

# Non-Financial Information Statement 2023



## Summary of the Key Moments of 2023

Below are the main milestones of BME for the year 2023, grouped in the pillars of the SIX sustainability strategy (refer to Section 1.1 for more information).



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## Letter from the Chairman (2-22)

Dear reader,

We present the BME Non-Financial Information Statement for 2023 in which we outline our commitment to transparency and responsible business conduct and highlight the main milestones of the year in terms of sustainability.

BME operates critical financial market infrastructures under the roof of SIX, the third largest exchange group in Europe by free float market capitalization. With our products and services we are contributing to the proper functioning of the markets and, by extension, to economic stability. To be a reliable partner to all our stakeholders is very important to us. We want to integrate sustainability into the financial market infrastructure, enabling the efficient flow of capital to sustainable organizations and investments and thus a just transition.

Supporting the transition to a low-carbon and climate-resilient economy is a key element of the SIX sustainability strategy. We do this by bringing relevant data products to market and by supporting our issuers in their climate-related disclosures. We are tackling our clients' ESG challenges through a dedicated and integrated product offering, delivering new regulatory data and content services.

A sound climate plan is the basis for any effective measure to mitigate global warming. We support the Paris Agreement and have committed to the Science Based Target Initiative (SBTi) at Group level in 2022. Last year, we began our iterative efforts to prepare for continuous emission reductions towards net zero.

With Instituto BME, we continue to make a strong commitment to financial literacy. By promoting financial education and literacy, we contribute to long-term economic stability and financial equity in society.

The success of the company depends on our qualified employees, who shape the financial markets of tomorrow. Maintaining a sustainable talent pipeline at all levels of the organization is a top priority. Our inclusive culture values diverse perspectives and encourages group-wide collaboration and lifelong learning. To reflect the continuous evolution in this area, we have updated the Group sustainability strategy by incorporating a separate area of action on our role as an employer.

Our newly established cross-divisional and international sustainability matrix organization, under the leadership of a dedicated Group sustainability team, has advanced each of our material sustainability matters during the past year. As we share this 2023 Report with you, we are already looking ahead to our next milestones.

Yours faithfully,

*Jos Dijsselhof*




**Jos Dijsselhof. Chairman of BME**

## Letter from the CEO (2-22)

Dear reader,

It is an honor to share certain reflections with you regarding sustainability and the way in which BME promotes such sustainability in a two-fold manner: as market infrastructure and as a company. In the following pages of this Report, you will be able to learn about and assess our commitment to the different stakeholders, as well as the successes achieved during the year, since the best way to move forward is to report and measure, and then to set demanding objectives to work on.

One of the milestones of 2023 was the entry into force of the new Securities Markets Law, in the preparation of which BME has actively participated through dialogue and collaboration with the different players involved.

To be a generator of financing for economies and well-being for its citizens, the Company has launched a new market segment for smaller companies, BME Scaleup, and has celebrated the tenth anniversary of the alternative fixed income market MARF. For its part, BME Growth has exceeded 7 billion in financing since the creation of the market in 2006, while continuing to promote other activities with responsibility and best practices throughout the entire value chain.

The year ended with 4.7 billion euros of funding channeled to companies in equities and another 422 billion euros in fixed income. The outstanding balance of ESG bonds amounted to 413 billion euros.

The genetics of BME includes the objective of becoming a sustainable finance center. In this regard, one of the most notable milestones of the year was the launch of a new family of indices whose main objective is to promote sustainability among issuers and investors. The new IBEX® ESG index comprises 47 companies with a degree of sustainability compliance for which an ESG data provider is used. Companies must comply with the United Nations Global Compact Principles, and certain exclusion criteria are taken into account for business activities critical to sustainability.

Part of the activity of BME revolves around its participation in the United Nations Sustainable Stock Exchanges initiative (SSE), of which it has been a member since 2015. This commitment is reflected in its involvement in different

working groups, support for the Sustainable Development Goals of the 2030 Agenda and the organization of symposiums such as Ring the Bell for Gender Equality held this year in Bilbao. The "Voluntary Guide on Sustainability for BME Issuers" was also updated, in line with SSE recommendations.

Additionally, as a business organization, BME has complied with the Code of Best Tax Practices since 2010 and has been a collaborating entity of the United Nations Global Compact since 2011.

During the year, BME signed an agreement with Greenomy through which it will offer its clients an advanced tool for sustainability reporting. Another notable project was the perception analysis of BME as a center for sustainable finance performed with the collaboration of a consultancy.

In 2023, the Company implemented the BME Internal Information System as a channel to report any irregularity or violation of internal regulations or current legislation. It has also made notable progress in establishing a new code of conduct for suppliers. In its policy to contribute to the decarbonization of the Planet, it has decided to eliminate the use of plastic bottles at events and internal meetings and has placed recycling containers in its work centers.

Since 2007, BME has provided its Stakeholders with an Annual Corporate Social Responsibility Report which, since 2018, has been known as the Consolidated Non-Financial Information Statement. This report, which was prepared using the international Global Reporting Initiative (GRI)\* standards and Law 11/2018 of 28 December as reference, aims to present the impact generated by the activities of the BME Group and its companies in the area of sustainability.

The contents of this Report have been prepared following a materiality analysis, according to which transparency, diversity and inclusion and contribution to society are the aspects with the greatest impact on the Company's ability to carry out its activities.

Faithfully,

*Javier Hernani*



**Javier Hernani. Chief Executive Officer of BME**

(\* Global Reporting Initiative (GRI) is a non-governmental organization whose objective is to promote sustainability reports to improve their quality, rigor and usefulness through the implementation of the triple bottom line: environmental, social and economic. For these purposes, GRI publishes a methodology to prepare sustainability reports, the current version of which is the GRI Standards, which allows companies to increase transparency in terms of sustainability, as well as comparability between reports.

# 1. General Information on BME

(2-1, 2-6, 2-23, 2-24)

Bolsas y Mercados Españoles (hereinafter, BME), a SIX Group company (hereinafter, SIX), is the operator of all the securities markets and financial systems in Spain. Since their inception, both BME and SIX have been a benchmark in the sector in terms of solvency, efficiency and profitability.

BME offers a wide range of products, services and trading systems based on stable and advanced technology developed in-house. Likewise, it offers access to global

markets to issuers, intermediaries and investors both in Spain and abroad.

One of the company's strengths is based on its diversification, which is reflected in its organization around three business areas that offer a wide variety of services at the highest level. These areas are as follows: Exchanges (Equity, Fixed Income, Derivatives and Market Data), Securities Services (Clearing and Settlement) and Financial Information.

## Main Strengths of BME

 <p>Solid and highly-profitable business model</p>	 <p>Long-lasting and firm relationships with major clients</p>	 <p>State-of-the-art, efficient and reliable technology</p>	 <p>Highly-qualified staff</p>	 <p>Solid and trusted brand</p>
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Likewise, 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.



**The mission of BME is to be the benchmark for financial markets and systems in Spain**, always seeking excellence in service quality and innovation in markets and services, granting value to society and the market.

The main objective of BME is to place the client at the center of all corporate decisions and maximize the relationship with them so that, at today's date, excellence and the provision of the best service are the differentiating elements and the most recognizable hallmark of the identity of BME.

Likewise, BME promotes the significant increase in its revenues through organic and inorganic growth, the increase in geographical diversification and services, the strengthening of the business model of BME, adapting it to the new environment, and customer equity.



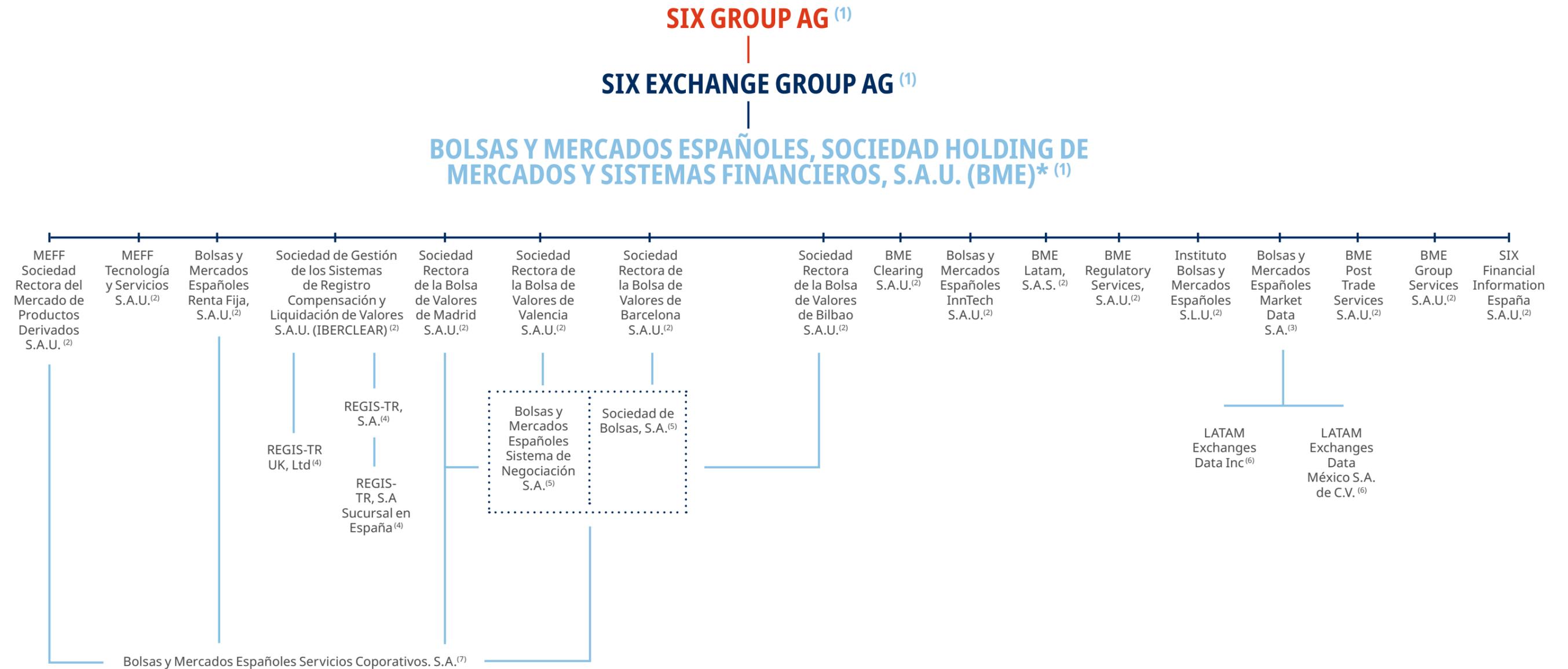
**BME is a benchmark in the sector in terms of solvency, efficiency and profitability.** BME is also a recognized company in terms of impartiality, transparency and protection, a dynamic and modern company that is committed to customer service, innovation and development, using its own technology that has been exported to various countries.

## Main Figures of BME in 2023 <sup>(2-6)</sup>

<b>497.1 million euros (+4% vs 2022)</b> Economic valuation of the Company	<b>246.5 million euros (-16% vs 2022)</b> Economic value distributed to stakeholders	<b>-98% vs 2022</b> Reduction of Scope 2 emissions as a result of the purchase of renewable energy
<b>1.7 million euros (+35% vs 2022)</b> Investments related to sustainability <sup>(1)</sup>	<b>942 employees (+3% vs 2022)</b> Total workforce	<b>38% (+1 p.p. vs 2022)</b> of senior management and middle management are female

<sup>(1)</sup> Includes BME's investment in training and financial culture, patronage and cultural promotion.

## Corporate Structure of the BME Group and Holdings in Other Companies Geographical Area of Action (2-1, 2-2, 2-6)



(\*) In 2023, Openfinance left BME group and SIX Financial Information Spain was acquired. Given the number of employees at these companies compared with total group employees, these operations have not had a relevant impact on the indicators listed in this report.

(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 Regulatory Services, S.A.U., Instituto Bolsas y Mercados Españoles, S.L.U. and BME Post Trade 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., Sociedad Rectora de la Bolsa de Valores de Barcelona, S.A.U. and Sociedad de Bolsas, S.A., respectively, hold a participation of 49.71 per 100, 7.77 per 100, 0.14 per 100, 10.09 per 100, 9.93 per 100, 9.93 per 100, 9.93 per 100 and 2.5 per 100 of the share capital of Bolsas y Mercados Españoles Market Data, S.A.

(4) IBERCLEAR holds a 100% stake in the share capital of REGIS-TR UK Ltd and REGIS-TR Société Anonyme, the latter of which set up 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 stake 25 percent in the companies Bolsas y Mercados Españoles Sistemas de Negociación, SA and Sociedad de Bolsas, SA

(6) Bolsas y Mercados Españoles Market Data, S.A. holds a stake equal to 51 percent and 49 percent in the capital stock of LATAM Exchanges Data Inc. and LATAM Exchanges Data México S.A. de C.V., respectively.

(7) 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. hold, respectively, a stake in the 11 per 100, 9 per 100, 21 per 100, 48 per 100 and 11 per 100 of the company Bolsas y Mercados Españoles Servicios Corporativos, S.A.

## Holdings in Governing Companies of Latin American Financial Markets, the Energy Market and Others in the Financial Sector at December 31, 2022

<b>7.80%</b>	<b>0.99%</b>	<b>5.65%</b>	<b>5%</b>	<b>11.27%</b>
Cámara de Riesgo Central de Contraparte de Colombia, S.A. through BME	Bolsa Mexicana de Valores, S.A. de Capital Variable through BME.	Operator of 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, operator of all securities markets and financial systems in Spain, mainly carries out its activity in this country, in the European Union, in Switzerland and in Latin America, in Colombia, Mexico, Chile, Panama and Costa Rica. The registered and operational headquarters of BME and of all Group companies (with the exception of REGIS-TR, S.A., REGIS-TR UK, Ltd, BME Latam S.A.S., LATAM Exchanges Data Inc -hereinafter LED- and LATAM Exchanges Data México S.A.

of C.V. -hereinafter LED México-) are located in Spain, with the headquarters of BME in Madrid, at Plaza de la Lealtad 1, and the organization's main operational headquarters in Las Rozas (Madrid), at Calle Tramontana 2bis. The corporate operations carried out during the financial year 2023 have not led to changes in the registered office or in the operational headquarters of BME (2-1).

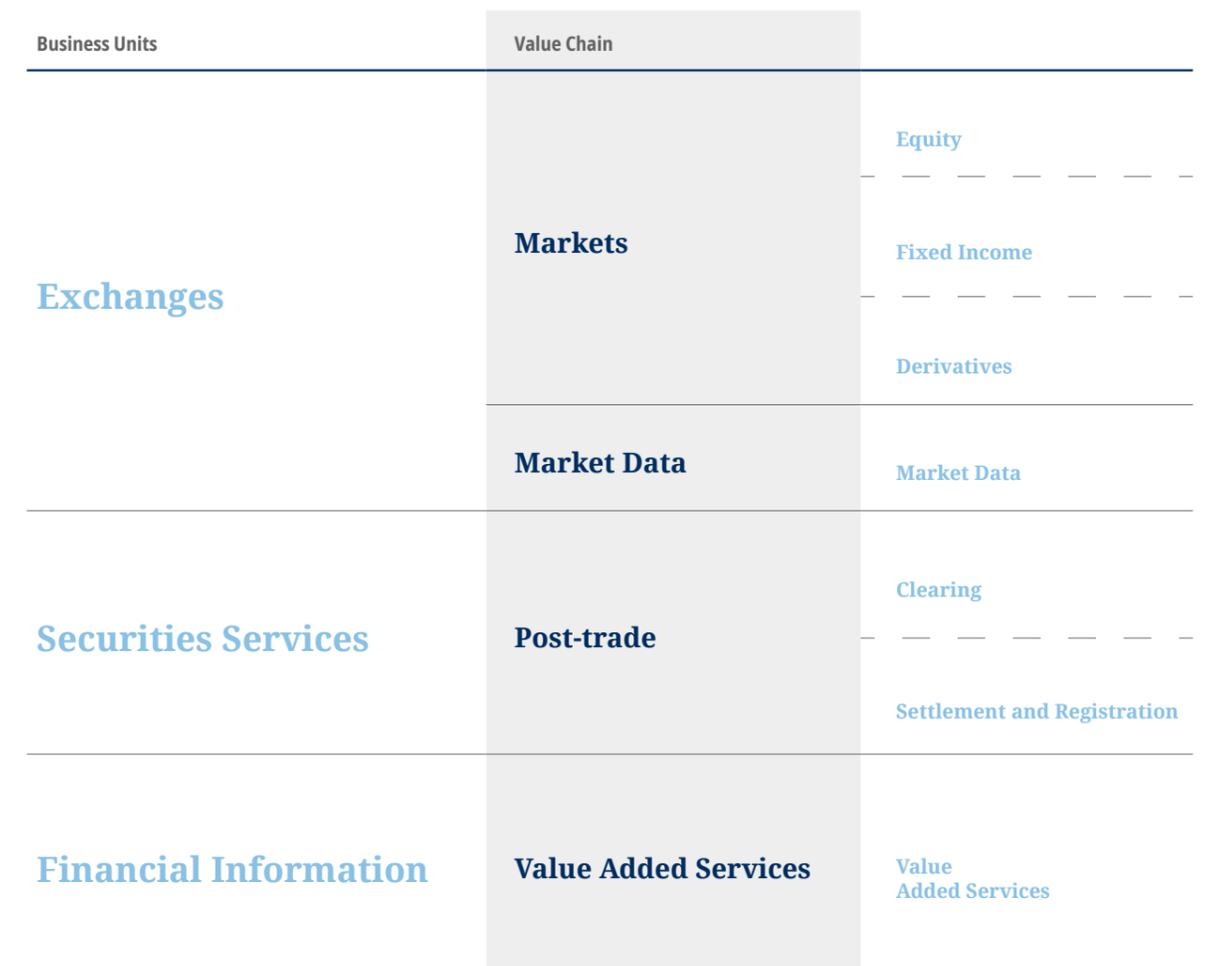
## Business Model

The SIX business model is organized through four units that are described below: Exchanges, Securities Services, Financial Information and Banking Services.

