) Gas consumption data for the years are included in Gigajoules (GJ) according to the criteria defined by GRI4.

GENERAL ENERGY INDICATORS IN SPAIN. ⁽¹⁾⁽²⁾ (302-1, 302-3)

	2020	2021
Total internal energy consumption (GJ)	32,323.56 ⁽³⁾	30,590.83 ⁽⁴⁾
Total number of employees in Spain ⁽⁵⁾	793	803
Total internal energy intensity (GJ / employee)	40.76	38.10

(1) Total electricity and gas consumption data for the years are included in Gigajoules (GJ) according to the criteria defined by GRI4. 1 kWh=0.0036 GJ.

(2) To calculate the annual internal energy intensity of the Company, the total internal energy consumption (electricity and gas) was divided by the number of employees of the BME Group (except BME Latam SAS and LATAM Exchanges Data Inc) and of Openfinance on 31 December of each financial year.

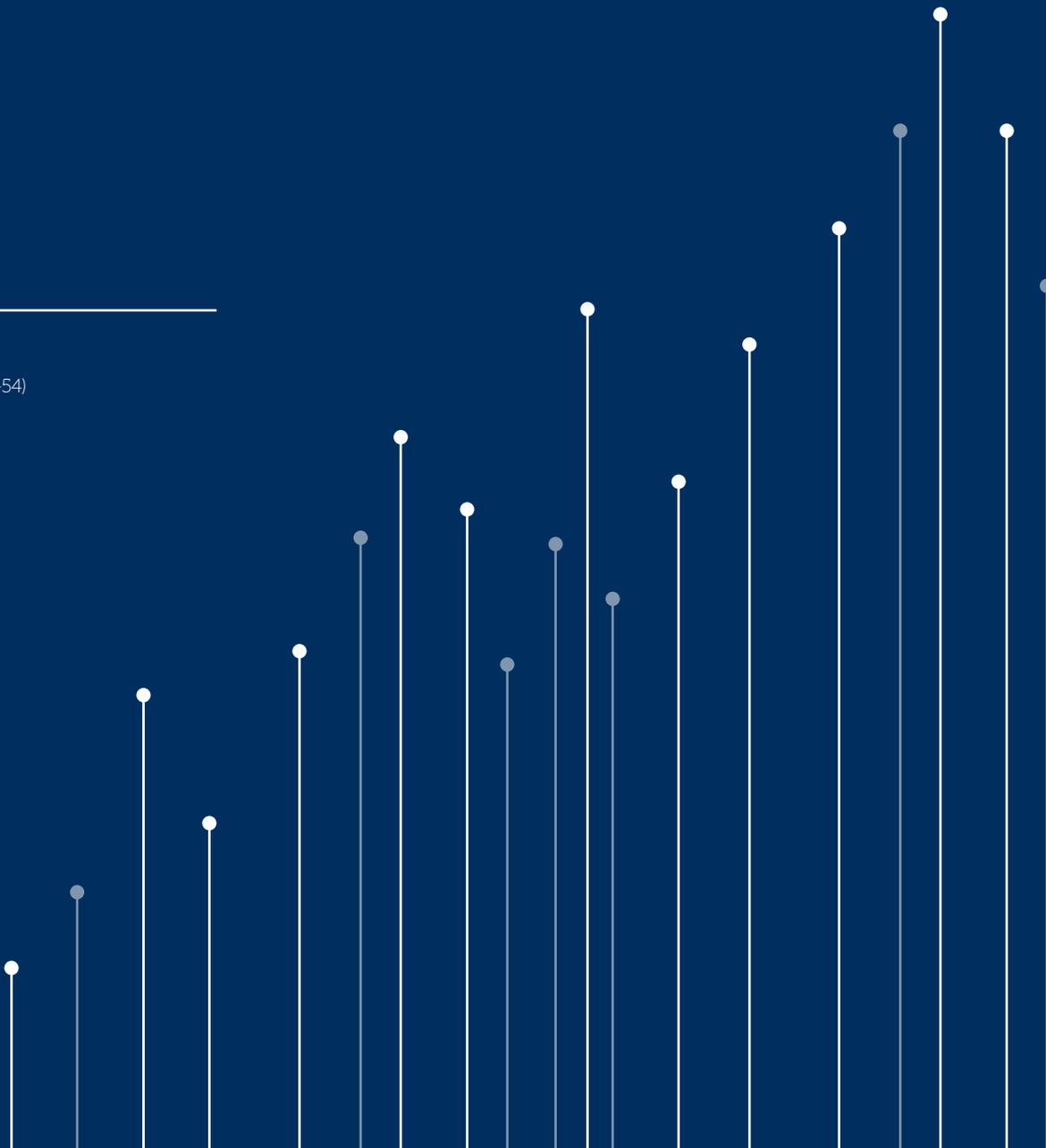
(3) The total figures for internal electricity consumption and the total internal energy intensity per employee were modified after updating the electricity consumption data from the Barcelona Stock Exchange for the second half of 2020, which was estimated in the State of Consolidated Non-Financial Information of BME for the year 2020.

