

Disclosure under Article 5 of the Sustainable Finance Disclosure Regulation (EU) 2019/2088

Article 5 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“SFDR”) requires financial market participants and financial advisors to include in their remuneration policies information on how these policies are consistent with the integration of sustainability risks, and to make this information publicly available on their websites.

Bankinter Luxembourg S.A. (“the Bank”) is committed to maintaining a solid capital and liquidity base by applying a prudent approach to risk, aligned with its long-term strategy and business objectives.

In line with the Bankinter Group’s remuneration policy, the Bank’s remuneration framework promotes sound and effective risk management, including the management of sustainability risks, and ensures that remuneration structures do not encourage excessive or imprudent risk-taking.

As a general principle, variable remuneration is only awarded when it is sustainable considering the overall financial situation of the entity. Variable remuneration must not represent a significant proportion compared to fixed remuneration and must never jeopardise the Bank’s solvency or long-term sustainability. It reflects sustainable, risk-adjusted performance that exceeds the expectations defined in the job description, is aligned with the Bank’s business strategy, objectives, values and long-term interests, and incorporates measures to prevent conflicts of interest.

Within the Bankinter Group, variable remuneration for categories of staff whose professional activities have a material impact on the Bank’s risk profile (“identified staff”), is adjusted, among other elements, on the basis of both financial and non-financial metrics set out in the Group’s Risk Appetite Framework (“RAF”). These metrics capture the most significant risks faced by the entity, including environmental, social and governance (“ESG”) risks.