Business unit	Description
<b>Exchanges</b>	SIX connects market participants in Switzerland, Spain and around the world through its activities grouped in exchanges. It operates the Zurich and Spanish stock exchanges and the SIX Digital Exchange (SDX), the world's first fully regulated digital exchange.
<b>Securities Services</b>	SIX covers the entire post-trade process, from clearing, registration to custody, as well as securities financing, tax reporting, fund services and payment transactions. Through this business unit, SIX covers these activities in the Swiss and Spanish stock markets, and also plays an important role globally. In Switzerland, electronic transactions in national and international markets are fully automated through its subsidiary SECOM.
<b>Financial information</b>	The Financial Information business unit provides an extensive catalog of global data and index services to clients around the world through data feeds, APIs, custom data packages and multi-cloud and third-party platforms.
<b>Banking Services</b>	As a payment transactions center in Switzerland, SIX provides banks with innovative services in an increasingly digital world.

Each of these units, with the exception of Banking Services, have their scope of action at BME, as shown in the following diagram, which schematically reflects the structure of the business model of BME, based on the business units of SIX described above. In addition to the business units, BME, through the BME Institute, attaches special importance to

training activity since it makes it easier for end users and clients to have the necessary and sufficient knowledge at their disposal to attain their objectives with the greatest guarantees, transparency and security contributing, in turn, to strengthening the Group's activity.



To guarantee success in the deployment of this business model, BME needs to rely on a series of pillars such as its teams, its capacity for innovation and technological development or its operational integrity, always trying to maximize its contribution to society and environmental protection.

Likewise, **this business model allows BME to be an important part of the engine of the Spanish economy** to which it contributes, among others, through investments, the payment of taxes or the generation of quality employment. In this regard, in 2023, the company generated more than 300 million euros (-13% vs 2022), of which it has distributed over 246 million euros (-15% vs 2022), 82%, among its stakeholders.

## Economic Value Generated, Distributed and Retained <sup>(1)</sup> (201-1)

(thousands of euros)

	2022	2023
<b>Economic Value Generated</b>	<b>347,858</b>	<b>300,496</b>
Revenue	288,006	279,654
Other net gains and losses <sup>(2)</sup>	59,852	20,842
<b>Distributed Economic Value</b>	<b>293,129</b>	<b>246,530</b>
Operating costs	44,324	57,874
Personal expenses	80,597	89,545
Dividends	122,078	60,203
Income tax and other taxes <sup>(3)</sup>	45,353	38,288
Associations, donations and other investments to the community	777	620
<b>Retained Economic Value (undistributed profit)</b>	<b>55,506</b>	<b>53,966</b>
Reserves	41,920	15,847
Amortization and depreciation	13,586	38,119

(1) The revenue balance for 2022 and 2023 includes revenue after deducting the "direct variable costs of operations", whose inclusion in the consolidated income statement after the income headings as a reduction thereof was imposed by CNMV Circular 5/2016 of July 27, on accounting standards, statements of reserved and public information and financial statements.

(2) Includes the work carried out by the company for its assets, other operating income, the result of entities accounted for using the equity method and the financial profit/(loss) less the result attributed to minority interests.

(3) Exclusively includes the expense for Income Tax and other taxes recognized in the year.

## Contribution to the Stability of the Economy

Financial markets have played a significant role in society since their origin, since their critical purpose lies in channeling financing to companies and Public Administrations, therefore promoting global economic development and the well-being of its citizens and society as a whole. In this context, a stable economy is crucial to instill confidence in the markets, boost economic growth and preserve employment, thus generating a more predictable economic environment with less volatility.

As a key player in the management of the core infrastructure of financial markets and financial systems in Spain, BME plays a key role in contributing to the security, stability and innovation capacity of the national economy. Its solid experience allows it to manage the Spanish financial market in a safe, regulated and competitive manner, guaranteeing an efficient technological infrastructure free

from interruptions. In this regard, innovation, digitalization and cybersecurity have become essential pillars of the operations of BME

Likewise, BME contributes to Spain's economic stability through its commitment to financial education, providing knowledge to the sector and society in general so that they can take responsible decisions, fully understanding the risks, consequences and impact of their decisions.

Lastly, the contribution of BME to economic stability is reinforced by its active participation in significant organizations that promote the sustainable development of the Spanish financial center. This translates into a continued commitment to practices and policies that support sustainable and responsible economic growth.

## Support for SMEs and Startups

The contribution of BME to financial markets and systems is not limited to providing stability and security, but also growth and development, both in fixed income and equity, of the Spanish medium and small companies, which constitutes more than 90% of the country's productive fabric.

In the equity area, BME has initiatives such as the Pre-Market Environment (EpM), BME Scaleup and BME Growth. The EpM is an exclusive training and networking program formed by 25 companies to enable expanding SMEs to learn about the functioning of capital markets and access private institutional investors.

For its part, BME Scaleup is the first rung in financing through the securities markets operated by BME. This market is primarily aimed at companies in an early development phase with a proven and scalable business model from any sector. BME Scaleup is a market created in 2023 to offer a financing alternative to smaller companies. This market is primarily aimed at companies in an early development phase with a proven and scalable business model from any sector. With this commitment, which completes the financing ladder, BME positions itself as a benchmark for the segment of companies in the embryonic growth phase and so-called start-ups. It should be noted that, in 2023, BME sponsored the Startup OLÉ event on innovation and entrepreneurship in which more than 230 startups and 2,500 people participated.

Lastly, BME Growth is a market aimed at small capitalization companies seeking to expand, with tailored regulation, designed specifically for them, with costs and processes adapted to their characteristics, and which is fully consolidated as a recurring financing vehicle for small and medium companies. Since BME Growth was founded 17 years ago, 160 small and medium-sized enterprises have debuted in this market. Although access to the market is independent of the geographical area of origin and the specific sector, companies with a strong research, development and innovation component stand out in this market. BME Growth has fostered the expansion of organizations dedicated to information technology, biotechnology and healthcare, telecommunications and renewable energy. Since 2006, it has enabled over 7,000 million companies admitted to trading to gain funding.



In the field of fixed income, BME created the Alternative Fixed Income Market (MARF) in 2013, which allows the financing of companies of any size, through a wide range of financing formulas, such as promissory note programs, issuance of bonds, green bonds, project bonds, etc. This market

presents advantages to both companies (greater financing capacity, visibility and prestige, internationalization, etc.) and investors (portfolio diversification, access to new corporate issuers, profitability through new products, etc.).

## 10th Anniversary of the Fixed Income Alternative Market (MARF)

The fixed income market of BME celebrates its first decade with 143 issuers and an outstanding balance, total financing contributed to the real economy at this time, close to 8,000 million

Set up in 2013, the MARF has grown steadily, both in terms of the number of companies and the amount financed through the market thanks to the funding possibilities offered by it, from promissory note programs to obtain short-term financing to bond issues in the medium and long term, through project bonds for infrastructure funding or securitization. In addition, ESG securities have begun to be issued in the market in recent years: sustainable bonds, linked to sustainability, social or green emissions.

Another of the MARF's milestones in its first ten years of history was its leading role in public-private collaboration such as, for example, its response to the coronavirus crisis, when ICO collateral facilities amounting to 4 billion euros were deployed through this market. This organization also actively participates as an investor in the primary market, facilitating the financing of companies. The support of institutions such as CESCE or COFIDES has also been relevant in issues that have been launched in the market.

In terms of international recognition, since 2020, the MARF has been included in the list of eligible markets by the ECB, allowing the central bank to purchase debt registered in this market from BME in its stimulus programs, and in 2022, it obtained Recognized Overseas Investment Exchange (ROIE) status from the British FCA for the provision of its services in the United Kingdom.

-  **148** companies have obtained financing in the MARF...
-  ...of which **14** are international
-  **€70,000M** channeled in 10 years
-  **€8,000M** of total debt admitted to trading

In 2023, BME held its 19th edition of the Medcap Forum, which concluded with more than 1,100 meetings between investors and small and medium-cap companies, 30% more than in the last edition, which has allowed us to better understand this part of the market. For the first time, the Medcap Forum measured its carbon impact with different initiatives, including most notably, the measurement of the footprint through a survey to find out what means of transportation attendees used. After monitoring the emission sources, potential saving measures have been

identified to achieve carbon neutrality in the following editions. The objective of this initiative, which has been implemented in collaboration with Mediatree, is for the Forum to become a Carbon Neutral Event.

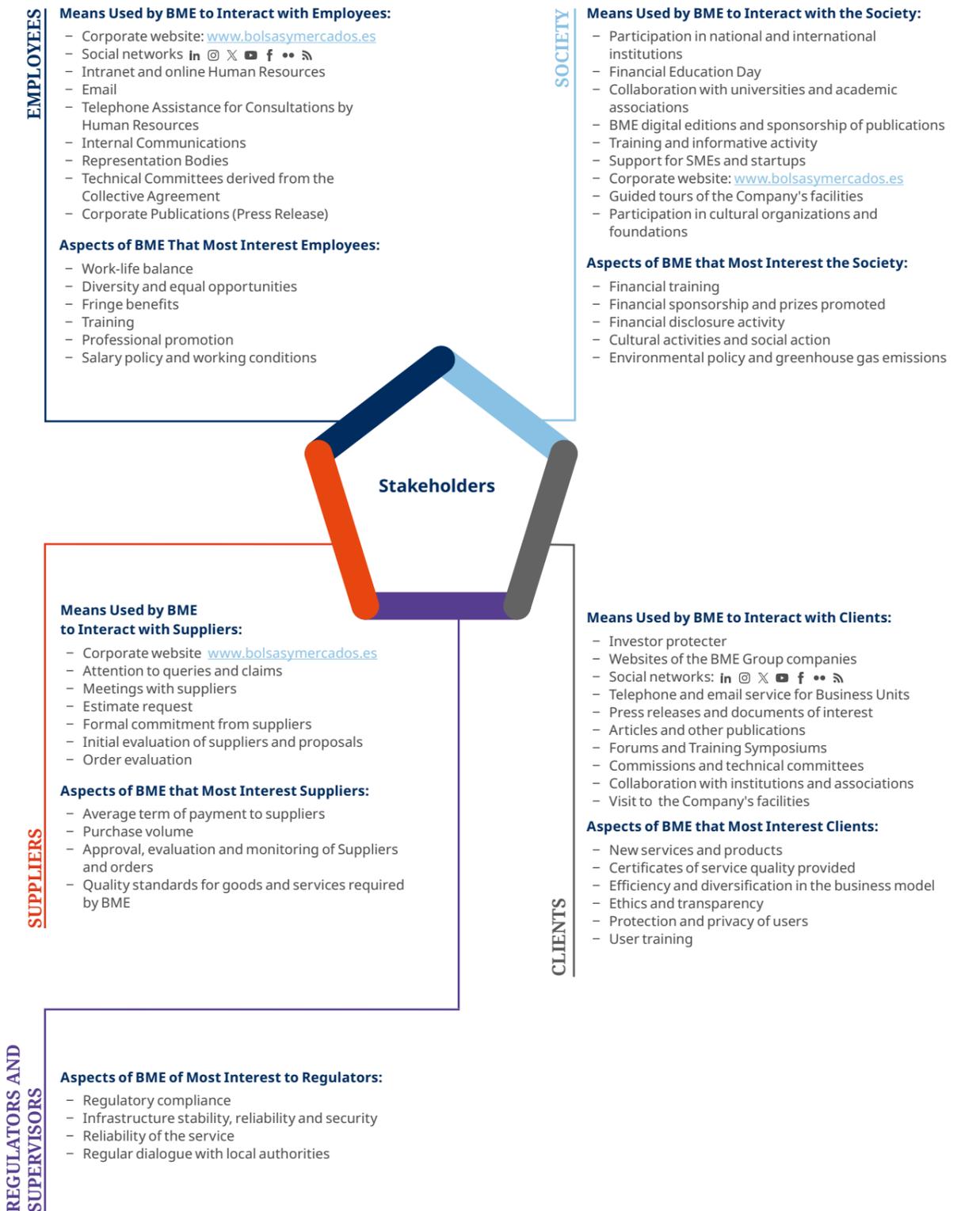
Additionally, BME has participated for yet another year, together with the Spanish Confederation of Small and Medium-sized Enterprises, in the CEPYME 500 project, aimed at boosting growth and promoting the downsizing of the 500 SMEs that lead business growth in Spain.

## BME Stakeholders (2-16, 2-29)

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

In 2023, BME and SIX performed a joint reflection exercise to update their map of interest groups, resulting in regulators and supervisors being considered a relevant group for the company.

To consolidate a constructive relationship with the aforementioned stakeholders, BME maintains the communication channels that allow the Company to respond to their expectations. BME bases the frequency of its relationship with its main stakeholders on its business's needs. Likewise, BME maintains a specialized website on sustainability and non-financial information on the Company and its Group on its corporate website.



The Board of Directors, through the approval of this report, includes those significant issues that have arisen in the relationship and communication of the Company with its stakeholders and the departments involved in its relationship with them. In particular, this Consolidated Non-

financial Information Statement has been prepared based on the analysis previously carried out, in which the most significant aspects for the Company and its stakeholders were identified, addressing, among others, economic, social and environmental issues.

## Value Generated by BME for its Stakeholders



**Employees**

It promotes the professional and personal development of its employees through the ongoing improvement of the services and activities provided to them, its training programs and professional development.



**Society**

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



**Clients**

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



**Suppliers**

It generates business among its suppliers, in general, based locally.



**Regulators and Supervisors**

Ensures compliance with regulations, provides the infrastructure for the correct functioning of the market, collaborates in the generation of new regulations and ensures the transparency of financial markets by providing accurate information on transactions, asset prices and trading volumes.

## National and International Initiatives in Which BME Participates (2-28)

### Sustainable Stock Exchanges (SSE) of the United Nations

Partner Exchange since 2015. This initiative aims to improve performance in ESG matters and to promote sustainable investments, favoring collaboration between competent international investors, companies, regulators and organizations in this field. In this regard, it positions itself as a global platform that aims to offer the necessary tools to maximize the role of responsible investment in sustainable development.

Pursuant to the aforementioned commitment, BME promotes, among issuers of securities and new companies listed on the markets and systems managed by BME, the importance of reporting environmental, social and corporate governance non-financial information, and of issuing sustainability bonds.

### United Nations Global Compact

Complied with since 2011. This initiative aims to promote business sustainability through the implementation of 10 Universal Principles of conduct and action in matters of Human Rights and Business, labor standards, the environment and the fight against corruption, in the strategy and daily operations of all types of entities and thus to promote the attainment of the Sustainable Development Goals.

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

### Code of Best Tax Practices (CGTP)

Complied with since 2010. The purpose of this Code is to promote a cooperative relationship between the Tax Agency and the BME Group companies that comply with 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 individually comply with the CGTP.

## 1.1 Sustainability Strategy (2-22)

SIX plays a central role as an infrastructure for financial markets and as a solutions provider. Their position in the interface between financial markets and companies means they can help shape the transition toward a sustainable economy.

To face all the sustainability challenges awaiting the Group, in 2021, SIX implemented a sustainability strategy that would define the roadmap to follow to address these environmental and social challenges. Like any strategic Group matter, the Board of Directors of SIX is the governing body responsible for monitoring the implementation of the sustainability strategy and decision-making.

For its part, the Executive Board is responsible for implementing the sustainability strategy in each business unit and, to this end, it meets at least quarterly to assess the strategy's implementation status. Moreover, in 2023, its own organizational structure was designed to promote and supervise actions linked to sustainability with transversal representation also at BME.

The sustainability strategy of SIX is organized around four pillars<sup>(1)</sup>:

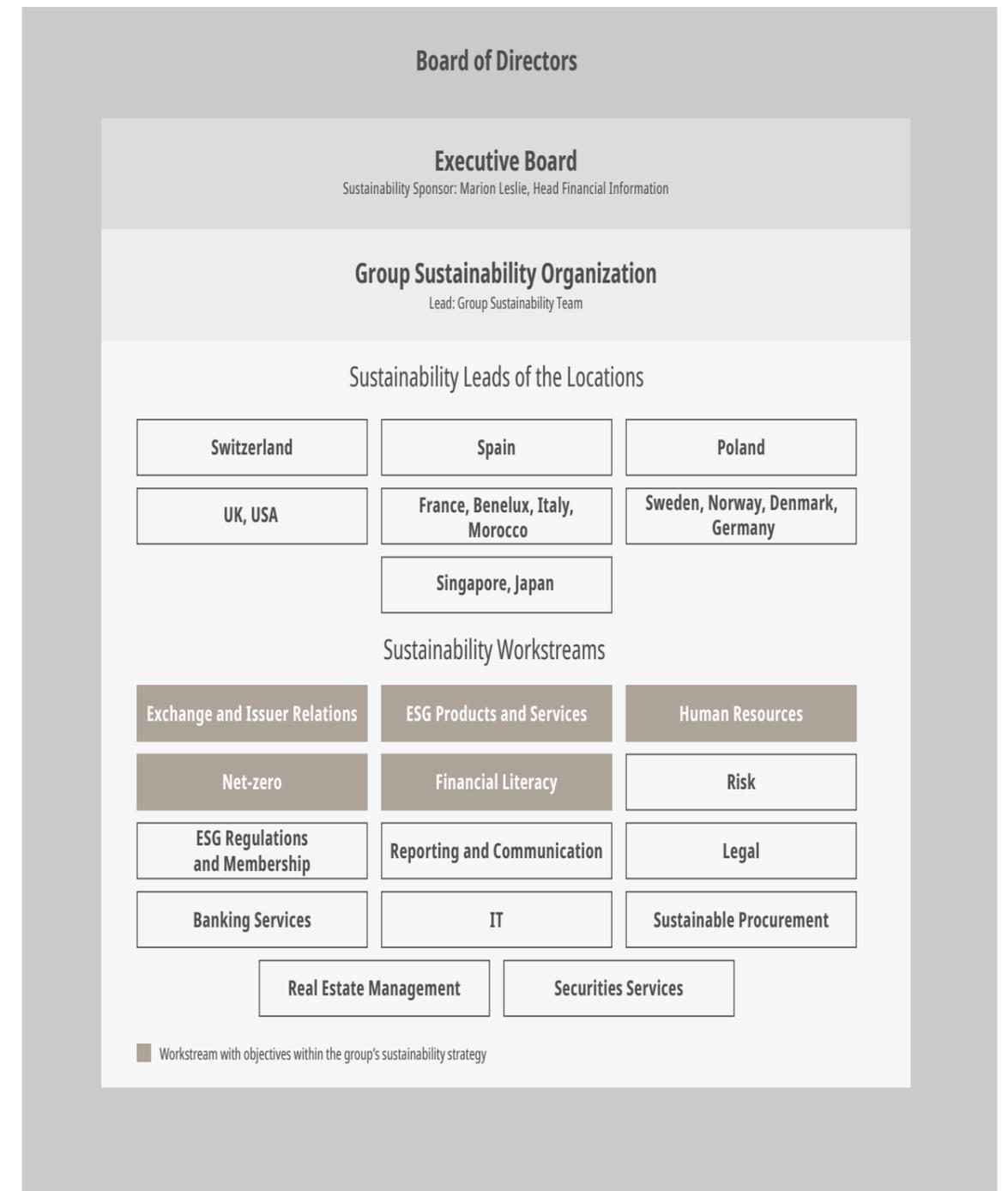
- SIX as a financial market infrastructure provider.
- SIX as an ESG products and services provider.
- SIX as a good corporate citizen.
- SIX as an attractive employer.