(4) Total electricity consumption data for the Madrid, Bilbao and Valencia offices are included. For the Barcelona headquarters, the data for the first half of the 2021 financial year and an estimate of the electricity consumption data for the second half of the 2021 financial year are included, based on the consumption of the last 5 years.

(5) Includes the number of employees of the BME Group workforce (except BME Latam SAS and LATAM Exchanges Data Inc) and of Openfinance as of 31 December of each year.

10. Coverage of this report

(102-46, 102-54)



Scope of information and standards used in the report.

This consolidated non-financial information statement, which includes information relating to the year 2021 for all activities and services provided by the Company, was prepared in accordance with the essential option established by the methodology for preparing GRI Standards Sustainability Reports and the Law 11/2018 of December 28, which modifies the Commercial Code, the consolidated text of the Capital Companies Law and the Accounts Audit Law in matters of non-financial information and diversity. Where it was considered appropriate, information for the 2020 financial year was included to facilitate comparability.

The structure and content of this report is based on the principles established by GRI for the preparation of sustainability reports (participation of stakeholders, sustainability context, materiality and exhaustiveness) and for its development the principles of balance, comparability, accuracy, punctuality, clarity and reliability established by GRI to guarantee the quality of the information have been taken into account.

Materiality analysis. (102-46, 102-47, 103-1)

In accordance with the GRI Standards, this document includes information on the indicators corresponding to those aspects of sustainability that have been considered material. Thus, notwithstanding the fact that the integration process between BME and SIX, which began in the last quarter of financial year 2020, continued during financial year 2021, it has been considered appropriate to review BME's materiality analysis and matrix for 2021, in accordance with the methodology included in this report, with the aim of, among others, reviewing the content of the material aspects for BME for the year 2021, through the identification of those environmental, social and good governance aspects that are material for BME for being related to its activity during the 2021 financial year and are likely to generate positive and/or negative impacts. Along these lines, efforts have also been made to verify the alignment of the material aspects of SIX and BME and their level of priority as reflected in BME's materiality matrix for the 2021 financial year.

As a consequence of the foregoing, the materiality matrix was updated so that the material aspect related to shareholders was eliminated, as there was a single shareholder during the 2021 financial year after the acquisition of BME by SIX and it ceased to be an interest group. Likewise, the relevance of the material aspects that were renamed as "Centre for sustainable finance" and "Health, safety and well-being of employees" was increased and the detail of several material aspects was expanded and specified for the purpose of updating the positive impacts it generates on stakeholders, and the categories of the material aspects of BME and SIX were aligned for which the economic category of BME was extended to the "economic and operational dimension" and was included in this new category, the management of clients that were in "Ethics, good governance and relationship with Stakeholders" (the latter becomes "Ethics and good governance").

