ENVIRONMENTAL POLICY

INSTITUTO DE CRÉDITO OFICIAL (ICO)



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INTRODUCTION

ICO is a corporate State-owned entity whose purpose is sustaining and promoting economic activities that contribute to growth and improving the distribution of national wealth and, in particular, promoting those activities that merit promotion because of their social, cultural, innovative or ecological importance. ICO fulfils its mission in two capacities: as a national development bank, financing activities and projects that promote a strong, competitive and sustainable business sector; and as a state financial agency, managing funds, guarantees and financial instruments on behalf of the General State Administration to implement specific economic policy measures.

In this context, ICO considers that sustainability in its environmental, social or governance aspects is a basic guiding pillar of its activity, due to the growing interrelationship with its mission and objectives.

Due to its public nature and its vocation to serve society, ICO prioritises the financing of activities that have a positive impact on people, the climate and the environment, and considers that it plays an important role in the development and support of Spain's energy and climate policy.

Therefore, it approves this Environmental Policy, which defines ICO's commitment to managing and controlling its direct impacts on the environment and analysing and monitoring the indirect impacts generated from the financing of third-party activities and projects.

PURPOSE

This Environmental Policy establishes the guidelines and commitments to be followed for the control and management of direct and indirect environmental impacts generated in the development of ICO's activities, products and services.

SCOPE

The guidelines and commitments established in this policy are applicable to all ICO professionals within the scope of their powers and responsibilities. It also applies to professionals from service providers who carry out their tasks on ICO premises and to all those professionals who act in the name and on behalf of the Institute.

COMMITMENTS

ICO, as a signatory to the 10 Principles of the United Nations Global Compact and the Equator Principles, and in alignment with the 17 Sustainable Development Goals of the 2030 Agenda and the Paris Agreement on Climate Change (COP21), is committed to controlling and managing its direct and indirect environmental impacts:

- **Leadership**: ICO's Management approves this Environmental Policy and is committed to leading and promoting the implementation of and compliance with the commitments established herein. It is committed to defining objectives for improving environmental management, responsible use of resources and adaptation to climate change. It is also committed to approving the allocation of financial and non-financial resources necessary to achieve the objectives defined to improve environmental management.
- **Responsible and ethical management:** In matters relating to environmental management, ICO professionals must comply with the requirements set out in the Code of Ethics and Conduct.
- **Environmental impacts**: ICO is committed to identifying the environmental aspects inherent to its activity and evaluating the positive and negative impacts that they have on the environment.
- **Legal requirements and other requirements**: ICO is committed to strict compliance with current regulations, for which it will identify and evaluate compliance with the legislative and regulatory requirements that apply to it. Likewise, it is committed to identifying and evaluating compliance with the environmental requirements established by national and international initiatives to which it voluntarily adheres (Equator Principles, 10 Principles of the Global Compact, Paris Agreements, etc.).
- **Context:** ICO is committed to analysing the internal and external circumstances that influence its environmental impact, and which stakeholders interact with ICO in its environmental performance.
- **Risks and opportunities**: ICO is committed to identifying and evaluating the risks and opportunities that its activity and its products and services have on the environment. It is also committed to defining treatment plans for the risks and opportunities with the greatest impact on the environment. Environmental, social and governance risks are incorporated into ICO's Risk Map as part of the organisation's overall risk management framework.
- **Pollution:** ICO undertakes to calculate and have its carbon footprint verified annually, register it in the registry established under Royal Decree 214/2025, prepare and publish plans to reduce its carbon footprint, and implement preventive measures and, where greenhouse gas emissions have a significant environmental impact, corrective measures.

Similarly, ICO is committed to measuring and managing any other type of environmental pollution directly or indirectly derived from its activity.

- **Circular economy and waste prevention and management**: ICO is committed to implementing processes and tools to facilitate the sorting and management of waste generated in its facilities, and to raising awareness among its professionals so that waste sorting practices become part of their daily lives. ICO is committed to studying and formalising agreements that promote circular economy practices for the reuse of waste.
- **Environmental protection and pollution prevention:** ICO is committed to implementing the processes and tools necessary to protect the environment and prevent pollution, and to raising awareness among its professionals and its supply chain.
- **Sustainable consumption of natural resources**: ICO is committed to implementing practices for the sustainable and responsible consumption of natural resources, and to defining energy efficiency and improvement plans.
- **Training and awareness**: ICO is committed to defining training, information and communication actions to improve its professionals' environmental management.
- **Suppliers and supply chain**: ICO is committed to including environmental requirements in the processes for contracting goods and services, provided that they comply with the legal requirements established in the Law on Public Sector Contracts.
- **Activity:** ICO is committed to integrating environmental variables in the study and development of financial products, favouring activities and projects that improve environmental performance. In the same way, for all its activity, direct financing, financial intermediation lines, fundraising and venture capital activity, ICO will assess the applicable environmental policies and practices, excluding activities that generate negative impacts on the environment, and those in which the developer does not adopt the necessary measures for their adequate management and mitigation.

  ICO is committed to valuing environmental aspects in the formalisation of its loans, and transferring the principles and values of respect for the surroundings and the environment to the companies that are financed through the products marketed by ICO. As a mediator of financing lines, ICO will strengthen partnerships with financial institutions to transfer and promote these values to the organisation and management of SMEs and self-employed entrepreneurs.
- **Monitoring:** ICO is committed to defining a set of environmental indicators that make it possible to evaluate the management, control and improvement of environmental impacts, as well as to monitor the environmental objectives approved by Management.
- **Performance evaluation**: ICO is committed to establishing the internal processes and procedures necessary to monitor, analyse and evaluate environmental management.

- **Review and continuous improvement**: ICO's management undertakes to review periodically the adequacy of this policy, compliance with the commitments defined herein, and the degree to which the defined objectives are met. It also undertakes to continuously improve its Integrated Management System with a view to enhancing environmental performance, and to adopt the measures necessary to ensure effective environmental management.

ENVIRONMENTAL MANAGEMENT SYSTEM

To manage, monitor and follow up on the commitments set out in this Environmental Policy, ICO has an Environmental Management System in place that complies with the international standard ISO 14001, and that is integrated with the quality and occupational health and safety management systems within ICO's Integrated Management System.

Said environmental management system will be subject to verification by a certification body accredited by the *Entidad Nacional de Acreditación* (National Accreditation Entity - ENAC).

PUBLICATION

ICO will publicise its Environmental Policy by publishing it on the intranet and on its external website (www.ico.es), and will communicate it to all its staff to ensure it is correctly understood and implemented.

ENTRY INTO FORCE

The Environmental Policy enters into force on the date of its approval by the Management (Operations Committee).



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