For each of these pillars, a series of goals have been defined that aim to attain the global objective of accelerating the change toward a more sustainable future. At SIX, the sustainability strategy is overseen by different supervisors, who are responsible for its approval, implementation and monitoring.

(1) The fourth pillar was added at the end of the year and will begin to properly gain traction as of 2024.

# Sustainability Strategy

**SIX plays a central role as a financial market infrastructure and as a solutions provider. Our position at the interface between financial markets and business enables us to help shape the transition to a sustainable economy**



## 1.2 The contribution of BME to Sustainable Finance

The social function of financial markets is vital from their origin, since they are designed to facilitate the flow of resources towards business growth and, therefore, toward general economic progress, generating benefits for society. In nations in which companies diversify their financing sources through capital markets, more solid and resilient economies are observed.

In recent times, sustainable finance has experienced a notable boom, driven by the UN Sustainable Development Goals and the 2030 Agenda. These goals require an annual investment of 6 trillion dollars and the active collaboration of the private sector to carry them through. The growing interest of investors in sustainability and the increasing commitment of listed companies to this cause are essential pillars in the current boom in sustainable finance.

The profound sustainability commitment of BME is genetically rooted. This commitment materializes on two fronts: as a company in itself and as an administrator of the financial markets.

As a company, BME meets the most rigorous sustainability standards. It promotes sustainability events, encourages financial education and is part of global initiatives such as the Global Compact and Sustainable Stock Markets.

In its role as financial markets manager, BME stands strong as the conducive environment for the development of sustainable finance in all its manifestations. This ranges from investing with socially responsible criteria in shares, through its FTSE4Good IBEX, IBEX® Gender Equality and IBEX® ESG indexes, to the promotion of bonds that follow sustainability criteria.

Thus, **BME views sustainable finance as a strategic growth opportunity that will maximize the positive social and environmental impacts derived from the financial sector**, maintaining the same levels of reliability, quality and transparency that characterize the activities of BME.

For this reason, **BME has continued to work for fourteen years to develop ESG indices in the equity markets and offer the possibility of issuing green, social and sustainable bonds through fixed income markets.**

In order to increase its contribution to sustainable finance, BME has worked together with SSE throughout the year in different areas:

- In 2023, BME, in collaboration with SSE, published the **BME Voluntary Guide on Sustainability Reporting for Listed Companies**. This Guide contains ten recommendations to promote sustainability at the Company to help firms reflect on their practices and find ways to improve them further, regardless of their level of maturity.
- During the year, the UN, SSE, IFC (International Finance Corporation) and CDP (Carbon Disclosure Project) provided a **free CDP-certified course in coordination with BME to offer capital markets high-quality training on climate disclosure and provide an overview of the TCFD (Taskforce on Climate-related Financial Disclosures) recommendations**. Thanks to this course, participants were able to learn what climate-related reporting is and why it is important, the global and regional context, and initial steps on how to address the TCFD recommendations.

For its part, the BME Institute launched the first edition of the **Sustainable Financing Course** in collaboration with OFISO in 2023. The objective of this program is to provide the necessary knowledge so that companies can understand the instruments and formulas of sustainable financing, the operations of that specific market, its regulation and its risks. It should be noted that, given the success of the course, at the date of this report, the second edition had already been launched.

During the year, a **perception diagnosis** was carried out with the collaboration of the consulting firm Transcendent to identify the image of BME as a center for sustainable finance, which has allowed the Company to identify areas of improvement to address in the coming months.

Moreover, in December, BME reached an agreement with the financial data provider Greenomy to **implement a sustainability reporting tool for companies** that will come into operation in the first quarter of 2024.

### Integration of ESG Criteria in Equity

In the equity area, BME promotes sustainable finance through ESG indices. In this regard, the Company has the IBEX Gender Equality® and the FTSE4Good IBEX indices® and the IBEX ESG® family of Indices®.

In 2023 **BME launched the IBEX® ESG Indices family**, comprising 47 Spanish listed companies. To be eligible, companies must obtain an ESG rating from an independent provider equal to or higher than C+, comply with the United Nations Global Compact Principles, and meet certain exclusion criteria related to business activities critical to sustainability. This new family of indices encourages issuers to commit to sustainability, and heightens transparency for investors who wish to invest in companies that perform well in terms of sustainability.

The IBEX® Gender Equality index was launched in November 2021 to promote gender equality among listed companies. This indicator is updated annually based on the information published by the CNMV, and to enter the index, companies must have a female presence of between 25% and 75% on their Board of Directors and of between 15% and 85% in senior management. The number of women has risen in June 2023 from the initial 30 to 53 corresponding to the last revision.

## Integration of ESG Criteria in Fixed Income

ESG bonds, whether green, social or sustainable, are an instrument that BME makes available to private and public sector entities to seek financing through the issuance of debt to obtain liquidity. These types of bonds are used to finance projects that seek to generate a positive impact on society or the environment.

For BME, the issuance of ESG bonds means giving companies the opportunity to close the circle of their sustainability strategies by obtaining sustainable financing to achieve their environmental and social objectives. In this context, throughout 2023, the MARF has admitted green and sustainable promissory note and bond programs worth nearly 700 million euros to trading.

The impact of sustainable financing in Spain is reflected in the latest OFISO (Spanish Observatory for Sustainable Financing) annual report on sustainable finance. According to this report, sustainable financing in Spain reached the record figure of 60,134 million euros in 2022, up 9% on the previous year. Likewise, the report establishes that, thanks

to the green bonds issued in 2022, the emission of over 7 million tons of CO<sub>2</sub> was avoided in Spain, which is equivalent to emissions of CO<sub>2</sub> generated by 1.5 million passenger vehicles during one year.

As a significant milestone in terms of sustainable financing, it is worth mentioning that in 2023 the European Union approved the first European green bond standard (EUGBs), which seeks to promote transparency, low-carbon investments, reduce the greenwashing risk and demonstrate that the financing of green projects is aligned with the EU Taxonomy. Thanks to all this, investors will be able to evaluate their investments more easily to ensure that they are truly sustainable.

In line with the ESG strategy of SIX, BME has acquired the commitment to **continue developing products and services that condition economic growth toward a more sustainable development.**

## Innovation as a Lever of Growth (3-3)

Constant technological changes drive BME to develop new products and services that respond to the new demands of investors and issuers, create a reliable, safe, efficient and transparent operating environment and improve accessibility to financial markets.

In this context, BME has developed a Blockchain laboratory, DLT-Lab, from which it analyzes and promotes initiatives and projects in blockchain technology throughout the entire value chain of the markets, collaborating with supervisors and financial institutions to ensure the value of solutions and new business models. In this area, it is worth highlighting the issuance in 2022 of a bond listed in a regulated market and registered in blockchain technology,

or the development of a Voluntary Register for carbon and biodiversity inventories that allows companies to offset their carbon footprint.

Additionally, BME is part of the Alastria consortium, a non-profit association that promotes the digital economy through the development of decentralized registry technologies (blockchain).

Lastly, in 2023, as part of its sustainability strategy, BME revalidated its commitment to promoting financial education and innovation through the organization of events such as Hack&Disrupt!, an innovative event to work as a team with real corporate challenges focused on innovation and sustainable finance.

# 2. Environmental Protection Commitment

(3-3)

BME considers environmental sustainability to be a long-term strategic opportunity that influences the development of the Company and the financial markets through the promotion of sustainable financing. The latter stands out in the issuance of green, social and sustainable bonds, which play a vital role in the transition toward a greener and more sustainable economy.

The office activity of BME and the location of its headquarters in urban areas do not generate a significant direct environmental impact, which is why aspects related to waste management, materials, biodiversity, water consumption, food waste located nearby to its facilities have not been considered priorities, nor has it focused on possible noise and light pollution or emissions of substances harmful to the ozone layer, nitrogen oxides, sulfur oxides and other emissions.

With respect to environmental risks, BME has evaluated these aspects within its risk management and has determined that, to date, the risks derived from its activities are not considered to be significant. Therefore, it has not incurred significant expenses, assets, provisions or contingencies of an environmental nature that could significantly impact its finances or assets, nor has it established specific environmental evaluation or certification procedures. In this context, given the reduced environmental impact of its activity, BME does not have an

Environmental Management System, but instead applies the precautionary principle defined by GRIs, always trying to perform its functions through efficient environmental management (3-3). As a result, and in line with previous years, in either 2023 or 2022, BME did not receive any fine or significant firm sanction for non-compliance with regulations related to environmental aspects (2, 27).

At the request of the Swiss National Bank, SIX has clarified the possible impact of physical climate risks on operations. This analysis focused on climate-related natural hazards, and in particular, extreme weather events such as flooding and water shortages. Structural measures were implemented based on the analysis. The risks have been integrated into the SIX risk management tool and are managed, monitored and reviewed as part of the standard risk management process. For its part, BME has already begun working along these lines to conduct a similar analysis of climate risks in the medium term to understand how these could affect its operations.

Materializing its commitment to responsible environmental management, although no environmental goals have been formalized, throughout 2023, BME launched various initiatives to reduce its energy consumption and GHG emissions both proactively and within the framework of the sustainability strategy of SIX (302-5).

- Commitment to achieve Net Zero in its activities to 2050 at the latest.
- Acquisition of electricity from renewable sources in all offices with direct management.
- Replacement of primary air conditioners with other high-efficiency ones that improve environmental quality at the offices.
- Installation of charging points for electric vehicles.
- Launch of the project for a self-consumption photovoltaic installation in Las Rozas of around 350 kWp that will enable the reduction of 2,991 tons of CO2 within twenty years.

Additionally, in 2023, plastic bottles were eliminated from the offices of BME and recycling bins were placed at all work centers, while initiatives implemented in previous years have been maintained, such as the fostering of teleworking and tele-face-to-face meetings, the promotion of public

transportation and the use of shuttles for employees or the installation of electric chargers for cars, LED lights and more efficient equipment with Energy Star energy efficiency guarantees (302-5).

## 2.1 Climate Change Performance

BME, in its commitment to the environment and sustainability, carries out actions both internally, aimed at achieving lower energy consumption at its facilities and

minimizing the environmental impacts of the services managed at the Group's work centers, and externally, through environmental support initiatives.

### BME Environmental Performance at a Glance



**Avoided emissions: 1,125.18 tCO2**  
(corresponding to Scope 2)



**Renewable energy consumption: 33,201.93 GJ**



**Reduction in Scope 2 emissions vs 2022: 98%**

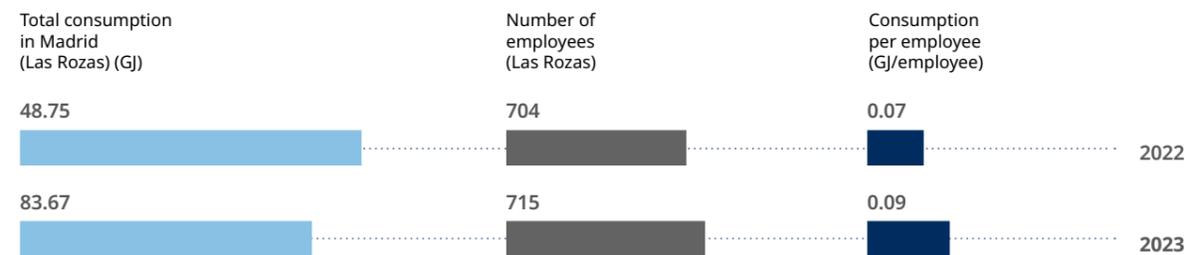
### Electricity Consumption Indicators by Geographic Areas in Spain <sup>(1)</sup> (302-1, 302-3, 302-4, 305-5)

<b>Madrid (Las Rozas and Lealtad)</b>	<b>2022</b>	<b>2023</b>
Variations in total consumption (GJ)	33,125.34	30,332.37
Number of employees in Madrid	754	827
Consumption per employee (GJ/employee)	43.93	36.67
<b>Barcelona<sup>(2)</sup></b>		
Variations in total consumption (GJ)	2,142.76 <sup>(2)</sup>	1,751.48 <sup>(2)</sup>
Number of employees in Barcelona	74	76
Consumption per employee (GJ/employee)	28.95 <sup>(2)</sup>	23.04
<b>Bilbao</b>		
Variations in total consumption (GJ)	1,306.56	1,118.11
Number of employees in Bilbao	25	21
Consumption per employee (GJ/employee)	52.26	53.24
<b>Valencia</b>		
Variations in total consumption (GJ)	244.78	146.36
Number of employees in Valencia	53	13
Consumption per employee (GJ/employee)	4.62	11.25
<b>Total Spain</b>	<b>2022</b>	<b>2023</b>
Variations in total consumption (GJ)	36,629.63	33,348.33
Number of employees	906	942
Consumption per employee (GJ/employee)	40.43	35.40

<sup>(1)</sup> The number of employees includes data from the BME Group's workforce (except BME Latam SAS, LATAM Exchanges Data Mexico S.A. de C.V. and LATAM Exchanges Data Inc).

<sup>(2)</sup> Energy consumption at the Barcelona headquarters in 2023 and the consumption per employee for this period includes the electricity consumption data for the second half of 2022, as updated data is not available at the date of preparation of this report.

## Gas Consumption Indicators in Spain <sup>(1)</sup> (302-1, 302-3)



(1) The number of employees in Las Rozas (Madrid) includes data on the BME Group workforce (except BME Latam SAS, LATAM Exchanges Data Mexico S.A. de CV and LATAM Exchanges Data Inc).

As a result of this energy consumption, BME generates a series of GHG emissions that are currently monitored through the calculation of the Company's carbon footprint. It should be noted that, in line with the Group's decarbonization strategy, efforts continued throughout 2023 to discover the emission sources of BME. As a result of this work, it has been possible to calculate the Company's

carbon footprint in greater detail and include more Scope 1 and 3 categories in this report.

## Greenhouse Gas Emissions in Spain

(305-1, 305-2, 305-3)

	2022	2023
<b>Scope 1 emissions (tons of CO2) <sup>(6)</sup></b>	<b>61.8</b>	<b>1,585.76</b>
Natural gas consumption	2.22	4.23
Diesel consumption <sup>(4)</sup>	44.43	45.52
Refrigerant gas consumption	NA	1,511.30
Employee transportation <sup>(1)</sup>	15.15	24.71
<b>Scope 2 emissions (tons of CO2)</b>	<b>375.92</b>	<b>7.31</b>
Electrical consumption <sup>(2)</sup>	375.92	7.31
<b>Scope 3 emissions (tons of CO2)</b>	<b>1,436.09</b>	<b>1,439.30</b>
Category 3.3: Fuel and energy-related activities <sup>(3)</sup>	477.91	436.65
Category 3.6: Business trips	431.86	459.01
Category 3.7: Displacement of employees to the workplace	526.32 <sup>(5)</sup>	543.64
<b>Emission intensity per employee (tons of CO2/employee)</b>	<b>-</b>	<b>-</b>

<sup>(1)</sup> In 2023, this includes the corporate bus and a company car. In 2022, it only includes emissions associated with the corporate bus as there was no access to data for the company car.

<sup>(2)</sup> Scope 2 emissions calculated using the market-based method. The significant drop in these emissions is associated with the purchase of renewable energy in all offices where BME has operational control.

<sup>(3)</sup> Includes upstream emissions related to gas, diesel and electricity consumption. Emission factors: Defra, 2023.

<sup>(4)</sup> Data calculated on refueling, not consumption.

<sup>(5)</sup> Data recalculated due to the development of a more precise method.

<sup>(6)</sup> Emission factors used: Miteco, 2023 for natural gas; Defra, 2023 for diesel and employee transportation; and IPCC, 2023 for refrigerant gases.

## National Registry of Emission Rights (RENADE)

RENADE is a service that BME, through Iberclear, has provided to the Spanish Office for Climate Change (OECC) since 2005. Although in the beginning, it was a service awarded for the upkeep of the Registry directly by the OECC for Iberclear, from 2013 onwards, the Company has participated in the public open tender that is currently carried out every five years to provide this service, winning each tender to date, and becoming the only provider of this service to the Spanish state in the last 18 years.

RENADE's activity focuses on maintaining the European Union emissions rights register, a standardized electronic database, whose function is to ensure accurate accounting of the issuance, ownership, transfer, delivery and deletion of all rights. emissions issued under the EU Emissions Trading Scheme (ETS). In this context, since the incorporation of MiFID II into the financial panorama, emission rights are considered to be financial assets, which is why RENADE also monitors all market players that purchase and sell emission rights, in any form (auctions, financial derivatives in the form of forward contracts, spot contracts, bilateral contracts, etc.), that they have a holding account opened in the Spanish area of the Union Registry.

The objective of these emission rights is to maintain control of GHG emissions in Europe of the taxpayers required to be part of this Registry (presently, airlines, industries and, in the near future: maritime transportation, among others) or also of taxpayers that voluntarily join the Registry to trade with emission rights. In both cases, it is necessary to open a RENADE account to register these emissions. The taxpayers may purchase emission rights to comply with their emissions and/or, on the contrary, sell the surplus.

Additionally, RENADE, in line with the guidelines set out in Fit for 55 and the European Green Deal, also provides coverage to the OECC in assisting working groups within the competent authorities at the European level (European Commission and UN) and national (Spanish National Securities Market Commission ((CNMV)), Ministries, autonomous communities, etc.).

RENADE carries on these activities with the conviction that customer service quality is one of its most important assets and, to this end, it offers assistance through telephone management, email or different manuals and significant information to the Registry, constantly updated on the renade.es website. Likewise, and to guarantee the confidentiality of the data it handles, RENADE is working on acquiring certification in the National Security Scheme (NSS).