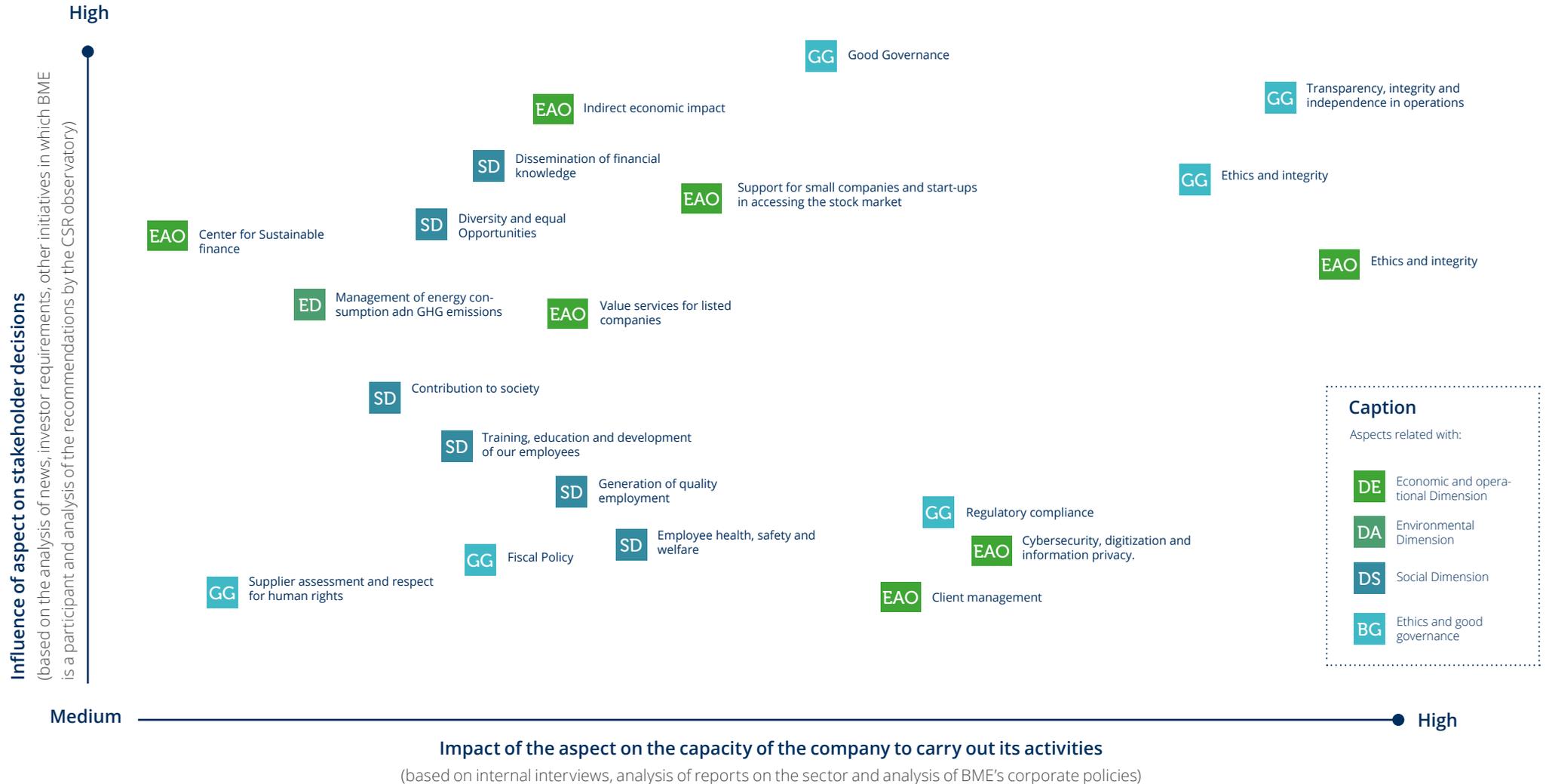
Similarly, as a consequence of the analysis of the alignment of the materiality of BME and SIX, it was verified that the most relevant material aspects for BME and SIX have coincided during 2021 with the exception of the aspect “Low transaction cost: Inexpensive, efficient financial infrastructure” identified as material by SIX and which, as in the materiality alignment analysis of BME and SIX carried out in 2020, is not considered material for BME because it is not relevant for its stakeholders and because it is not a matter that is present in the company’s regular activities.