# 3. Social Contribution of BME

## 3.1 Commitment to Our Human Capital

The mission and vision of BME can only be achieved through its employees, the Company's most valuable asset. Conscious of this, through the Human Resources area, their professional and personal development is promoted through quality employment that is generated thanks to a diverse safe work environment in which employees can develop their full potential.

As a result of its efforts, as in 2022, BME did not receive any fine or significant firm penalty for non-compliance with corporate regulations (2-27).

### Employee Figures

Women	Men
35.56% of the workforce	64.44% of the workforce
26.69% of recruitment in 2023	70.31% of recruitment in 2023
98.77% have a permanent contract	98.52% have a permanent contract
57.01% between 30 and 50 years old	56.34% between 30 and 50 years old
17.28% hours of training on average in 2023	16.63% hours of training on average in 2023
99.40% work in Spain	99.51% work in Spain

The data on employees collected in this report refer in aggregate to the BME Group's workforce. It should be noted that in 2023, Openfinance was excluded from the Group's

scope and SIX Financial Information España was included, so the previous year's data are not strictly comparable.

## Attraction and Retention of Talent (404-1, 404-2)

BME considers the learning, professional development and recognition of its employees to be especially relevant as key factors in attracting and retaining talent, and therefore rewards the achievement of results and the culture of individual effort through the promotion and development of its employees, the provision of fringe benefits, the commitment to diversity and occupational health and well-being.

To demonstrate these professional opportunities to society, a program to promote BME as an employer brand (branding employer) began in 2023, focusing on facilitating the search for professional offers for job seekers, showing the fringe benefits offered by the Company and highlighting their values and their contribution to society.

### a) Remuneration Policy and Professional Promotion Measures (2-20)

For BME, the professional development of its workers is presented as a vital opportunity to retain talent and, to this end, it promotes a work environment that allows its employees to grow in all aspects. In this context, BME provides job promotion opportunities to its employees through the attainment of goals based on three main criteria: an annual evaluation of performance, training and track history in the position.

Within this dynamic, BME recognizes that employment quality is intrinsically linked to attractive salary conditions, adjusted to the performance of its employees. These conditions are determined through a Remuneration Policy whose primary objective is to attract, retain and motivate the Company's professionals. This policy is based on a set of appropriate procedures to align market dynamics with the business's strategic objectives and it comprises three items:

- 1. Fixed remuneration:** this comprises the base salary established in the applicable Collective Bargaining Agreement and a personal supplement that remunerates, in the total absence of discrimination, the employee's professional background, the responsibility of the work post and the professional level exercised and determined by the content of the position held.
- 2. Variable remuneration:** based on the annual variable remuneration in line with the attainment of the Group Performance Factor (GPF) and that of the area and the medium-term remuneration, whose purpose is to attract, retain and commit mainly the executives and outstanding people at the Group.
- 3. Fringe benefits:** such as aid for physical or mental disabilities of children and attention to diversity, scholarships for employees' children, daycare tickets, study aid for employees and their children, aid for birth and marriage, interest-free payroll advances, personal loans or benefits to disabled employees.

### b) Employee Training and Development of Talent (3-3, 404-1)

BME considers training to be an essential component for the development and growth of its team and is, therefore, firmly committed to the implementation of plans that strengthen the training and professional growth of its collaborators, ensuring development opportunities for all of them.

The intention of these plans is to promote both specific technical skills and provide multidisciplinary training that encourages employee growth. Hence, the Training Department offers support to all workers to facilitate a continuous training process in their roles.

The Training Plans at BME are executed through the Training and Development Department, integrated into the Human Resources area, in collaboration with the Training Committee set up in 2021, which has a workers' labor union. These plans are renewed annually, aligned with the business objectives and needs identified through the SIX Academy.

Since its inclusion into SIX, the BME Training Plan incorporates the SIX training offer, adding additional courses to the skills inherent to the position, so that the global SIX training offer is integrated into the local BME catalogue. Likewise, in 2023, the Company worked in close collaboration with the BME Institute to offer employees continuous updates in financial and technological areas.

During 2023, BME provided its employees with technical knowledge in areas such as ESG, finance and technology, as well as personal skills such as team management, communication and leadership. The Company also offers a full catalog of language courses including German, English and French, which is even more relevant following the integration into SIX to create a diverse international work environment. All of this reflects the Company's commitment to offer quality training, keeping its team up to date and providing opportunities to develop both professional and personal skills.

Additionally, to constantly improve its training offer and thus satisfy the needs of its workforce, BME requests the opinion of its employees on the training carried out. This initiative seeks to bring relevant and interesting topics to employees, thus promoting their growth and development, both professionally and personally.

During 2023, 15,870 hours of training were provided (25,594 in 2022), which equates to an average of 16.8 hours per employee.

### c) Fringe and Other Benefits for Employees (3-3, 401-2)

BME promotes labor flexibility and the reconciliation of a work-life balance between its permanent and temporary employees, to the same extent, with various initiatives: paid and unpaid leave, reduced working hours due to legal guardianship and breastfeeding, flexibility in entry and exit times, five-and-a-half-hour days on Fridays and the eve of vacations, limitation on the number of overtime hours per employee and the possibility to request vacations at any time, which can be divided into several periods. Likewise, its remuneration policy includes fringe benefits as part of its remuneration package. Its regulation and scope are governed by the Collective Bargaining Agreement. Some of these benefits include: scholarships for children, health care insurance, life insurance or retirement bonuses.

Employees can also use the BME Conecta mobile app, through which they can access online human-resource functionality and other services and offers for employees. These include corporate volunteering activities with the Madrid Food Bank and the Prodis Foundation.

As a result of the aforementioned measures, the turnover rate in 2023 was 6.1% compared to 7.4% the previous year (401-1).

## Fringe benefits



**Work-life balance.** Among other measures, unpaid and paid leave, reduced working hours for legal guardianship and breastfeeding, five-and-a-half hour days on Fridays and the eve of vacations, and a limitation on the number of overtime hours per employee.



**Digital disconnection.** BME has had a right to disconnect policy in place since 2020.



**Telecommuting and remote connection payment.** BME makes the possibility of part-time remote work available to employees and pays them an allowance to facilitate remote connection.



**Special conditions for services provided by third parties.** BME provides services and offers for employees such as a Benefits Club.

## Commitment to Diversity, Equity and Inclusion (3-3)

BME, hand in hand with SIX, is committed to diversity and equal opportunities, creating an environment in which people are valued for their contributions, regardless of their hierarchy, country of origin, ethnicity, gender, nationality, age, orientation sexual, physical or religious condition. The basis for creating a healthy motivating work environment is fair and respectful interaction, free from all forms of discrimination, harassment or retaliation, with this constituting the basis of the Group's values. Thus, **all Company practices for human resource management are governed by the commitment of BME to the equality and diversity of its employees.**

In line with the commitment to diversity and equal opportunities, applied in all of the human resources management policies of BME, the Company has started working on its Equality Plan, in line with the strategy of the SIX Group to which it belongs, which is in the negotiation phase with the unions. At its meeting on December 20, 2023, the Board of Directors of BME was informed of progress with preparation of the BME Group Equality Plan, which was pending completion of the mandatory negotiations with workers' representatives. Approval of this Plan is expected to be included on the agenda for the first regular meeting of the Board in 2024, following analysis by the Appointments and Remunerations Committee.

Likewise, BME has a Joint Equality Commission with the purpose of analyzing and, where appropriate, implementing the possible resulting measures in terms of Equality of the Group companies. Hence, the people management practices of BME are governed by the commitment of BME to diversity and equality. Specifically, the remuneration, promotion and training policies promote the recruitment, retention and commitment of employees following criteria of merit and capacity of each position. In other words, individual performance, dedication, the quality of the work performed and the responsibility assumed are rewarded, regardless of gender, which prevents any type of direct or indirect discrimination based on gender. For its part, the establishment and use of personnel selection procedures guarantee confidentiality, independence and equal opportunities.

In this regard, and being aware that the responsibility of companies begins with the promotion of good labor practices and the promotion of equality and diversity among their employees, **at the end of 2021, BME launched the IBEX® Gender Equality Index to create more transparency with regards to this topic**, on which 45 companies participated in 2022. In this way, BME shows its firm commitment to SDG 5 on gender equality, helping to raise awareness on this goal at Spanish companies.

As part of the SIX group, BME is committed to creating a work environment where diversity and equal opportunities are intrinsic issues to its activities regardless of their professional category, origin, race, gender identity, nationality, age, sexual orientation, status physical or religious belief. These principles constitute the essential pillars of the values that guide the group and, consequently, all the Company's human resources management policies are based on the commitment of BME to the equality and diversity of its team.

In line with its commitment to diversity and equal opportunities, all BME human resources management policies, salary, promotion and training policies promote the attraction, retention and commitment of employees in line with merit and capacity criteria for each position. Individual performance, dedication, excellence at work and the assumption of responsibilities are valued, without taking into account gender, avoiding any type of direct or indirect discrimination based on sex. For its part, the establishment and use of personnel selection procedures guarantee confidentiality, impartiality and equal opportunities.

Additionally, as in previous years, BME has promoted International Women's Day with a Ring the Bell for Gender Equality held in Bilbao, as part of the program of events and activities to celebrate Diversity Week, which took place in March 2023, including most notably the debate "Female talent and its contribution to finance and the company", which was held following Ring the Bell for Gender Equality. However, the commitment of BME to diversity and equality goes beyond gender and promotes an inclusive and accessible work environment through the installation of ramps, lifts, Braille signage, etc., in which employees with disabilities can fully perform their duties.

Also, SIX includes among its priority objectives, respect for dignity, equality, integrity and the remaining essential rights in all its actions and conducts. Therefore, the complete eradication of situations of discrimination, harassment or bullying, in the different aspects in which they can occur in the work environment, is an issue considered essential for the Company. In this regard, and to ensure zero tolerance, SIX has put into place its "Compliance Directive 8 on discrimination, workplace harassment and sexual harassment". This Directive includes a procedure for action against signs of discrimination, workplace or sexual harassment that specifies the existing notification channels for their correct notification and management. In either 2023 or 2022, there were no incidents related to discrimination or breaches of human rights (406-1). BME fully assumes the United Nations Universal Declaration of Human Rights and its protocols in its labor practices, having complied with the United Nations Global Compact since 2011.

To reaffirm its commitment to international human rights and labor rights and to respecting these rights as an employer and supply chain partner, SIX has published a Human Rights Statement. The statement was approved by the Chairman and CEO of SIX and covers compliance with the UN Guiding Principles on Business and Human Rights (UNGPR), the International Bill of Human Rights, and the core standards and principles of the International Labor Organization (ILO). The SIX Human Rights Statement is available online.

Given the absence of risk in terms of human rights, BME has not processed any significant investment agreement in which clauses relating to human rights have been included (2-27).

As a consequence of the adequate application of the measures contained in the remuneration policy for BME employees, **in 2023, the salary gap in the senior management, middle management and specialized staff categories fell** compared to 2022.

### Wage gap (\*) (405-2)

	2022	2023
Senior management	1.23	1.07
Middle management	1.13	1.21
Specialized staff	1.02	1.03
Administrative / Auxiliary / Support	0.95	1.01

(\*) The wage gap was calculated as the ratio between the average remuneration of men compared to the average remuneration of women, by professional category. For the calculation of said averages, the number of days that the worker has belonged to the Company during the financial year, the daily remuneration received during said period and the number of employees at year-end has been taken into account.

## Promotion of the Health and Well-Being of Our Employees

(3-3, 403-1, 403-2, 403-3, 403-6, 403-7, 403-10)

BME attaches great importance to the protection and promotion of the health and well-being of its employees. The promotion of health and safety in the workplace are essential aspects for the Company and therefore, at all its work centers, BME implements health, safety and prevention measures in accordance with the Occupational Risk Prevention Law. Additionally, annual risk assessments are carried out to prepare a plan that reduces the identified risks and meets the needs of workers through the implementation of preventive measures. As a result of these measures, in 2023, the frequency rate was 1.65 and the severity rate was 0.01.

To supervise and advise on health and safety programs, both at work centers and at remote stations, BME has set up various committees: Health and Safety Committee, Evacuation Team, Emergency Team and First Aid Team.

The Health and Safety Committee is responsible for receiving and managing complaints and suggestions related to occupational safety and health through a mailbox associated with the prevention, health and hygiene delegates.

BME strives to offer a healthy work environment, constantly ensuring the well-being of its employees. Hence, and given that BME employees are not exposed to a work environment in which prevention risks exists, in 2023, as in the previous year, no occupational diseases were identified.

In addition, the Company offers physiotherapy services, flu vaccination campaigns, first aid kits in all work centers and a nursing service in Las Rozas, complemented by telephone support that allows consultations by video call in all centers and provides annual medical examinations. and medical assistance insurance for its employees and their families.

In terms of mental health, BME prioritizes the emotional well-being of its employees and for this reason, in 2023 it has launched a psychosocial risk assessment for all the group's companies that will allow us to know the mental and professional health of its employees. In addition, as part

of the SIX Group, the Company has a free and confidential employee assistance program that offers help to address different work and/or personal issues, through professional advice to manage emotional, practical or physical needs.

## Training in Health and Safety (403-5)

To strengthen the health culture, BME ongoing training courses on health and safety and information campaigns that highlight these aspects, encouraging all employees to actively participate in promoting a safe and healthy environment. In this regard, 870 hours of ORP training were provided to the entire workforce for courses on Occupational Risk Prevention, First Aid and Emergencies.

Additionally, all newly-recruited employees take an online training course on standards and actions in relation to occupational risk prevention. In addition, BME has a Health Surveillance program in which information and training are provided through the Choose Health Channel.

Furthermore, with the collaboration of the Human Resources and Corporate Communication areas, the First Aid Kit Service reports on blood donation campaigns and provides health workshops.

## Labor Relations (2-30)

BME guarantees all its workers the right to belong to labor unions freely for the promotion and defense of their economic and corporate interests. The union representative bodies of the workers and the technical committees derived from the Collective Bargaining 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 and the involvement of workers in the management of the Company in terms of information, consultation and participation.

In 2022, the BME Group Collective Bargaining Agreement was unified, resulting in the inclusion of the governing companies of the Barcelona and Bilbao Stock Exchanges in the statutory Collective Bargaining Agreement of Plurality for Companies Related for Organizational and Productive Reasons in force for 2021-2023. All employees (100%) of the BME Group who provide their services in Spain (except BME Latam SAS and LATAM Exchanges Data Inc) are subject to said agreement.

Furthermore, BME has different mechanisms for involving its employees in the company's decision-making, such as meetings with the CEO and the group's senior management where business results and the group's general strategy are shared, or the Employee Culture Survey carried out annually.

## 3.2. Workers in the Value Chain (3-3)

In addition to its own staff, BME has 308 external employees (2-8) to help it perform certain activities, related mainly with the operation and maintenance of various computer functions, and it leverages its supply chain to acquire the products and services necessary to carry on its business dealings.

In this context, BME seeks to transmit its commitment to sustainability to its supply chain by promoting good practices, evaluating suppliers and including sustainability clauses in contractual relationships, to respect the environment and society in general.

## Monitoring Indicators for the Sustainable Value Chain



The suppliers of BME must comply with different quality standards depending on the type of products and services they offer, be upright in their business practices and comply with the regulations governing their activity, issues that BME addresses through specific actions and measures such as the control of goods and the supply of services and the selection and evaluation of suppliers

### Supplier Profile (2-6, 414-1)

The BME Group companies, with the exception of BME Latam SAS and LATAM Exchanges Data Inc, mainly carry out their activities in Spain, and are committed to suppliers that operate in Spain as the geographical area in which purchases, services and billings (local suppliers) are

described in this chapter.

Likewise, BME has an internal invoice management procedure that covers the operation of the BME invoice management and authorization system, from the receipt of the invoice to the corresponding payment and filing.

## SUPPLIERS

	2022	2023
Local suppliers	1,318	1,237
Non-local suppliers	134	143
<b>Total</b>	<b>1,452</b>	<b>1,380</b>

The suppliers of BME belong mainly to the technology sector (equipment supplies and IT solutions), support (consulting,

auditing, travel agencies) and maintenance (property and facilities improvement and management).

## Purchase Volume (204-1)

### Billing for Services from External Suppliers

	2022	2023
Volume invoiced by suppliers (thousands of euros)	45,634	82,655
Local suppliers (%)	57.53	75
Non-local suppliers (%)	42.47	25

### Average Payment Period to Suppliers

As in previous years, **BME has settled all payments of invoices to suppliers within the maximum legal period established**. In 2023, the average payment period of BME was 34 days. In compliance with current regulations

regarding the fight against delinquency in commercial operations and corporate governance, said information can be found on the Company's corporate website ([www.bolsasymercados.es](http://www.bolsasymercados.es)).

### Average Payment Period to Suppliers in Number of Days

	2022	2023
BME	46	34
Other Group companies	41	33

### Integration of Sustainability in Relationships with Suppliers (2-6, 308-2, 414-1, 414-2)

The "Order Authorization System" (SI3) is the system that supports each of the phases of the supply process of products and services (initiation, approval, budgetary

control and order payment management) and, among others issues, allows:

1. the identification and minimization of supply chain risks thanks to the supplier's commitment to regulatory compliance (economic, environmental and socio-labor);
2. the strengthening of the organization's cost management; and
3. the ascertainment of the origin and geographical location of the product components which, in the case of local suppliers, makes it possible to reduce the CO2 footprint of the product in question.

Furthermore, BME has a series of mechanisms that help the company to continue developing the sustainable and responsible management of its supply chain. In this context, during 2023, BME asked its suppliers to sign a statement of compliance with the economic and technical requirements necessary to be contracted, as well as with environmental, social, occupational health and safety, and human rights regulations. In 2023, specifically, 82 new suppliers signed the statement of compliance (44 in 2022).

For its part, the risk area of BME monitors suppliers to ensure that they do not pose an added level of risk. To do this, they classify suppliers based on their relevance and, depending on their risk, they establish a series of controls to cover vulnerabilities.

No supplier audits were conducted during the year 2023.

At group level, the SIX Code for Suppliers lays down binding guidelines on business ethics and compliance as well as on labor standards and environmental protection. The Code for Suppliers, which forms a binding element of the supplier contracts of SIX, was updated with new sections on corporate governance and ESG aspects in 2023.