Specifically, the activities carried out to prepare the materiality analysis and its review during the 2021 financial year consisted of:

- **Meetings** with managers and directors of the key areas of the Company.
- **Benchmarking** of other international companies in the stock market sector.
- **Analysis of investor requirements regarding corporate social responsibility** based on the analysis of the contents/indicators requested by initiatives such as the Dow Jones Sustainability Index (DJSI) and the Carbon Disclosure Project (CDP).

- **Analysis of the key aspects of corporate social responsibility in other initiatives in which BME participates** such as the Sustainability Stock Exchange (SSE) and the United Nations Global Compact.
- **Analysis of the recommendations for the Company’s reporting formulated by the Corporate Social Responsibility Observatory.**
- **Analysis of the press dossiers** compiled by the Company in the last year.
- **Analysis of BME’s Corporate Policies** – among others, the Corporate Social Responsibility Policy, the Code of Conduct, Principles for the Prevention of Crimes and Tax Policies and Principles.

The result of these actions has made it possible to prepare the materiality matrix included below: (102-47)



Once the material aspects were identified, the compilation of information to prepare the report was carried out based on interviews and the compilation of information from those responsible for the Company. BME prepared the final version of this report using the data received and the background information obtained through the activities carried out in the materiality analysis. In the GRI content table included in the last section, reference is made to the sections where you can find information on each of the indicators requested by said international framework.

In those cases in which it was not possible to cover all the requirements of the guide when reporting a certain indicator, this circumstance was stated in the same table. The Company also assumes a commitment to improve its information systems in order to have the data requested in future editions of the report available.

Finally, it is stated that the data on electricity consumption and greenhouse gas emissions for the geographical area of Barcelona for the 2020 financial year, which were not available as of 31 December 2020, have been modified. (102-48)

Scope of the consolidated non-financial information statement for 2021. (102-45)

The consolidated non-financial information statement for 2020 includes the details of BME Group companies whose financial statements are consolidated under the full consolidation method; therefore, the financial details of REGIS-TR, Société Anonyme and REGIS-TR UK Ltd and LATAM Exchanges Data México S.A de C.V. have not been included. They have been consolidated under the equity method, as they are 50% and 49%, respectively, owned by BME Group companies.

In turn, the employee details included in this consolidated non-financial information statement correspond to the workforce of the BME Group and, with a view to increasing transparency in the disclosure of non-financial and diversity information, to the employees of Open Finance, SLU, a company whose employment system is handled independently from the rest of the BME Group's employees.

Contact point for questions about the report. (102-53)

If you would like any further clarification regarding the information included in this document, or on the Company's activities concerning sustainability, you may contact BME at the following address: sconsejo@grupobme.es

Index of Non-Financial Information contents



Law 11/2018, of 28 December on non-financial information	GRI Standards	Description	Headings of this report / Other reports	Page(s)
Business model				
Description of the business model	102-2	Activities, brands, products and services	1	12
			3	25-26
Business environment	102-3	Head office location	2	20
	102-4	Place of operations	2	18-22
Active markets	102-6	Markets served	2	22
Organisation and structure	102-7	Size of the organisation	Annual accounts	
			1	13
Objectives and strategy	102-14	Statement of decision-making senior executives	Letter from the Chairman	7-8
			Letter from the CEO	9-10
Main factors and trends that might affect future performance	102-15	Main impacts, risks, and opportunities	3	26-28
			5.3	42
Group policies and results				
Description of the policies applied by the Group and their results	102-15	Main impacts, risks, and opportunities	3	26-28
			5.3	42
Short-, medium- and long-term risks				
Short-, medium-, and long-term risks	102-15	Main impacts, risks and opportunities	Annual accounts	
			5.3	42
Key performance indicators for non-financial results (KPIs)				
Non-financial Key performance indicators that are relevant to the specific business activity and meet the criteria of comparability, materiality, relevance, and reliability	102-54	Statement of preparation of the report in accordance with <i>GRI Standards</i>	10	82

Law 11/2018, of 28 December on non-financial information	GRI Standards	Description	Headings of this report / Other reports	Page(s)
I. Information on environmental issues.				
Global environment				
	103	Management approach: Economic performance	9	74-80
Resources dedicated to prevention of environmental risks	308-1	New suppliers that have passed the evaluation and selection filters in accordance with the environment criteria	6.1	46
	307-1	Non-compliance with environmental legislation and regulations	9.2	76
Precautionary principle	102-11	Principle or precautionary approach	9.2	76
Effects of the company's activities on the environment	103	Management approach: Economic performance	9.2	76-80
	201-2	Financial implications and other risks and opportunities due to climate change	9.2	76
Annual accounts				
Pollution				
Air pollution	103	Management approach: Emissions	9.2	76-80
Light and noise pollution		Non-material indicator for the Group as derived from the materiality analysis		
Measures to prevent, reduce, or offset carbon emissions	305-5	Reduction of GHG emissions	9.2	76-80
Circular economy and waste prevention and management				
Circular economy, waste, and action to combat food waste		Non-material indicator for the Group as derived from the materiality analysis		



BME contributes to the **care of the the environment** and dedicates resources to manage its activities in a sustainable in a sustainable manner

Law 11/2018, of 28 December on non-financial information	GRI Standards	Description	Headings of this report / Other reports	Page(s)
Sustainable resource use				
Water consumption		Non-material indicator for the Group as derived from the materiality analysis		
Consumption of raw materials		Non-material indicator for the Group as derived from the materiality analysis		
	103	Management approach: Energy	9.2	76-80
	302-1	Energy consumption within the organisation	9.2	78-80
Energy consumption and measures to improve efficiency and use of renewable energies	302-2	Energy consumption outside the organisation	BME has not calculated the organisation's external energy consumption	
	302-3	Energy intensity	9.2	78-80
	302-4	Reduction of energy consumption	9.2	78-79
	302-5	Reduction in energy requirements of products and services	9.2	78
Climate change				
	103	Management approach: Emissions	9.2	76-80
Greenhouse Gas Emissions	305-1	Direct GHG emissions (scope 1)	9.2	77
	305-2	Indirect GHG emissions from energy generation (scope 2)	9.2	77
	305-3	Other indirect GHG emissions (scope 3)	9.2	77
	305-4	Intensity of GHG emissions	9.2	77
Measures to adapt to the consequences of climate change reduction goals	103	Management approach: Economic performance	9.2	76-80
	201-2	Financial implications and other risks and opportunities due to climate change	Annual accounts 9.2	76

Law 11/2018, of 28 December on non-financial information	GRI Standards	Description	Headings of this report / Other reports	Page(s)
II. Information on personnel and social welfare issues.				
Employment				
	103	Management approach: Employment	7	50-66
Total number of employees and distribution	102-8	Information on employees and other workers	7.1	50, 52-54
	405-1	Diversity in governing bodies and employees	5.1	33
			7.1	50, 52-54
Total number and distribution of contract types	102-8	Information on employees and other workers	7.1	52-54
Annual average permanent, temporary and part-time contracts	102-8	Information on employees and other workers	7.1	50, 54
	405-1	Diversity in governing bodies and employees	7.1	50, 54
Employees with disabilities	405-1	Diversity in governing bodies and employees	7.1	54
Number of dismissals	401-1	New employee hires and staff turnover	7.4	64
	102-35	Remuneration policies	Director remuneration policy 5.1	35
Average remuneration of directors and executives			Director remuneration policy	
	102-36	Processes for determining remuneration	5.1	35
			7.4	61
Average remuneration and its evolution				
Wage gap	405-2	Percentage increase ratio of the total annual compensation	7.2	55
Work disconnection policies	103	Base salary and remuneration ratio of women compared to men	7.4	64