### 3.3. Relationship with the Community (3-3, 413-2)

The impact of BME on society is evident in national economic stability, the strengthening of business competitiveness, the generation of employment and support for the growth of small and medium-sized enterprises, as well as the promotion of sustainable finance through ESG products. However, this impact goes beyond financial markets by promoting social initiatives such as the disclosure of financial knowledge, support for local communities or investment in training and culture (3-3).

Also, and as stated in the environmental chapter, the activity of BME does not generate impacts on its environment, either in environmental terms or in social terms, since its activity takes place in urban areas, in which there are no protected spaces or local communities affected.

#### Positive Contribution of BME to Society in Figures



#### Generation of Positive Socioeconomic Impact through the Company's Activity

Through the dissemination and provision of value-added services to listed companies, intermediaries and other investment service companies, BME strengthens market transparency, investor protection and security, non-discriminatory participation in the markets, channeling from saving to productive investment, and adds value to the national economy as a whole in terms of economic growth and job creation.

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

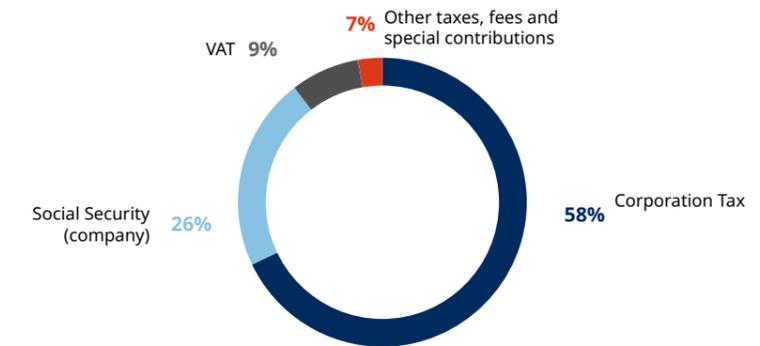
## Tax Transparency

	Country	2022	2023
Income from sales to third parties (thousands of euros) <sup>(1)</sup>	Spain	276,564	265,546
	Germany	-	-
	United States	-	-
	United Kingdom	1,700	2,758
	Luxembourg	17,196	25,416
Income from intragroup transactions with other tax jurisdictions (thousands of euros)	Spain	1,862	7,270
	Colombia	356	360
	United States	-	-
	United Kingdom	189	462
	Luxembourg	1,249	2,411
Tangible assets (thousands of euros)	Spain	62,782	71,100
	Colombia	-	-
	United States	-	-
	United Kingdom	-	-
	Luxembourg	150	89
Profit before taxes (1) (thousands of euros)	Spain	193,078	104,512
	Colombia	39	-39
	United States	-1,402	-
	United Kingdom	269	11
	Luxembourg	12,968	3,903
Income tax (thousands of euros)	Spain	41,601	31,709
	Colombia	20	-
	United States	-	-
	United Kingdom	48	3
	Luxembourg	3,242	997
Total tax contribution (2) (thousands of euros)	Spain	104,644	105,706
	Colombia	105	102
	United States	12	11
	United Kingdom	591	278
	Luxembourg	4,687	1,767

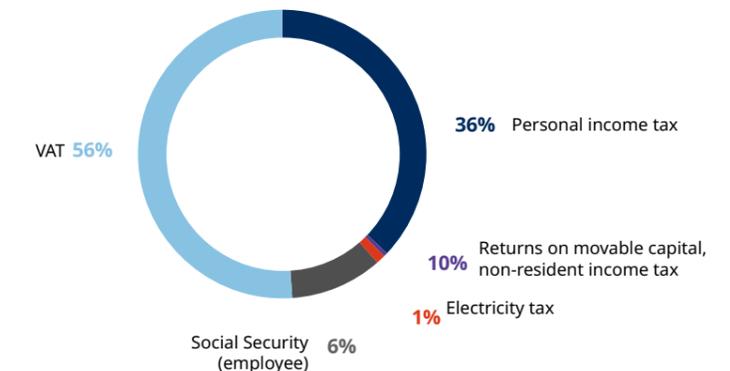
<sup>(1)</sup> 2022 data re-formulated after alignment with the 2023 criteria

<sup>(2)</sup> Includes the taxes borne that represent an effective cost for the Company and its Group and the taxes collected that are paid on behalf of other taxpayers due to the economic activity generated.

## Taxes Borne in 2023



## Taxes Collected in 2023



### LEGEND:

VAT: Value Added Tax. PIT: Personal Income Tax. NRIT Non-resident income tax. IMC: Income from movable capital. Social Security (Company): Personnel expenses related to Social Security.

	2022	2023
Average BME Group Corporation Tax rate <sup>(*)</sup>	24.76%	26.94%
General tax rate	25.00%	25.00%

<sup>(\*)</sup> The difference between the average BME Group Corporation Tax rate applied and the general Corporation Tax rate in 2021 and 2022 is due to certain permanent differences that are not tax deductible and consolidation adjustments that are not part of the consolidated tax base either.

Also, BME contributes to generating a positive socio-economic impact on society through its commitment to local suppliers that operate in the same geographical location in which purchases, services and billings are

performed, maintaining a commitment to local employment and the supply of local products and services (see chapter 3.2 'Workers in the Value Chain' for more information).

## Promotion of Financial Knowledge (203-1, 203-2)

BME is firmly committed to the disclosure and publication of knowledge in financial matters. Due to the significant role of the Company in the financial markets, BME, through its training subsidiary, the BME Institute, assumes the **promotion of financial culture as one more function in its activities**, complying with the recommendations and good practices for Financial Awareness and Education of the Organization for Economic Cooperation and Development (OECD).

The BME Institute focuses its activity on organizing different training services linked to markets and technology, being a close collaborator of the Financial Education Plan. The training programs promoted by the BME Institute are aimed at professionals in the financial sector and its regulatory bodies, individual investors, students and, in general, anyone interested in entering or going into depth in the world of

finance, thus facilitating access to and the understanding of matters related to the financial world to as many people as possible. In this regard, the BME Research Service prepares, filters, selects and distributes statistics from the BME Group's markets and systems, reports and documentation on what happens in national and international financial markets

Thus, **the financial disclosure activity of BME facilitates the development of the Company's financial skills**, promoting the improvement of the understanding of financial products, concepts and risks, through training, instruction and advice. In this regard, BME actively contributes to the sustainable growth of the companies' business and to the improved protection of investors' rights. To this end, the financial disclosure of BME revolves around four axes:

### Financial Education



- BME regularly collaborates in the organization and implementation of the Financial Education Day initiative as part of the Financial Education Plan, promoted by the Bank of Spain, the National Securities Market Commission (CNMV), the General Directorate of Pension Funds and the General Secretariat of the Treasury and International Financing.



- The BME Institute celebrates financial education day with the organization of webinars focused on the accessibility of the vulnerable population to financial services.



- Holding of the Inspiring Girls Finance Forum.
- BME, through the Economic Information Journalist Association (APIE), held a course in 2023 aimed at training financial journalists.

### Symposiums, Fairs and Other Activities Related to the Stock Market

BME collaborates, directly or indirectly, in the following:

- Annual Assembly of the UN agency Global Compact.
- Sponsorship of the OFISO annual conference, at which the latest news on green bonds, carbon markets and developments in sustainability regulation were discussed.
- Sponsorship of Hack & Disrupt in Bilbao, on how to innovate in sustainable finance.
- Forums with the CNMV to promote IPOs and the financing of companies via markets.

### Financial Prizes in 2023 (\*)

- 30th AEFIN Finance Forum.

### Financial-Stock Market Training

- Braindex, the 100% online educational environment that offers courses related to financial markets and products, disclosure, technology and regulation applied to the sector, already has 44 courses of different levels and has increased its collaborators. During 2022, agreements were reached with CUNEF and ISDE, which shows the growth projection of this tool.
- BME collaborates, directly or through the BME Institute and the four Stock Exchanges, in training projects and provides specific courses and seminars aimed at:



**Universities** (Malaga, Basque Country, San Pablo CEU, Cantabria, Castille la-Mancha, Saragossa, Alcalá de Henares, Salamanca, Santiago, ISDE, UNED, Politécnica de Madrid).



**Training institutions** (University College of Financial Studies, EAE Business School, IEF, the Maria Jesus Soto Foundation and the Financial Studies Foundation).



**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 and/or organizes other training initiatives in financial-stock-market matters such as, among others, the MFIA event and presentations or courses on various topics such as finance ethics, 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 stock markets through the direct publication of books or magazines and the sponsorship of various publications

## Promotion of Local Development (413-1)

The commitment to support the local community that BME has been assuming is maintained, especially with respect to the world of culture, being a member of the Friends of the Prado Museum Foundation in Madrid, a member of the Board of Trustees of the Naval Museum Foundation

and the National Archeological Museum and patron of the Guggenheim Museum in Bilbao, among other institutions.

Likewise, in 2023, BME committed to the Juan XXIII Foundation, the Soledad Cazorla Women's Foundation and the Luzón Foundation.

### Financial Investment by BME Intended to Benefit the Community (thousands of euros)

	2022	2023
Patronage and cultural promotion	138.2	151.01
Donations	47.9	12.0
Training and financial culture	1,026.0	1,626.0
Socioeconomic development (Awards)	3.6 <sup>(1)</sup>	3.6 <sup>(1)</sup>

<sup>(1)</sup> Of the amount of 1,391 thousand euros, 139 thousand euros correspond to the valuation of scholarships in training programs. Likewise, it corresponds to the valuation of non-monetary prizes consisting of training programs valued at 37 thousand euros.

## Support and Membership of Associations <sup>(2-28)</sup>

	Holds Position <sup>(1)</sup>	Participates in a Project <sup>(2)</sup>	Is a Member <sup>(3)</sup>
<b>National Associations and Institutions</b>			
Association of Venture Capital & Private Equity Entities (SPAINCAP)	-	-	YES
Alastria	YES	YES	YES
Spanish Issuers	-	YES	YES
Association of electronic companies, IT, Telec. (AMETIC)	-	-	YES
Spanish Association of Bioindustry (ASEBIO)	-	YES	YES
Inverco	-	YES	YES
Círculo de Economía	-	-	YES
Barcelona Financial Center	-	-	YES
<b>Supranational Associations and Institutions</b>			
Ibero-American Federation of Stock Exchanges (FIAB)	YES	YES	YES
European Capital Markets Institute (ECMI)	YES	YES	YES
International Organization of Securities Commissions (IOSCO-IOSCO)	-	YES	YES
Center for European Policy Studies (CEPS)	-	YES	YES
Futures Industry Association (FIA)	-	YES	YES
Spanish SWIFT Users Group (SWIFT GNUSE)	-	YES	YES
European Central Securities Depositories Association (ECSDA)	YES	YES	YES
AFME – Securitization Division (formerly: European Securitization Forum)	-	-	YES
European Association of CCP Clearing Houses (EACH)	YES	YES	YES
UN Sustainable Stock Exchange (SSE)	-	-	YES
UN Global Compact	-	-	YES

**(1)** (1) Associations or institutions in which one of the BME Group companies holds a position on its governance body. BME is a member of WFE, FESE, FISD through SIX.

**(2)** (2) Associations or institutions in which any of the BME Group companies participate in their projects or their committees.

**(3)** (3) Associations or institutions in which one of the companies of the BME Group considers that being a member responds to a strategic decision.

## 3.4 Clients and End Users

The clients and end users of BME are, mainly, entities supervised by the CNMV and represent one of the most significant stakeholders for the Company. For this reason, BME offers them different communication channels to achieve a transparent and professional relationship and offer a service of the highest quality and offers them a wide range of training activities that allow them to act with knowledge in a responsible manner.

In the field of individual investors, BME has the figure of the Investor Protector, responsible for dealing with and examining the complaints, claims and challenges that investors make about the operations they carry out on the Madrid, Barcelona, Bilbao and Valencia Stock Exchanges and in relation to them, analyzing the actions of market members, institutions receiving orders, security issuing entities and other parties involved in the contested operations. Likewise, the office of the Investor Protector promotes the creation of conditions that allow the clarification of the facts and doubts raised by investors and the intermediation between the parties. In 2023, the Investor Protector has received 12 inquiries-claims on the Madrid Stock Exchange and one on the Valencia Stock Exchange. However, no claims or complaints were filed requiring the involvement or resolution of the protective party.

Regarding the Claims Systems, complaints received and their resolution that affect BME, although BME does not have a centralized SAC, the Company provides its stakeholders, clients and users with the email address and telephone numbers of each of the Business Units through which they can transfer any complaint, suggestion or concern.

In 2023, one claim was received and it was answered and resolved during the year. In 2022, no claims were received in this regard.

In this regard and to improve the management of its clients, in 2023, BME launched a "Know You Client" (KYC) Due Diligence process for the communication and review of the information presented by IBERCLEAR and BME Clearing participants during the on-boarding process, as well as its periodic review. This process will apply to both new and existing participants and the migration is planned to be completed by the third quarter of 2024.

Lastly, with respect to data protection BME complies with Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of individuals with regard to the processing of personal data and the free circulation of these data (GDPR), as well as the rest of the applicable local regulations regarding the protection of personal data. BME has internal policies and procedures that regulate, among other issues: privacy from design and by default, confidentiality and information security, the management of security breaches that affect personal data and the exercise of rights by interested parties.

BME carries out periodic controls and external audits to guarantee compliance with these obligations and registers, maintains and updates its personal data processing activities. Another significant data protection milestone was the appointment by the Board of Directors of BME of Jorge López Baqueriza as the new DPO of the BME companies domiciled in Spain, replacing the previous DPO.

As a result of these efforts, in either 2023 or 2022, there were no claims in relation to breaches of privacy and the leakage of personal data by BME Group employees or contacts and clients of BME Group companies.

# 4. Responsible Governance

BME, as the market operator for the Spanish financial markets and systems, must be an example for companies, issuers and investors in the area of good governance, transparency, ethics and regulatory compliance. In this regard, BME not only has the necessary tools to do so, but it also adopts these issues as part of its nature and applies them throughout its value chain.

In all its activities, **BME is supported by a responsible management framework**, which comprises all the corporate codes, policies and procedures that define the lines of action of all the professionals who act on behalf of the Company. This responsible management framework has been harmonized with the compliance policies, procedures and tools of SIX from the date of integration of both companies until 2022, when this process has ended.

## The BME Group and Responsible Management in Figures



and alignment with the good corporate governance best practices, a firm commitment to ethical and transparent management and, lastly, adequate risk management that

will strengthen the resilience of the business in the long term.

## Good Corporate Governance

### a) Governance Bodies of BME (2-9, 2-11, 405-1)

At December 31, 2023, the Board of Directors, the Company's highest governance and administrative body, comprised six members of recognized capacity, honor and independent criteria.

The professional backgrounds of the members of the Board of Directors, which are available on the corporate website [www.bolsasymercados.es](http://www.bolsasymercados.es), detail the positions and

activities they carry out at BME Group companies and other non-Group companies. The directors classified as external proprietary directors, who account for 50% of the directors, represent the sole legal entity shareholder, which holds a 100% stake in the Company's share capital, SIX Group AG (2-13)

### Composition of the Board of Directors at December 31, 2023

Directors	Board position	Character	Seniority on the Board	Committees	
				Audit and Risk Committee	Appointments and Remunerations Committee
Mr. Jos Dijsselhof	Chairman	External proprietary	18.06.2020	-	Director
Mr. David María Jiménez-Blanco Carrillo de Albornoz	Deputy Chairman	External independent	26.04.2018	Director	Chairman
Mr. Javier Hernani Burzako	Chief Executive Officer	Executive	27.04.2017	-	-
Ms. Marion Leslie	Director	Director	30.07.2020	-	-
Ms. Belén Romana García	Director	Director	30.07.2020	Chairwoman	Director
Mr. Daniel Schmucki	Director	External proprietary	18.06.2020	Director	-

Secretary of the Board and of the Committees: Ignacio Gómez Sancha (since July 1, 2023)  
Vice-Secretary to the Board and the Committees: Ms. Cristina Bajo Martínez

In terms of diversity, 33% of the Board of Directors of BME is female, which is in line with its best corporate governance practices.

### BME Directors by Gender and Age at December 31 of Each Year

	2022	2023
Women	2 (33%)	2 (33%)
Men	4 (66%)	4 (66%)
< 30	0	0
30 - 50	0	0
> 50	6 (100%)	6 (100%)

The delegated committees of the governance body include the Appointments and Remunerations Committee and the Audit and Risk Committee, which is entrusted, among others, with assessing matters related to the Company's non-financial risks, including operational, technological, legal, social, environmental, political and reputational risks, as well as with coordinating the process of reporting non-financial information (2-13).

In 2023, no specific anti-corruption training was given to the members of the Board of Directors of BME. However, the directors of BME receive ongoing training through the meetings of the Board of Directors and its delegated Committees, at which the most significant issues for the Company are addressed from a financial and non-financial point of view (205-2).

For more information on corporate governance, you can visit the "Corporate Information" section of the BME website.

## b) Organization of BME

The Board of Directors of BME delegates the executive management of the businesses to the Executive Board of BME, which ensures the alignment and coordination of the BME Group with the recommendations of the Business Unit and Corporate Area of the SIX Group, of which it forms part, as well as guaranteeing direct coordination in the management of the BME Group companies, when it refers to those issues and initiatives that exclusively affect BME Group companies. Additionally, it is the responsibility of

the BME Executive Board to promote, direct and supervise those matters of special importance for the Company.

Within this Committee there is the figure of the Chief Executive Officer, who is the chief executive of BME and who is responsible for the management of the Company's ordinary business, with the highest executive functions and the members of the Executive Board, which is hierarchically answerable to the Chief Executive Officer (2-11).

## Executive Board at December 31, 2023 <sup>(1)</sup>

Ms. Marta Bartolomé Yllera (Chief Financial Officer)
Ms. Beatriz Alonso-Majagranzas Cenamor (Director of Markets and Market Data)
Mr. José Manuel Ortiz Repiso Jiménez (Clearing Director)
Mr. Jesús Benito Naveira (Director of Settlement and Registration)
Ms. Berta Ares Lombán (Director of Value Added Services)
Mr. Ignacio Olivares Blanco (Legal Advisory Director)
Mr. Arturo Merino Ginés (Technology Director)
Mr. Pablo Malumbres Muguera (Corporate Communication and Public Affairs Director)
Mr. Jorge Yzaguirre Scharfhausen (Deputy Director of the SIX Securities Services Business Unit)
Mr. Luis García Berral (Human Resources Director) <sup>(2)</sup>

(1) Mr. Javier Hernani Burzako, Chief Executive Officer and chief executive of BME, heads the Executive Board.