Law 11/2018, of 28 December on non-financial information	GRI Standards	Description	Headings of this report / Other reports	Page(s)
Organisation of work				
Organisation of working time and measures to facilitate work-life balance	103	Management approach: Employment	7.4	56-59
Number of hours of absenteeism	403-9	Work-related injuries	7.3	57
Health and safety				
	103	Management approach: Occupational health and safety	7.3	56-59
	403-1	Occupational health and safety management system	7.3	56
	403-2	Hazard identification, risk assessment and incident investigation	7.3	56
Occupational health and safety conditions	403-3	Occupational health services	7.3	56
	403-5	Worker training on occupational health and safety	7.3	58
	403-6	Promotion of worker health	7.3	56
	403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	7.3	56
Work accidents	403-9	Work-related injuries	7.3	56-57
Occupational diseases	403-10	Work-related ill health	The professions carried out by BME employees do not have a high incidence or risk of disease 7.3	56-57

Law 11/2018, of 28 December on non-financial information	GRI Standards	Description	Headings of this report / Other reports	Page(s)
Workforce relations				
Dialogue with workers	103	Management approach: Freedom of association and collective bargaining	BME guarantees all its employees the right to freely organise for the promotion and defence of their economic and social interests. The union representation bodies of the workers and the technical committees derived from the Collective Agreement in which the employees participate constitute a channel of constant dialogue between the Company and the employees aimed not only at collective bargaining but also at the resolution of possible conflicts that may arise.	
	407-1	Operations and suppliers whose right to freedom of association and collective bargaining may be at risk		
Employees covered by collective bargaining agreement	102-41	Collective bargaining agreements	7.5	66
Balance of collective agreements, particularly in relation to occupational health and safety	403-4	Worker participation, consultation, and communication on occupational health and safety	In the Health and Safety Committees listed in section 5.6 of this report, BME deals with all matters that it considers relevant in this area: among others, social insurance, occupational risk prevention, safety measures, and drills.	
Training				
Policies implemented	103	Management approach: Training and education	7.4	61-64
	404-2	Programmes to improve employee skills and programmes to aid in the transition	7.4	61-64
Total training hours	404-1	Average training hours received per employee per year	7.4	63
Universal accessibility for people with disabilities				
Universal accessibility for people with disabilities	103	Management approach: Diversity and equal opportunities	7.2	54-55
Equality				
Equality policy and plans and measures adopted	103	Management approach: Diversity and equal opportunities	7.2	54-55

Law 11/2018, of 28 December on non-financial information	GRI Standards	Description	Headings of this report / Other reports	Page(s)
III. Information on respect for human rights.				
Elimination of forced and compulsory labour		Non-material indicator for the Group as derived from the materiality analysis		
Effective abolition of child labour		Non-material indicator for the Group as derived from the materiality analysis		
Elimination of discrimination in employment	103	Management approach concerning Employment and Diversity and Equal Opportunities	7.2	54-55
	406-1	Cases of discrimination and corrective actions taken	7.2	54-55
Complaints filed regarding human rights violations	407-1	Operations and suppliers whose right to freedom of association and collective bargaining may be at risk	There are no significant centres or suppliers in which there is a risk of infringement or threat to freedom of association and the right to benefit from collective agreements	
Promotion and compliance with the provisions of the fundamental Conventions of the International Labour Organisation				
Due diligence procedures	412-1	Operations subject to human rights reviews or impact assessments	6.1	48
	412-3	Significant investment agreements and contracts that include human rights clauses or that are subject to human rights screening	6.1	48
	102-16	Values, principles, standards and code of conduct	5.2	37-38
	102-17	Mechanisms for advice and ethical concerns	5.2	37-38

Law 11/2018, of 28 December on non-financial information	GRI Standards	Description	Headings of this report / Other reports	Page(s)
IV. Information relating to the fight against corruption and bribery				
Measures adopted in the fight against corruption and bribery	103	Management approach: Anti-corruption	5.2	36-41
	205-1	Operations evaluated for risks relating to corruption	5.2	37-38
	205-2	Communication and training on anti-corruption procedures and policies	5.1	34
		5.2	37-38	
205-3	Confirmed incidents of corruption and actions taken	5.2	37-38	
Measures to combat money laundering	205-2	Communication and training on anti-corruption procedures and policies	5.1	34
			5.2	37-38
Contributions to foundations and not-for-profit entities	413-1	Operations with the participation of the local community, impact assessments and development programmes	8.3	72
V. Information on the company				
Commitment of the company to sustainable development				
Impact on local development and employment	103	Management approach: Indirect economic impacts	8.1, 8.2 y 8.3	68-72
	203-1	Investments in infrastructures and support services	8.2	70
	203-2	Significant indirect economic impacts	8.2	70
			8.3	72
	204-1	Proportion of spending on local suppliers	6.1	46
413-1	Operations with the participation of the local community, impact assessments, and development programmes	8.3	72	