(2) He regularly attends the Executive Board meetings.

## Members of the BME Executive Board by Gender and Age at December 31 of Each Year

	2022 <sup>(1)</sup>	2023
Women	3	3
Men	7	7
< 30	0	0
30 - 50	3	2
> 50	7	8

(1) Data restated in error in the 2022 report

## c) Remuneration of the Board of Directors and Senior Management of BME (2-19, 2-20)

The remuneration of the directors and senior management are determined respectively by the Directors' Remuneration Policy of BME and the BME Group's Remuneration Policy.

The Directors' Remuneration Policy is transparent, maintains a reasonable proportion 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 in a way that promotes the long-term profitability and sustainability of BME. Likewise, this Policy seeks to attract, retain and engage the most outstanding professionals.

Based on this Policy, BME directors receive a fixed amount for the performance of their duties and an amount corresponding to allowances to attend meetings.

For its part, the SIX Group's Remuneration Policy, which defines the remuneration of senior management, is applicable to all persons who maintain an employment relationship with BME or with any of the companies that make up the Group and to those persons who, as a result of their status as members of the governance bodies of BME Group companies with executive powers, have their employment relationship with any of the Group companies suspended.

## Average Remuneration of Directors and Senior Management at BME by Gender <sup>(1)</sup>

(thousands of euros)

	2022	2023
<b>Directors</b>	<b>495</b>	<b>504</b>
Women	110	160
Men	687	676
<b>Senior Management <sup>(1)(2)</sup></b>	<b>444</b>	<b>387</b>
Women	340	369
Men	417	396

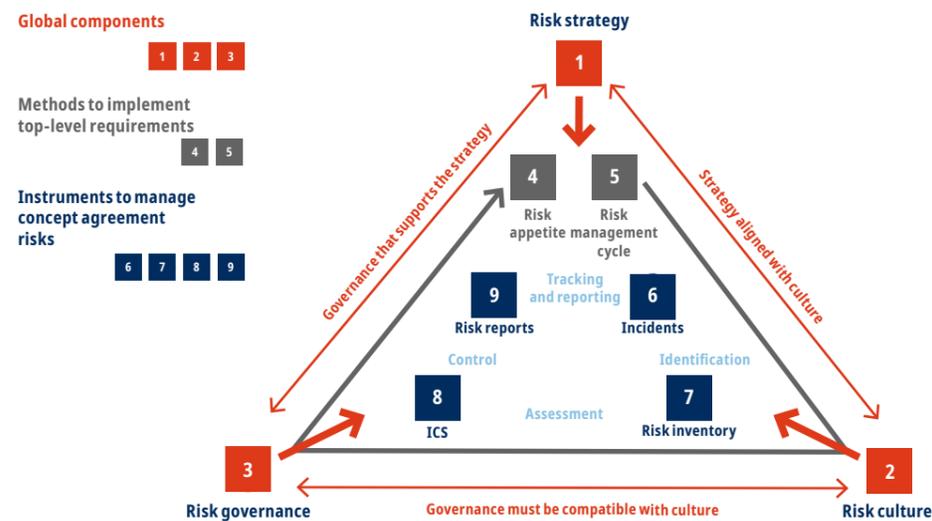
(1) The average remuneration of BME directors and senior management contained in this table includes all remuneration items received by directors, both in their capacity as such and for the executive duties they perform at BME, and members of senior management (including per diems, indemnities and settlements for the termination of the employment relationship and any other compensation, except for the estimate of or target for variable remuneration in 2023). Likewise, to calculate 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 have been taken into account.

(2) The amount of the average remuneration received by senior management does not include the average remuneration of the Chief Executive Officer and chief executive for their executive functions, as it was included together with the average remuneration received as Director.

## 4.1. Risk Management Framework (2-12, 2-13, 2-25)

As an operator of capital market infrastructures, BME is exposed to different types of risks. The Group's risk management framework includes and connects all the essential elements to thoroughly manage these risks and is therefore an indispensable and integral part of the Company's business.

The risk management framework comprises risk strategy, risk culture and risk governance. All methodological aspects to uniformly and actively manage risks, identify, evaluate, control, monitor and report on risks, are integrated into it.



In this context, it is worth noting that in 2023 the corporate risk area has begun to carry out an independent risk assessment of those Company projects considered critical, and also of those for which the project team requests support from the risk function.

For more information on the risk management framework of SIX, refer to its 2023 Annual Report.

### Risk Strategy and Risk Culture

The group follows a risk management strategy that aims to minimize any risk that is not aligned with the business strategy. In this context, risk culture, which comprises all standards, attitudes and behaviors toward risks, is a vital part of corporate culture and risk management. Senior management commitment and leadership, along with open communication, build the foundation of a risk culture. To this end, regular awareness training is carried out throughout the group and employees are encouraged to actively

promote risk culture within their area of responsibility, as well as to continually improve and learn.

The Risk Culture, Risk Governance based on the principle of the three lines of defense, and the Risk Strategy, are the essential components that determine the design of the methods - Risk Appetite and Risk Management Cycle-, and risk management instruments.

As risk management instruments, the BME Group has:

- A **Register of Risk Events**, which includes materialized risks resulting from inadequacy or failure of internal processes, people or systems, or resulting from an external incident.
- A **Risk Inventory**, which provides a harmonized and coherent vision of the BME Group's situation in terms of risks. Both recently identified risks and those that already exist are periodically analyzed in terms of probability and impact, classified based on their materiality.
- An **Internal Control System**, which includes all the control processes that form the basis for attaining the business objectives and the proper functioning of the BME Group, guaranteeing their suitability, effectiveness and reliability.
- **Risk Reports**, which provide updated, concise and reliable information on which to make decisions.

### Risk Governance

In terms of risk management, the Continuity and Risk Committee, as a body answerable to the BME Executive Board, is in charge of carrying out, among other tasks, the monitoring and analysis of the identified risks, and of informing the Board of Directors, through 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 Executive Board.

Lastly, although the BME Risk Management Framework affects and involves all BME Group personnel, the main participants in the risk management model are, in addition to the Continuity and Risk Committee, the Executive Board and other Committees and departments, as follows:

Body at corporate level	Functions
Board of Directors	<ul style="list-style-type: none"> <li>- Definition of the risk control and management policy, including tax risks.</li> <li>- Supervision (at least annually) of the internal control and information management systems, to guarantee that the main risks are adequately identified, managed and disclosed.</li> </ul>
Audit and Risk Committee	<ul style="list-style-type: none"> <li>- Supervision of the effectiveness of the Company's internal control and risk control systems, including tax risks.</li> <li>- Supervision of the proper functioning of the Company's external and internal audit services, as well as the Group's regulatory compliance function.</li> </ul>
Internal Audit Department	<ul style="list-style-type: none"> <li>- Communication to senior management and the Board of Directors (through the Audit and Risk Committee) of the information that allows the organization's objectives to be met, including the analysis and assessment of the effectiveness of the risk assessment tasks that it performs.</li> <li>- Evaluation and proposals to improve the effectiveness of risk management, control and governance processes through the identification of key risks and controls.</li> </ul>

## 4.2. Business Conduct (2-24, 2-27)

Ethics, integrity and transparency are the three axes on which BME organizes its general principles of action. BME proves its commitment to these principles through compliance with its legal obligations, transparency and

independence in the operation and functioning of the financial markets in a **safe, reliable and quality digital environment**.

### a) Legal Compliance. (2-24, 2-27)

Since 2022, **BME has implemented the SIX Code of Conduct, which defines the values and principles on which the interactions between employees are based, as well as the interactions between employees and stakeholders**, such as clients and other commercial partners, shareholders and regulating authorities. Said Code establishes principles of action, including the promotion of stability and attractiveness of financial centers, compliance with the Law, reporting inappropriate conduct and penalties for breaches of the code of conduct.

Additionally, the SIX Code of Conduct defines employee communications about inappropriate behavior as an essential tool to report breaches in the workplace and thus protect the group from any risk. In this regard, the Code establishes different channels through which inappropriate conduct can be reported, such as the email address directed to the Regulatory Compliance department of the BME Group, through a face-to-face meeting with the Regulatory Compliance department or through the internal platform BME Integrity Line.

In 2023, BME adapted its internal complaints system to the formal and technical requirements of the Whistleblower Protection Law, creating the BME Information System (<https://www.bolsasymercados.es/esp/privacidad/Sistema-de-Informacion>) as a channel to report irregular or potentially inappropriate conduct, actions or omissions that could constitute breaches or from which indications of non-compliance could arise, under both the current applicable legislation and the internal regulations established at the SIX Group, as well as any form of discrimination or harassment in the workplace. This channel is available to employees, clients, suppliers and other interested parties who maintain a relationship with BME who detect conduct and non-compliance in a work or professional context.

In 2023, four complaints received through the Internal Complaints Channel of BME have been admitted for processing (one in 2022). In one of the complaints, part of the reported facts refers to the complaint received during 2022 that was processed and closed.

Additionally, in 2023, no communications related to cases of discrimination, harassment or violation of human rights were processed, nor were any cases of corruption, bribery and fraud processed in 2023 (2-26, 205-3). Likewise, in either 2023 or 2022, BME did not receive any fine or significant firm penalty for non-compliance with regulations related to economic aspects derived from its operations. (2-27)

In 2023, and progressing in its commitment to regulatory compliance, BME made the "Col Tool" conflict of interest tool of SIX available to its employees so that they can communicate gifts and invitations, as well as external functions or second jobs, in accordance with the obligations provided for in the corporate Directives on conflicts of interest.

Furthermore, BME has implemented a Criminal Risk Prevention Model that is developed through the Company's Principles for the prevention of criminal risks. This model has general preventive controls and specific controls aimed at preventing, managing and controlling hypothetical criminal risks that could occur within the framework of its activities, including specific controls aimed at mitigating conduct related to money laundering, and the financing of terrorism, fraud, corruption and bribery, as well as any other conduct that may constitute

To guarantee compliance with the Criminal Risk Prevention Model and monitor any issue related to fraud, corruption and bribery, BME has created the following bodies:

- **Criminal Prevention Committee:** body answerable to the Audit and Risk Committee, which has autonomous initiative and control powers. This Committee is entrusted with supervising the effectiveness of the internal controls implemented at the BME Group and of 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. In accordance with the Plan prepared in 2022, the controls included in the System have been assessed to verify that said controls are updated and are sufficient to mitigate criminal risks. The report was presented to the BME Crime Prevention Committee in June.
- **Audit and Risk Committee:** it is entrusted with supervising this System and submitting to the Board of Directors, for its approval, proposals to amend the Criminal Risk Prevention Manual, as well as with informing this body of actions initiated as a result of any infringement or non-compliance in criminal matters.
- **Company's Internal Audit Department:** it is in charge of periodically auditing those processes that may be affected by cases of corruption, bribery and fraud, as well as the fraud risks that the Board of Directors has identified.
- **Regulatory Compliance Department:** it is tasked with carrying out the annual evaluation of the Criminal Prevention System, periodically reporting its actions to the Criminal Prevention Committee, and with the operation of the established controls, to verify whether the established controls, measures and procedures are updated and are reasonably sufficient to mitigate criminal risks.

Likewise, to reinforce awareness throughout the year, online courses on the Code of Conduct, and on conflicts of interest and communication of self-employed operations were provided (95.5% attendance). In addition, in-person training has been carried out for team leaders on discrimination,

mobbing and sexual harassment in the workplace. Likewise, a criminal risk prevention course has been launched to explain the Group's model to all employees and raise their awareness of the existing risks and the measures to mitigate them.

### b) Transparency (2-26)

In line with the Company's values, BME is committed to transparency, both in the operations of the financial markets and at the level of disclosure of financial and non-financial information.

At operational level, **BME is committed to transparency, independent operations and free market rules**, as well as to market competition in a fair manner, and it undertakes not to carry out misleading or denigrating advertising of its competences or those of third parties. It should be noted that in 2023, BME was not affected by significant legal proceedings for unfair competition, monopolistic or anti-trust practices (206-1).

In this context, BME serves as a showcase for investors to have easy access to clear, reliable and immediate information and to make informed investment decisions, thus contributing to the stability of the economy.

Moreover, **BME is committed to transparency through the disclosure of financial and non-financial information**. In this regard, the Company publishes on its corporate website numerous reports, studies, articles and statistics related to the financial markets and even quotation reports that can be consulted daily. In relation to non-financial information, although BME is subject to Law 11/2018 by which it is obliged to publish this Non-Financial Information Statement, the Company began to voluntarily report its environmental, social and governance performance in 2008.

Regarding fiscal transparency (207-1 to 207-4) BME, in support of its general business strategy and the attainment of its corporate interests, complies with current regulations and its tax obligations with transparency, good faith and loyalty, and waives the performance of operations of an artificial nature, without a business motive arising from the Company's activity or in territories considered to be a tax haven, except those aimed at the direct performance of its business activities (207-1).

On September 30, 2010, BME complied with the Code of Best Tax Practices and, following up on its recommendations, approved tax policy principles in 2011, which were replaced by the tax strategy approved by BME in 2015, and implemented by the tax policies applicable to BME and the BME Group companies approved in this same financial year 2015.

By virtue of the Company's tax strategy, the Board of Directors, following a favorable report from the Audit and

Risk Committee, must approve the corporate operations which, if applicable, could materialize and which are considered significant by the Company given the special tax treatment they have, as is the case of the creation or acquisition of shares at special purpose entities or entities domiciled in countries or territories that are considered to be tax havens, as well as any transaction or operation of a similar nature that could undermine Group transparency.

### c) Cybersecurity

Continued technological progress represents a significant growth opportunity for BME, allowing it to discover new business opportunities and improve the quality and efficiency of its services. However, this progress also entails risks, and the Company recognizes the growing exposure to potential technological threats. Critical assets of BME, such as its operational facilities, data centers and the information associated with its services, along with the underlying computer systems, are safeguarded against any type of cyber risks. Cybersecurity, one of the vital pillars in the financial market management of BME, has become an

essential strategic component for the Company.

In collaboration with SIX, BME has implemented a comprehensive cybersecurity strategy to reinforce its posture in this regard, which ends in 2023. Consequently, this plan is being updated for the period 2024-2027 and aims to be more ambitious than the previous one to ensure the integrity of the Company's computer systems.

Additionally, throughout 2023, various initiatives were implemented in this regard:

- Project on digital operational resilience, which provides a regulatory framework to resist and recover from ICT-related shocks and threats, with uniform requirements across all EU Member States.
- Project to protect against potential ransomware and infrastructure recovery in seven days instead of thirty, the usual period.
- Project to outsource Data Centers to an external provider and improve their security and efficiency.
- Project for the migration of BME network systems into the SIX global network.

Also, within the framework of its Information Security Management System, BME implemented its Security Policy to protect information and computer systems from threats and risks of information leakages, such as cyberattacks, intrusions, fraud, sabotage, and industrial espionage.

In turn, the general principles and specific rules of use in the different services emanate from this Security Policy:

- **Software Security Policy:** enabling information and computer systems to be protected from threats and risks of information leaks such as intrusions, fraud, sabotage and industrial espionage, it is implemented through the Information Security Policy and the Ongoing Concern Policy:
  - **Information Security Policy:** its purpose is to prevent the abusive use of computer tools, through the identification of prohibited and permitted conduct, the consequences that may derive from their abusive use and the control procedures to be adopted by Company Management.
  - **Business Continuity Policy:** it includes the technical and organizational initiatives that make it possible to guarantee the operations of BME in the event of serious security incidents. Within the scope of the Business Continuity Policy, BME approved the Business Continuity Plan and the Reduced Business Continuity Plan. Likewise, the BME Group companies, Iberclear and BME Clearing have their own Business Continuity Policy.
- **Hardware Security Policy:** this policy is described in the Software Security Plan, which includes the physical security measures implemented by BME to protect the facilities, especially the area in which the data processing centers that house the computer equipment and the information processing and storage systems are located.

### d) Relations with the Public Administration (201-4, 415-1)

Considering the relevance of the operations carried out by BME for the correct functioning of the financial markets and, consequently, in the economic panorama of Spain, it is essential that the entity maintain fluid and constant communication with government entities. These interactions are structured through official channels and are based on strict compliance with current regulations, in addition to establishing links with the national and international media.

Based on the independence and transparency that characterize BME, the Company presents itself as an ally of the public administration when it comes to providing services and obtaining financing. In this regard, it is worth highlighting the collaboration that the Company has maintained with the different interlocutors and participants in the process for the approval of a new Securities Markets Law (LMV), a regulatory framework by which the activity of BME is governed, as market infrastructure and provider of financial services.

In recent years, BME has admitted to listing various green, social and sustainable bonds for entities such as the ICO, the Kingdom of Spain, the Basque Government or the

Community of Madrid, thanks to which they have been able to obtain financing linked to environmental, social and governance objectives.

Additionally, and as detailed in the environment chapter of this report, BME, through Iberclear, is responsible for the National Emission Rights Registry that supports the National Emission Rights Administrator.

In either 2023 or 2022, BME did not make any contribution to governments, political parties or organizations, thus maintaining management independence in its relations with government entities, at local, regional and national level.

On the other hand, BME **complies with the system established by the State Foundation for Employment Training, which makes financial aid available to all companies**, to train their employees, which is made effective by means of a bonus in the payment of Social Security contributions. BME received aid amounting to 22,567 euros in 2023.

# 5. Report Coverage (3-3)

## Scope of Information and Standards Used in the Report

This Consolidated Non-financial Information Statement, which forms part of the BME Group's 2023 Consolidated Management Report but is presented as a separate document, includes information relating to 2023 for all the activities and services provided by the Company, and has been prepared using as a reference the GRI Standards and Law 11/2018, of December 28, which modifies the Commercial Code, the consolidated Corporate Enterprises Act and the Audit Law, in matters of non-financial information and diversity. Where it has been considered

appropriate, information for 2022 has been included, to facilitate its comparability.

The structure and content of this report is based on the principles established by GRI for the preparation of sustainability reports (precision, balance, clarity, comparability, completeness, sustainability context, timeliness and verifiability) established by GRI to guarantee the quality of the information.