Law 11/2018, of 28 December on non-financial information	GRI Standards	Description	Headings of this report / Other reports	Page(s)
Impact on the local population and area	413-1	Operations with the participation of the local community, impact assessments, and development programmes	8.3	72
	413-2	Operations with significant actual or potential negative impacts on society	8	68-73
Relations with actors from society	102-43	Focal areas for the participation of stakeholders	BME guides the frequency in the relationship with its main stakeholders based on the needs of the business. Regarding the preparation of the report, BME has taken into account the main expectations mentioned by these stakeholders. To this end, information and opinions were requested from those responsible for the Company with whom we have worked to define the contents of the report.	
			2	23
Association and sponsorship actions	102-12	External initiatives	1	17
	102-13	Membership of associations	1	17
			8.4	73
Subcontracting and suppliers				
Inclusion in the purchasing policy of social, gender equality and environmental issues	103	Management approach: Social and environmental assessment of suppliers		
Consideration in relationships with suppliers and subcontractors of their social and environmental responsibility	103	Management approach: Social and environmental assessment of suppliers	6.1	45-47
	308-1	New suppliers that have passed the evaluation and selection filters in accordance with the environment criteria		
Supervision systems and audits and their results	102-9	Supply chain		
	414-1	New suppliers that have passed the evaluation and selection filters in accordance with the social criteria	6.1	46-47

Law 11/2018, of 28 December on non-financial information	GRI Standards	Description	Headings of this report / Other reports	Page(s)
Consumers				
Measures for the health and safety of consumers	103	Management approach: Client health and safety		40
Claims systems, complaints received and their resolution	103	Management approach: Client health and safety	5.1, 6.2	
	416-2	Cases of non-compliance relating to the health and safety impacts of the categories of products and services		48
Tax information				
Profit obtained country by country and tax on profits	103	Management approach: Economic performance	5.2	39
	207-1	Tax approach	5.2	39-40
	207-2	Tax governance, control, and risk management	5.2	39
			Annual accounts	
	207-3	Participation of stakeholders and management of tax concerns	The contents of the report respond to the concerns, opinions, and preoccupations in relation to taxation expressed by BME's stakeholders on the occasion of the materiality analysis of BME that was expressed with the adherence of the BME Group companies to the Code of Good Tax Practices that entails the defence of public policies in fiscal matters	
	207-4	Country-by-country reporting	8.1	69
	201-1	Direct economic value generated and distributed	Annual accounts	
3			28	
Public subsidies received	201-4	Financial aid from the government	5.2	39
			5.2	41

Law 11/2018, of 28 December on non-financial information	GRI Standards	Description	Headings of this report / Other reports	Page(s)
Other significant information				
Other information about the Company				
	103	Management approach: Unfair competition, public policy, and social and economic compliance	5.2	37-38
	102-1	Name of the organisation	Cover page	
	102-5	Ownership and legal form	2	20
	102-10	Significant changes in the organisation and its supply chain	2	19-20
			6.1	45-46
Other information about the Company	206-1	Legal actions related to anti-competitive behaviour, anti-trust, and monopoly practices	There were no lawsuits for unfair competition, monopolistic practices or against free competition 5.2	37-38
	415-1	Donations to political parties/representatives	5.2	41
	418-1	Fundamental complaints associated with breaches of client privacy and losses of client data	There were no complaints in relation to respect for privacy and the loss of personal customer data Annual accounts	
	419-1	Non-compliance with laws and regulations in social and economic areas	5.2	38
			7	50