## Double Materiality Analysis (3-1, 3-2)

As established in the GRI Standards, and in line with the double materiality proposed by the European Financial Reporting Advisory Group (EFRAG), a first approach to double materiality was carried out in 2022, based on the guidelines available at that time. This document therefore contains information on the indicators for the aspects of sustainability that have been considered material from a dual perspective: the impact on the value of the company and the impact of the company on society and the environment.

As a result of the integration between BME and SIX, it has been considered appropriate to unify the relevant issues considered at both parent companies to address the most important issues for the Group in terms of sustainability from a common point of view. However, given the singularities of both companies, these issues have been granted particular

priority.

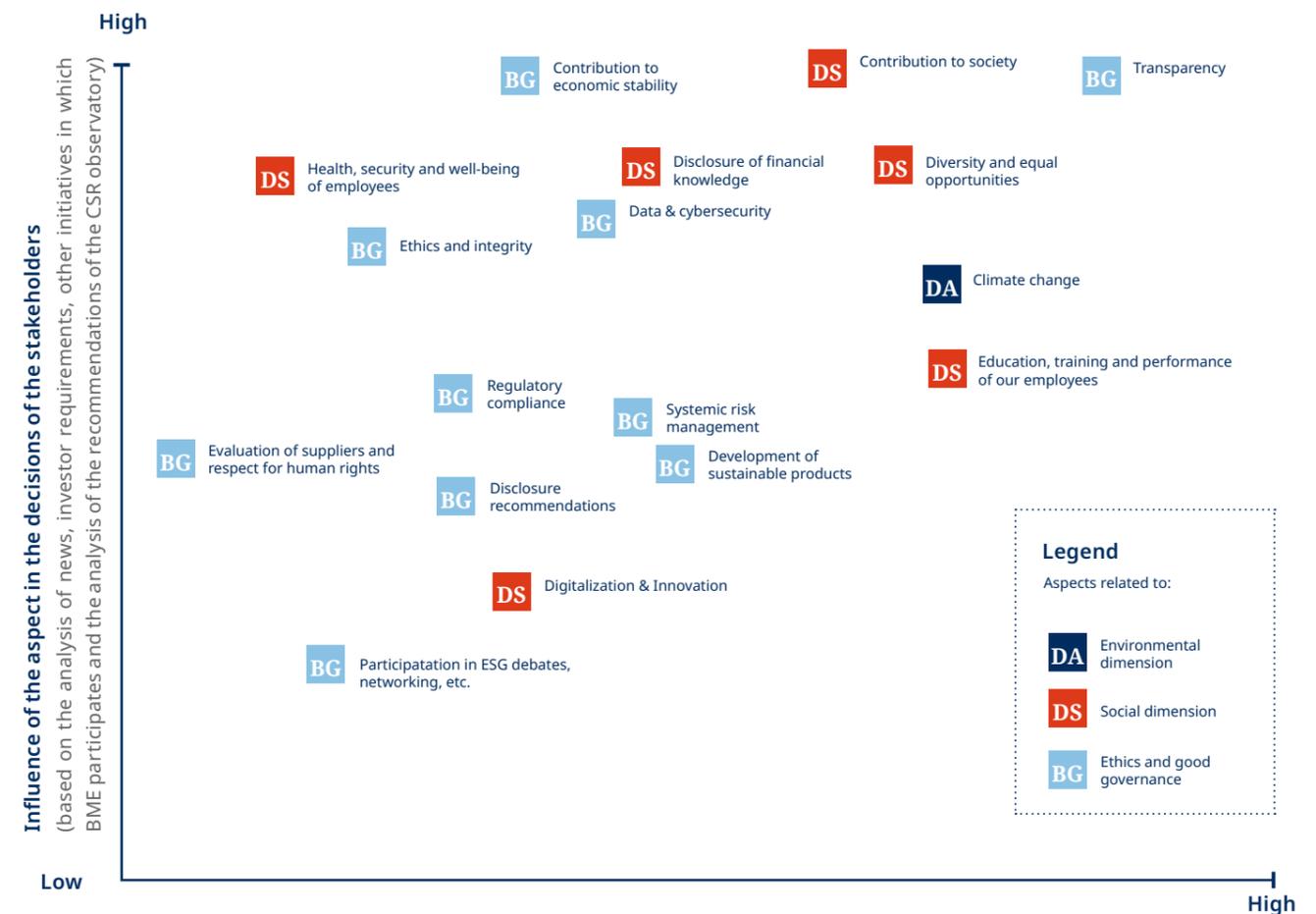
For more information about the double materiality analysis of SIX, see the Group's materiality matrix in its Annual Report.

As a consequence of the foregoing, in 2022 the materiality matrix was updated, modifying issues such as "Cybersecurity, digitalization and information privacy", which in 2023, were divided into "Data protection and cybersecurity" and "Digitalization and innovation" or the "Disclosure of financial knowledge", which was posted under "Contribution to society" in 2023. Likewise, new issues have been identified such as "Contribution to the stability of the economy", "Development of sustainable products", "Participation in ESG debates and networking" or "Reporting recommendations".

For the preparation of this double materiality analysis in 2022, the following activities were carried out:

- **Interviews with management:** to identify new significant topics for BME and SIX and prioritize existing relevant topics, interviews were conducted with the management of key areas at BME.
- **Surveys:** as a result of the previous year, a list was drawn up with relevant sustainability issues for BME and SIX to assign a score to each of them from the perspective of their impact on society and the environment (from inside to outside) and from the perspective of the impact on the value of the Company (from outside to inside).
- **SASB Five Factor:** for each of the material issues identified, an average enterprise value impact score (inside-out perspective) was assigned based on this SASB factor.

The result of these actions has allowed the preparation of the materiality matrix included below [\(3-2\)](#):



(based on internal interviews, analysis of sector reports and analysis of BME Corporate Policies)

**Impact of the aspect on the Company's ability to carry out its activities**

Once the material aspects have been identified, information to prepare the report has been collected based on interviews and the compilation of information from Company heads. With the data received and the context information obtained through the activities carried out in the materiality analysis, BME has prepared the final version of this report. In the GRI table of contents included in the last section, reference is made to the sections in which information related to of the indicators from said international framework can be found.

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

## Scope of the 2023 Consolidated Non-Financial Information Statement <sup>(2-2)</sup>

The 2023 consolidated non-financial information statement includes the data of the BME Group companies that consolidate financial statements using the global integration method, therefore the financial data of LATAM Exchanges Data México S.A. de C.V. are not included, which were consolidated using the equity method, as they are 49%

owned by BME Group companies.

The data on employees included in this Consolidated Non-Financial Information Statement refer to the BME Group's workforce.

## Point of Contact for Questions Regarding the Report <sup>(2-3)</sup>

If you would like any additional clarification on the information included in this document, or on the Company's

sustainability performance, you can contact BME at the following address: [info@grupobme.es](mailto:info@grupobme.es)

## Annex I. Additional Sustainability Information

### Distribution of Employees by Gender, Geographical Area, Age and Professional Category \*

#### Employee Workforce by Gender at December 31 of Each Year <sup>(2-7, 405-1)</sup>

	2022	2023
Women	326	335
Men	586	607
<b>Total</b>	<b>912</b>	<b>942</b>

#### Employees by Geographical Area and Gender at December 31 of Each Year <sup>(1)</sup> <sup>(2-7, 405-1)</sup>

	2022	2023
<b>Madrid (Spain)</b>	<b>754</b>	<b>827</b>
Women	270	298
Men	484	529
<b>Barcelona (Spain)</b>	<b>74</b>	<b>76</b>
Women	22	21
Men	52	55
<b>Bilbao (Spain)</b>	<b>25</b>	<b>21</b>
Women	10	9
Men	15	12
<b>Valencia (Spain)</b>	<b>53</b>	<b>13</b>
Women	22	5
Men	31	8
<b>Bogota (Colombia)</b>	<b>5</b>	<b>5</b>
Women	2	2
Men	3	3

*(1) In 2023, data was not reported for Miami as it is outside the scope. For comparative purposes in 2022, there was one employee in this geography.*

## Employees by Gender, Age and Professional Classification at December 31 of Each Year <sup>(405-1)</sup>

	2022			2023		
	Men	Women	Total	Men	Women	Total
<b>Chief Executive Officer</b>	1	0	<b>1</b>	1	0	<b>1</b>
Senior management	7	3	<b>10</b>	6	3	<b>9</b>
Middle management	41	25	<b>66</b>	39	25	<b>64</b>
Specialized staff	363	229	<b>592</b>	377	229	<b>606</b>
Administrative / Auxiliary / Support	174	69	<b>243</b>	185	78	<b>263</b>
< 30	80	37	<b>117</b>	85	36	<b>121</b>
30-50	336	188	<b>524</b>	342	191	<b>533</b>
> 50	170	101	<b>271</b>	180	108	<b>288</b>

(\*) HR quantitative data does not include employees of foreign REGIS-TR Group companies.

## Annual Average Contracts by Contract Type, Gender, Age and Professional Category <sup>(\*)</sup>

### Number of Employees by Contract Type <sup>(1) (2) (2-7)</sup>

	2022			2023		
	Men	Women	Total	Men	Women	Total
<b>Annual Average of Permanent Contracts by Gender, Age and Professional Classification</b>						
Senior management	7.00	2.17	<b>9.17</b>	6.50	3.00	<b>9.50</b>
Middle management	32.67	18.33	<b>51.00</b>	39.67	24.33	<b>64.00</b>
Specialized staff	293.83	192.75	<b>486.58</b>	356.92	220.67	<b>577.58</b>
Administrative / Auxiliary / Support	210.33	104.42	<b>314.75</b>	174.75	73.08	<b>247.83</b>
< 30	60.25	33.92	<b>94.17</b>	75.42	34.42	<b>109.83</b>
30-50	321.08	187.58	<b>508.67</b>	331.25	183.58	<b>514.83</b>
> 50	163.50	96.17	<b>259.67</b>	171.17	103.08	<b>274.25</b>
<b>Annual Average of Temporary Contracts by Gender, Age and Professional Classification</b>						
Senior management	0	0	<b>0</b>	0	0	<b>0</b>
Middle management	0	0	<b>0</b>	0	0	<b>0</b>
Specialized staff	0	0	<b>0</b>	0.25	0	<b>0.25</b>
Administrative / Auxiliary / Support	14.67	4.92	<b>19.58</b>	8.42	4.00	<b>12.42</b>
< 30	14.67	3.92	<b>18.58</b>	8.42	3.00	<b>11.42</b>
30-50	0	1.00	<b>1.00</b>	0.25	1.00	<b>1.25</b>
> 50	0	0	<b>0</b>	0	0	<b>0</b>

(1) Annual average contracts, both permanent and temporary, were calculated as the average of permanent/temporary contracts each month throughout each year.

(2) In 2023, there were no part-time workers and all full-time contracts were permanent.

(\*) HR quantitative data does not include employees of foreign REGIS-TR Group companies.

## Number of Contracts by Contract Type <sup>(\*)</sup>

### Permanent Employees by Contract Type <sup>(2-7)</sup>

	2022	2023
Full-time contract	912	942
Part-time contract	0	0
<b>Total</b>	<b>912</b>	<b>942</b>

## Number of in-House Employees, Subcontracted Workers and the Local Hiring of Employees <sup>(\*)</sup>

### Hired and Subcontracted Staff <sup>(2-8)</sup>

	2022	2023
Recruited employees	912	942
Subcontracted employees	240	301
Local hiring of employees and managers	100%	100%

## Number of Employees with Disabilities <sup>(\*)</sup>

### Employees with Disabilities <sup>(405-1)</sup>

Average Number of Employees with a Disability Greater or Equal to 33% <sup>(\*)</sup>

	2022	2023
Senior management	0	0
Middle management	0	0
Specialized staff	7	6
Administrative / Auxiliary / Support	2	1
<b>Total</b>	<b>9</b>	<b>7</b>
<b>Employees with Disabilities with a Permanent Contract</b>	<b>100%</b>	<b>100%</b>

(\*) All the BME Group and Openfinance companies, which have more than 50 employees, have certificates of exceptionality or comply with the content of Royal Legislative Decree 1/2013, of November 29, which approves the Consolidated General Law on the rights of people with disabilities and their social inclusion.

## Number of Employee Recruitments and Terminations by Gender, Age and Geographical Area. Hiring and Turnover Rates<sup>(\*)</sup>

### Employee Recruitments and Terminations by Gender

	Employee recruitments		Employee terminations	
	2022	2023	2022	2023
<b>Total</b>	<b>133</b>	<b>128</b>	<b>73</b>	<b>58</b>
<b>Gender Breakdown</b>				
Men	101	90	47	43
Women	32	38	26	15
<b>Breakdown by Age Group</b>				
< 30	43	11	21	18
30-50	84	115	37	25
> 50	6	2	15	15
<b>Breakdown by Geographical Area</b>				
Madrid (Spain)	128	117	62	46
Barcelona (Spain)	4	11	3	8
Bilbao (Spain)	0	0	0	4
Valencia (Spain)	1	0	8	0
Bogota (Colombia)	1	0	0	0

(\*) HR quantitative data does not include employees of foreign REGIS-TR Group companies.

(\*\*) For the preparation of this table, the effective date of the recruitments and terminations of employees at the corporate group companies has been taken into account. Movements between these companies do not consider recruitments or terminations.

### Recruitment Rate (%) <sup>(\*)</sup> (401-1)

	2022	2023
<b>Total Workforce</b>	<b>14.85%</b>	<b>13.59%</b>
<b>Gender Breakdown</b>		
Men	30.98%	14.83%
Women	5.46%	11.34%
<b>Breakdown by Age Group</b>		
< 30	36.75%	9.09%
30-50	16.03%	21.58%
> 50	2.21%	0.69%
<b>Breakdown by Geographical Area</b>		
Madrid (Spain)	16.98%	14.15%
Barcelona (Spain)	5.41%	14.47%
Bilbao (Spain)	0.00%	0.00%
Valencia (Spain)	1.89%	0.00%
Bogota (Colombia)	0.00%	0.00%

(\*) The turnover rate has been calculated according to the criteria of the GRI Standards: number of terminations among total staff at the end of the year.

### Turnover Rate (%) <sup>(\*)</sup> (401-1)

	2022	2023
<b>Total Workforce</b>	<b>8.00%</b>	<b>6.16%</b>
<b>Gender Breakdown</b>		
Men	14.42%	7.08%
Women	4.44%	4.48%
<b>Breakdown by Age Group</b>		
<30	17.95%	14.88%
30-50	7.06%	4.69%
>50	5.54%	5.21%
<b>Breakdown by Geographical Area</b>		
Madrid (Spain)	8.22%	5.56%
Barcelona (Spain)	4.05%	10.53%
Bilbao (Spain)	0.00%	19.05%
Valencia (Spain)	15.09%	0.00%
Bogota (Colombia)	0.00%	0.00%

(\*) The turnover rate has been calculated according to the criteria of the GRI Standards: number of terminations among total staff at the end of the year. The percentage of the turnover rate is reported, without detailing the total number of employees, considering that this data is more descriptive.

## Number of Layoffs<sup>(\*)</sup>

### Number of Layoffs <sup>(401-1)</sup>

	2022	2023
<b>By gender</b>		
Women	1	0
Men	1	6
<b>By age</b>		
< 30	0	2
30-50	1	2
> 50	1	2
<b>By professional classification</b>		
Senior management	0	0
Middle management	0	0
Specialized staff	2	2
Administrative / Auxiliary / Support	0	4

## Average Remuneration by Gender, Age and Professional Category<sup>(\*)</sup>

### Average Remuneration <sup>(\*)</sup> <sup>(405-2)</sup> (thousands of euros)

	2022	2023
<b>Breakdown by Gender</b>		
Men	70.86	70.82
Women	65.34	67.56
<b>Breakdown by Age Group</b>		
<30	36.61	40.29
30-50	60.54	63.06
>50	98.94	94.20
<b>Breakdown by Category</b>		
Senior management	394.63	387.30
Middle management	160.43	160.70
Specialized staff	63.39	66.78
Administrative / Auxiliary / Support	40.00	43.27

<sup>(\*)</sup> To calculate the average remuneration, the real remuneration received by the worker from BME has been taken into account (fixed remuneration, real variable received, which corresponds to that of the previous year, and remuneration in kind) and the number of days that they have belonged to the Company during the year. The number of employees considered is the total at the end of the year.

## Frequency Rate, Severity Rate, Days Missed, Days of Absenteeism and Occupational Disease Rate<sup>(\*)</sup>

### Frequency Rates. Severity Index. Rates of Professional Illnesses, Missed Days and Absenteeism <sup>(1) (2)</sup> <sup>(403-9)</sup>

	2023							
	Breakdown by region					Gender breakdown		
	Madrid	Barcelona	Bilbao	Valencia	Total	Men	Women	Total
Accident rate with injury (Frequency rate) <sup>(2)</sup>	3.45	0.00	0.00	0.00	<b>2.83</b>	3.58	1.55	<b>2.83</b>
Severity index	0.07	0.00	0.00	0.00	<b>0.06</b>	0.08	0.01	<b>0.06</b>
Occupational disease rate	0.00	0.00	0.00	0.00	<b>0.00</b>	0.00	0.00	<b>0.00</b>
Missed days rate <sup>(3)</sup>	6.82%	0.00%	0.00%	0.00%	<b>5.61%</b>	8.50%	0.62%	<b>5.61%</b>
Absenteeism	24,354	4,889	2,461	1,778	<b>33,482</b>	13,815	19,677	<b>33,482</b>
	1.68	3.35	4.90	1.53	<b>1.90</b>	1.24	3.04	<b>1.90</b>

	2023							
	Breakdown by region					Gender breakdown		
	Madrid	Barcelona	Bilbao	Valencia	Total	Men	Women	Total
Accident rate with injury (Frequency rate)	1.87	0.00	0.00	0.00	<b>1.65</b>	0.85	3.07	<b>1.65</b>
Severity index	0.01	0.00	0.00	0.01	<b>0.01</b>	0.00	0.00	<b>0.02</b>
Occupational disease rate	0.00	0.00	0.00	0.00	<b>0.00</b>	0.00	0.00	<b>0.00</b>
Missed days rate	0.87%	0.00%	0.00%	0.00%	<b>0.77%</b>	0.17%	1.84%	<b>0.77%</b>
Absenteeism	33,378	2,850	3,130	831	<b>40,190</b>	16,929	23,261	<b>40,190</b>
	2.08	1.91	7.40	3.23	<b>2.20</b>	1.44	3.57	<b>2.20</b>

<sup>(1)</sup> The calculation of these rates takes into account all those employees who, during the year, have belonged to the BME Group (data from employees of BME Latam SAS and LATAM Exchanges Data Inc. are not included as they are regulated by different legislation and are not material)

Likewise, the definitions considered to calculate the health and safety indices are those established according to the GRI Content Index:

-Accident: Fatal or non-fatal accidents that occurred during the course of work.

-Professional illness: Illness derived from a work situation or activity.

-Missed days: Time off of an employee due to an accident or occupational disease.

-Hours absenteeism: Number of hours a worker is absent from work due to disability of any kind, not just due to an occupational accident or illness.

Likewise, the formulas used to calculate the safety and health indices were as follows:

-Accident rate with injury (Frequency rate): Number of accidents x 10<sup>6</sup>/Total no. of scheduled work hours

-Severity index: Lost days x 10<sup>3</sup>/Total no. of scheduled work hours.

-Occupational disease rate: No. of occupational diseases x 10<sup>6</sup>/Total no. of scheduled work hours.

-Missed days rate: Lost days x 10<sup>5</sup>/Total no. of scheduled work hours.

-Absenteeism rate: Number of absenteeism hours x 10<sup>2</sup>/Total no. of scheduled work hours.

<sup>(2)</sup> There were 3 accidents at BME Group in 2023: 2 women and 1 man, all in Madrid

## Hours of Training by Gender and Professional Category. Average Hours of Training by Gender and Professional Category

### Employee Training (404-1) BME Group <sup>(1) (2)</sup>

BME GROUP (1) (2)	2022			2023		
	Men	Women	Total	Men	Women	Total
<b>Number of Hours of Employee Training (by Professional Category)</b>						
Senior management	19	37	55	0	80	80
Middle management	750	441	1,191	448	143	591
Specialized staff	12,242	7,113	19,356	7,520	4,702	12,223
Administrative / Auxiliary / Support	3,346	1,646	4,992	2,110	865	2,975
<b>Average Hours of Employee Training (by Professional Category)</b>						
h/employee - senior management	3	37	8	0	27	9
h/employee - middle management	22	21	22	11	6	9
h/employee - specialized staff	41	36	39	20	21	20
h/employee - administrative / auxiliary	24	25	24	11	11	11

(1) These figures include training derived from training actions generally applicable to BME Group employees, including language training and personalized or specific training.

(2) Average training hours have been calculated based on the number of training hours given to each employee, by professional category.

## Annex II. Index of Non-Financial Information Contents

BME has presented the information cited in this GRI content index for the period between January 1, 2023 and December 31, 2023 using the GRI Standards as a reference.

Law 11/2018, of December 28, on Non-financial Information	GRI Content Index	Description	Headings of This Report / Other Reports	Page/s
	GRI 1	Fundamentals 2021		
<b>Business Model</b>				
Description of the business model	2-6	Activities, value chain and other business relationships	1	8-11
Business environment	2-1	Organizational details	Front page	1
	2-1	Organizational details	1	8-11
Geographical presence and markets in which it operates	2-6	Activities, value chain and other business relationships	1	8-11
Organization and structure	2-6	Activities, value chain and other business relationships	Financial Statements	
			1 and 3.2	8-11, 36-38
Objectives and strategies	2-22	Sustainable Development Strategy Declaration	1.1	19
			Chief Executive Officer and President's Letter	
Main factors and trends that may affect its future performance	2-22	Sustainable Development Strategy Declaration	1.1	19
			Chief Executive Officer and President's Letter	7-10
<b>Group Policies and Their Results</b>				
Description of the policies applied by the Group and their results	2-23	Commitments and policies	1 and 4.1	8, 51
	2-24	Incorporation of commitments and policies	1 and 4.1	8, 51
<b>Short-, Medium- and Long-Term Risks</b>				
Short-, medium- and long-term risks	2-25	Processes to remedy negative impacts	Financial Statements	
			4	50
<b>Key Non-Financial Performance Indicators (KPIs)</b>				
Key non-financial performance indicators that are relevant to the specific business activity and meet the criteria of comparability, materiality, relevance and reliability	2-23	Commitments and policies	1 and 4.1	8, 51

Law 11/2018, of December 28, on Non-Financial Information	GRI Content Index	Description	Headings of This Report / Other Reports	Page/s
<b>I. Information on Environmental Matters</b>				
<b>Global Environment</b>				
Resources dedicated to the prevention of environmental risks	3-3	Management of material issues	2	25-26
	2-27	Compliance with laws and regulations	2, 3.1 and 4.1	25-26
Precautionary principle	3-3	Management of material issues	2	25-26
Current and foreseeable effects of the Company's activities on the environment and, where appropriate, health and safety	3-3	Management of material issues	2	25-26
	201-2	Financial consequences and other risks and opportunities for the organization due to climate change	2 Financial Statements	25-26
Amount of provisions and guarantees for environmental risks	3-3	Management of material issues	2	25-26
Environmental assessment or certification procedures	3-3	Management of material issues	2	25-26
<b>Pollution</b>				
Atmospheric pollution	3-3	Management of material issues	2	25
Light and noise pollution	Non-material indicator for the Group as can be seen from the materiality analysis			
Measures to prevent, reduce or repair carbon emissions	305-5	Reduction of GHG emissions	2.1	27
<b>Circular Economy and Waste Prevention and Management</b>				
Prevention measures, recycling, reuse, other forms of recovery and disposal of waste and actions to combat food waste.	Non-material indicator for the Group as can be seen from the materiality analysis			
<b>Sustainable Use of Resources</b>				
Water consumption	Non-material indicator for the Group as can be seen from the materiality analysis			
Raw material consumption	Non-material indicator for the Group as can be seen from the materiality analysis			
Direct and indirect energy consumption and measures taken to improve efficiency and use of renewable energy	3-3	Management of material issues	2	25
	302-1	Internal energy consumption	2.1	27
	302-2	External energy consumption	BME has not calculated the organization's external energy consumption.	
	302-3	Energy intensity	2.1	27
	302-4	Reduction of energy consumption	2.1	27
	302-5	Reduction of the energy requirements of products and services	2.1	27

Law 11/2018, of December 28, on Non-Financial Information	GRI Content Index	Description	Headings of This Report / Other Reports	Page/s
<b>Climate Change</b>				
Emissions of greenhouse gases	3-3	Management of material issues	2	25
	305-1	Direct GHG emissions (scope 1)	2.1	28
	305-2	Indirect GHG emissions when generating energy (scope 2).	2.1	28
	305-3	Other indirect GHG emissions (scope 3)	2.1	28
	305-5	Reduction of GHG emissions	2.1	28
Measures to adapt to the consequences of climate change	201-2	Financial consequences and other risks and opportunities for the organization due to climate change	Financial statements 2	25
	305-5	Reduction of GHG emissions	2.1	28
Reduction goals established voluntarily in the medium and long term to reduce greenhouse gas emissions	3-3	Management of material issues	2	25
Biodiversity protection	Non-material indicator for the Group as can be seen from the materiality analysis			
<b>II. Information on Social and Personnel Issues</b>				
<b>Employment</b>				
Total number and distribution of employees by gender, age, country and professional classification	2-7	Employees	Annex I 3.2	59-61 35
	2-8	Non-employee workers	Annex I	68
	405-1	Diversity in governance bodies and employees	4 and Annex I	47, 59-61
Total number and distribution of employment contract modalities	2-7	Employees	Annex I	59-61
Annual average contracts by contract type, broken down by gender, age and professional classification	2-7	Employees	Annex I	59-61
Employees with disabilities	405-1	Diversity in governance bodies and employees	4 and Annex I	47, 59-61
Number of dismissals by gender, age and professional classification	401-1	New employee hires and staff turnover	3.1 and Annex I	32 and 63
The average remuneration of directors and managers including variable remuneration, per diems, indemnities, payment to long-term savings pension systems and any other benefit, broken down by gender	2-19	Remuneration policies	Directors' remuneration policy 4	49
	2-20	Processes to determine remuneration	Directors' remuneration policy 3.1	31
			4	49
Average remuneration and its variations, broken down by gender, age and professional classification or equal value	405-2	Ratio of basic salary and remuneration of women compared to men	3.1	34
Wage gap			Annex I	64
Labor disconnection policies	3-3	Management of material issues	3.1	32

Law 11/2018, of December 28, on Non-Financial Information	GRI Content Index	Description	Headings of This Report / Other Reports	Page/s
<b>Work Organization</b>				
Mechanisms and procedures that the Company has to promote the involvement of workers in the management of the Company, in terms of information, consultation and participation	3-3	Management of material issues	3.1	35
Organization of working time and measures aimed at facilitating the enjoyment of a work-life balance	3-3	Management of material issues	3.1	35
	401-2	Fringe benefits for full-time employees that are not offered to temporary or part-time employees	3.1	32
Number of hours of absenteeism	403-9	Work accident injuries	Annex I	65
<b>Health and Security</b>				
Health and safety conditions at work	3-3	Management of material issues	3.1	34
	403-1	Occupational health and safety management system	3.1	34
	403-2	Hazard identification, risk assessment and accident investigation	3.1	34
	403-3	Occupational health services	3.1	34
	403-5	Training of workers on health and safety at work	3.1	35
	403-6	Promotion of occupational health	3.1	34
	403-7	Prevention and mitigation of impacts on the health and safety of workers directly linked through business relationships	3.1	34
Occupational accidents by gender and frequency and severity rates by gender	403-9	Work accident injuries	Annex I	65
Occupational diseases by gender	403-10	Occupational illnesses and diseases	The professions of BME workers do not have a high incidence or risk of disease 3.1	34
<b>Corporate Relationships</b>				
Organization of social dialogue, including procedures for informing, consulting and negotiating with staff	3-3	Management of material issues	BME guarantees all its workers the right to belong to labor unions freely for the promotion and defense of their economic and corporate interests. The union representative bodies of the workers and the technical committees derived from the Collective Bargaining 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 could be at risk	There are no significant centers or suppliers with a risk of infringement or threat to freedom of association and the right to benefit from collective bargaining agreements.	
Employees covered by collective bargaining agreements	2-30	Collective bargaining agreements	3.1	35

Law 11/2018, of December 28, on Non-Financial Information	GRI Content Index	Description	Headings of This Report / Other Reports	Page/s
Balance of collective bargaining agreements, in particular, in the field of health and safety at work	403-4	Worker participation, consultation and communication on health and safety at work	BME discusses at the Health and Safety Committees listed in section 3.1 of this report all the issues that it considers to be of significance in this area: among others, social security, occupational risk prevention, security measures and drills.	
Mechanisms and procedures that the Company has to promote the involvement of workers in the management of the Company, in terms of information, consultation and participation	2-30		3.1	35
<b>Training</b>				
Policies implemented	3-3	Management of material issues	3.1	31
	404-2	Programs to improve employee skills and transition assistance programs	3.1	31
Total number of training hours by professional category	404-1	Average hours of training per year per employee	3.1	31
			Annex I	66
<b>Universal Accessibility for People with Disabilities</b>				
Universal accessibility for people with disabilities	3-3	Management of material issues	3.1	33
<b>Equality</b>				
Measures adopted to promote equal treatment and opportunities between women and men	3-3	Management of material issues	3.1	25
Equality plans (Chapter III of Organic Law 3/2007, of March 22, for the effective equality of women and men), measures adopted to promote employment, protocols against sexual and gender-based harassment	3-3	Management of material issues	3.1	25
Universal integration and accessibility for people with disabilities	3-3	Management of material issues	3.1	25
Policy against all types of discrimination and in relation to diversity management	3-3	Management of material issues	3.1	25
<b>III. Information on Respect for Human Rights</b>				
Prevention of risks of breaching human rights and, where appropriate, measures to mitigate, manage and repair possible abuses committed	As established in its code of ethics, BME respects internationally recognized human rights and supports their compliance and encourages respect for these vital rights throughout its entire value creation chain. Likewise, the corporate risk management framework is presented as the Company's essential tool to prevent any risks in terms of human rights.			
Elimination of forced or compulsory labor	Non-material indicator for the Group as can be seen from the materiality analysis			
Effective abolition of child labor	Non-material indicator for the Group as can be seen from the materiality analysis			
Elimination of discrimination in employment and occupation	3-3	Management of material issues	3.1	33
	406-1	Cases of discrimination and corrective actions taken	3.1	34
Complaints arising from violations of human rights	406-1	Cases of discrimination and corrective actions taken	3.1	34
Promotion and compliance with the provisions of the essential Conventions of the International Labor Organization	407-1	Operations and suppliers whose right to freedom of association and collective bargaining could be at risk	There are no significant centers or suppliers with a risk of infringement or threat to freedom of association and the right to benefit from collective bargaining agreements.	
Due diligence procedures	2-23	Commitments and policies	1	8
	2-26	Mechanisms for seeking advice and raising concerns	4.2	52-53

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<b>IV. Information Related to the Fight against Corruption and Bribery</b>				
Measures adopted to prevent the fight against corruption and bribery	205-2	Communication and training on anti-corruption policies and procedures	4	48
	205-3	Confirmed cases of corruption and measures taken	4.2	52
Measures to combat money laundering	205-2	Communication and training on anti-corruption policies and procedures	4	48
Contributions to foundations and non-profit entities	413-1	Operations with local community participation, impact assessments and development programs	The percentage of operations is not reported as it is not available	
			3.3	43
<b>V. Information about the Company</b>				
<b>Company Commitment to Sustainable Development</b>				
Impact on employment and local development	3-3	Management of material issues	3.3	38
	203-1	Investments in infrastructures and supported services.	3.3	42
	203-2	Significant indirect economic impacts	3.3	42
	413-1	Operations with local community participation, impact assessments and development programs	The percentage of operations is not reported as it is not available 3.3	43
Impact on local populations and the territory	413-1	Operations with local community participation, impact assessments and development programs	3.3	43
	413-2	Operations with significant actual and potential negative impacts on society	3.3	38
Relations with society players	2-29	Approach to stakeholder engagement	BME bases the frequency of its relationship with its main stakeholders on its business's needs. With regard to the preparation of the report, BME has taken into account the main expectations mentioned by these stakeholders. For this, information and opinions have been requested from those responsible for the Company with who work has been performed to define the contents of the report.	
			1	16

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Association or sponsorship actions	2-28	Association membership	1	19
			3.3	44
<b>Subcontracting and Suppliers</b>				
Inclusion in the purchasing policy of social, gender equality and environmental issues	2.8	Management of material issues	3.2	35
			3.2 and Annex I	35 and 61
Supervision and audits	3-3	Management of material issues	3.2	35
			3.2	35
Consideration in relations with suppliers and subcontractors regarding their social and environmental responsibility	414-1	New suppliers that have passed selection filters according to social criteria	3.2	36-37
			204-1	37
<b>Consumers</b>				
Measures for the health and safety of consumers;	3-3	Management of material issues	3.4	45
Complaint systems, complaints received and their resolution.	3-3	Management of material issues		
<b>Tax Information</b>				
Profits obtained country by country and income tax	207-1	Tax approach	4.2	53
	207-2	Fiscal governance, control and risk management	Financial statements	
			The contents of the report respond to taxation opinions and concerns expressed by the stakeholders of BME as a result of the materiality analysis of BME, demonstrated through the compliance of the BME Group companies with the Code of Best Tax Practices that entails the defense of public policies in tax matters.	
207-3	Participation of stakeholders and management of tax concerns	Financial statements		
		207-4	Presentation of country-by-country reports	Financial statements
Public subsidies received	201-1	Direct economic value generated and distributed	1	14
			201-4	Financial aid received from governments

Law 11/2018, of December 28, on Non-Financial information	GRI Content Index	Description	Headings of This Report / Other Reports	Page/s	
<b>Other Significant Information</b>					
<b>Other Information about the Company</b>					
Other information about the Company profile	206-1	Legal actions related to unfair competition and monopolistic practices and against free competition	No lawsuits were filed for unfair competition and monopolistic and antitrust practices.		
			4.2	53	
	415-1	Contributions to political parties/ representatives		4.2	55
	418-1	Substantiated complaints regarding breaches of clients' privacy and the loss of client data	There have been no complaints regarding respect for privacy and the leakage of personal customer data.		
			Financial statements		
				2	25
	2-27	Compliance with laws and regulations		3.1	30
				3.1	34
				4.2	52
			3	39	
<b>Corporate Governance</b>					
Corporate governance	2-9	Governance structure and composition	4	47	
	2-13	Delegation of responsibility for managing impacts	4	47-48	
			4.1	50	
	2-11	Chairman of the highest governance body	4	47-48	
	2-10	Appointment and selection of the highest governance body			
	2-15	Conflicts of interest	Articles of association and internal enactment regulations		
	2-12	Role of the highest governance body in overseeing the management of impacts			
	2-17	Collective knowledge of the highest governance body	The directors of BME have received training in economic, social and environmental matters in the exercise of the functions that are theirs in the holding of the meetings of the Board of Directors and the Audit and Risk Committee on the occasion of the last materiality analysis of the 2022 carried out and the approval of this report.		
	2-18	Evaluation of the performance of the highest governance body	The Board of Directors annually evaluates the efficiency of its operations 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 December 28, on Non-Financial information	GRI Content Index	Description	Headings of This Report / Other Reports	Page/s	
Corporate governance	2-12	Role of the highest governance body in overseeing impact management	The 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.		
	2-14	Role of the highest governance body in the preparation of sustainability reports	The Board of Directors is the body that approves the Non-Financial Information Statement		
	2-16	Communication of critical concerns	Financial statements		16
				5	58
	2-2	Entities included in the presentation of sustainability reports	1	10	
<b>Participation of Stakeholders</b>					
Participation of stakeholders	2-12	Role of the highest governance body in overseeing impact management	The Board of Directors, through its Audit and Risk Committee, 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 their relationship with them.		
	2-29	Approach to stakeholder engagement	Stakeholders have been selected based on the criteria of their relevance to the Company and its activities.		
			1	16	
<b>Other Useful Information on the Preparation of the Document</b>					
Other useful information on the preparation of the document	3-1	Process for determining material issues	5	56	
	3-2	List of material topics	5	56-57	
	2-4	Update of information	Restatements of figures from the previous year are explained in a footnote		
	2-3	Reporting period, frequency and point of contact	2023		
			Annual		
				5	58
2-5	External verification	The Company has requested an independent review of the Consolidated Non-financial Information Statement with the scope indicated in its Verification Report			

(\*) GRI content index