Law 11/2018, of 28 December on non-financial information	GRI Standards	Description	Headings of this report / Other reports	Page(s)
Corporate Governance				
	102-18	Governance structure	5.1	32-34
	102-19	Delegation of authority	5.1	32-34
	102-20	Responsibility at executive level for economic, environmental, and social matters	5.1	32-34
	102-22	Composition of the most senior governing body and its committees	5.1	32-34
	102-23	Chairperson of the most senior body	5.1	32-34
Corporate Governance	102-24	Nomination and selection of the most senior governing body	Corporate bylaws and internal development regulations	
	102-25	Conflicts of interest		
	102-26	Function of the most senior governing body in the selection of objectives, values, and strategy		
	102-27	Collective knowledge of the most senior governing body		BME's directors have received training in economic, social, and environmental matters in the exercise of their duties in the development of the meetings of the Board of Directors and the Audit and Risk Committee held on the occasion of the last materiality analysis of 2021 carried out and the approval of this report.
	102-28	Evaluation of the most senior governing body		Board of Directors annually evaluates the efficiency of its operation and the quality of its work and that of its delegated committees in relation to the powers that constitute the scope of its action.

Law 11/2018, of 28 December on non-financial information	GRI Standards	Description	Headings of this report / Other reports	Page(s)
Corporate Governance	102-29	Identification and management of economic, environmental and social impacts	5.2	37-38
			5.3	41-42
	102-30	Efficiency of the risk management processes	5.2	37
			5.3	42
	102-31	Review of economic, environmental and social issues	Board of Directors and the Audit and Risk Committee evaluate, at least annually, the economic, environmental, and social aspects and their impacts, risks, and opportunities.	
	102-32	Role of the highest governance body in the preparation of sustainability reports	Board of Directors is the body that approves the Non-Financial Information Statement.	
	102-33	Communication of critical concerns to the highest governance body	2	22
	102-34	Nature and total number of ethical concerns	5.3	42-43
	102-45	Entities included in the consolidated financial statements	Annual accounts	
2			20	
			10	85

Law 11/2018, of 28 December on non-financial information	GRI Standards	Description	Headings of this report / Other reports	Page(s)
Stakeholder engagement				
	102-40	List of stakeholders	2	23
	102-21	Consultation with stakeholders on economic, environmental, and social matters	Through its Audit and Risk Committee, it is informed of all relevant economic, environmental and social issues that have arisen in the Company's dialogue with its stakeholders and the areas, units, and departments involved in its relationship with them.	
Stakeholder engagement	102-42	Identification and selection of stakeholders	The selection of the interest groups was made based on the criteria of relevance for the Company and its activities.	23
	102-44	Focal areas for the participation of stakeholders Key topics and concerns mentioned	Report only incorporates information regarding the satisfaction surveys in relation to the training activities.	
		Key topics and concerns mentioned	Contents of the report respond to the main expectations expressed by BME's stakeholders. As a result of the interaction with these stakeholders, no problems that the company considers key have been detected.	

Law 11/2018, of 28 December on non-financial information	GRI Standards	Description	Headings of this report / Other reports	Page(s)
Other useful information on the preparation of the document				
	103-1	Management approach: Explanation of the material topic and its Coverage	10	82
	102-46	Definition of the report content and Coverage given to topic	10	81-82
	102-47	List of material topics	10	82-85
	102-48	Restatement of information	9.2	77
			10	85
Other useful information on the preparation of the document	102-49	Reporting Changes	There are no significant changes in relation to the scope and coverage of the material aspects identified in this report with respect to the Sustainability Reports published in previous years.	
	102-50	Reporting period	2021	
	102-51	Date of last report	2020	
	102-52	Reporting cycle	Annual	
	102-53	Contact point for questions about the report	10	85
	102-55	GRI content index	Non-financial information content index	
	102-56	External verification	The Company has requested an independent review of the consolidated non-financial information statement.	
	Other additional information			
Centre for Sustainable Finance	103-1	Management approach: Explanation of the material issue and its boundary	1	15
			3	26



www.bolsasymercados.es

info@grupobme.es

Tel. +34 91 589 14 07

Plaza de la Lealtad, 1
Palacio de la Bolsa | 28014 Madrid

Follow us on:

