

# Consolidated Non-financial Information Statement 2024



**Independent Limited Assurance Report on the Consolidated  
Non-Financial Information Statement for the year ended  
December 31, 2024**

**BOLSAS Y MERCADOS ESPAÑÓLES, SOCIEDAD HOLDING DE  
MERCADOS Y SISTEMAS FINANCIEROS, S.A. - SINGLE SHAREHOLDER  
ENTITY AND SUBSIDIARIES**



Building a better  
working world

Ernst & Young, S.L.  
C/ Raimundo Fernández Villaverde, 65  
28003 Madrid

Tel: 902 365 456  
Fax: 915 727 238  
ey.com

## **INDEPENDENT LIMITED ASSURANCE REPORT ON THE CONSOLIDATED NON-FINANCIAL INFORMATION STATEMENT**

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

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

Pursuant to Article 49 of the Spanish Code of Commerce, we have performed a verification, with a limited assurance scope, of the accompanying Consolidated Non-Financial Information Statement (hereinafter, NFS) for the year ended December 31, 2024, of Bolsas y Mercados Españoles Sociedad Holding de Mercados y Sistemas Financieros, S.A. - Single Shareholder (hereinafter, the "Parent Company") and subsidiaries (hereinafter, the "Group"), which is part of the Group's Consolidated Management Report for the year 2024.

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

---

### **Responsibility of the Board of Directors**

The preparation of the Consolidated NFS included in the Consolidated Management Report of the Group and its content, is the responsibility of the Board of Directors of the Parent Company. The Consolidated NFS has been prepared in accordance with prevailing mercantile regulations and following, as reference, the criteria of the Sustainability Reporting Standards of the Global Reporting Initiative (GRI standards) selected, in accordance with that described for each subject area in the table of Annex II "Index of Non-Financial information contents", of the aforementioned accompanying Consolidated NFS.

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

They are further responsible for defining, implementing, adapting and maintaining the management systems from which the information necessary for the preparation of the Consolidated NFS is obtained.

---

### **Our independence and quality management**

We have complied with independence and other ethical requirements of the International Code of Ethics for Accounting Professionals (including international independence standards) issued by the International Ethics Standards Board for Accountants (IESBA), which is based on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour.

Our Firm applies International Standard on Quality Management 1 (ISQM 1), which requires us to design, implement and operate a system of quality management including policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

The engagement team consisted of experts in the review of non-financial information and, specifically, information on economic, social, and environmental performance.

---

### **Our responsibility**

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

The procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained is substantially lower.

Our work consisted in making enquiries of Management and the various Group units participating in the preparation of the Consolidated NFS, reviewing the processes for gathering and validating the information included in the Consolidated NFS, and applying certain analytical procedures and selective tests by means of sampling as described below:

- ▶ Meeting with Group personnel to obtain an understanding of the business model, policies and management approaches applied, the main risks related to these matters and obtain the necessary information for our external review.
- ▶ Analysis of the scope, relevance and integrity of the content included in the Consolidated NFS for the year 2024 based on the materiality analysis made by SIX (Parent Company's parent company) and described in section 1 "Report coverage - Double materiality analysis", considering the contents required by prevailing mercantile regulations.
- ▶ Analysis the processes for gathering and validating the data included in the 2024 Consolidated NFS.
- ▶ Review of the information on the risks, policies and management approaches applied in relation to the material aspects included in the 2024 Consolidated NFS.
- ▶ Check, through tests, based on a selection of a sample, the information related to the content of the 2024 Consolidated NFS and its correct compilation from the data provided by the sources of information.
- ▶ Obtaining a representation letter from the Board of Directors and Management.

---

## Conclusion

Based on the limited assurance procedures conducted and the evidence obtained, nothing has come to our attention that causes us to believe that Consolidated NFS of Bolsas y Mercados Españoles Sociedad Holding de Mercados y Sistemas Financieros, S.A. - Single Shareholder and subsidiaries for the year ended December 31, 2024 has not been prepared, in all material respects, in accordance with the contents required by prevailing mercantile regulations and following, as reference, the criteria of the selected GRI standards, described as explained for each subject matter in the table of Annex II "Index of Non-Financial information contents", of the aforementioned Consolidated NFS.

---

## Use and distribution

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

ERNST & YOUNG, S.L.

(Signed on the original version in Spanish)

---

Jaume Pallerols Cat

March 6, 2025

**CONTENTS**

<b>Chairman's Letter.</b>	<b>4</b>
<b>1. REPORT COVERAGE</b>	<b>6</b>
<b>2. GENERAL INFORMATION ON BME</b>	<b>10</b>
2.1 Sustainability strategy	22
2.2 Contribution of BME to sustainable finance	23
<b>3. ENVIRONMENTAL PROTECTION COMMITMENT</b>	<b>28</b>
3.1 Net Zero Strategy	29
3.2 Other natural resources	34
<b>4. SOCIAL CONTRIBUTION OF BME</b>	<b>36</b>
4.1 Commitment to our human capital	36
4.2 Workers in the value chain	43
4.3 Relationship with the community	45
4.4 Clients and end users	54
<b>5. RESPONSIBLE GOVERNANCE</b>	<b>55</b>
5.1 Risk Management Framework	59
5.2 Business conduct	62
<b>Annex I. Additional sustainability information</b>	<b>66</b>
<b>Annex II. Index of Non-Financial Information Contents</b>	<b>74</b>

## Chairman's Letter (2-22)

Dear reader,

I am pleased to present the Consolidated Non-Financial Information Statement for BME for 2024 in which we outline the company's commitment to transparency and responsible business conduct. In the following pages of this Report, you will be able to assess the progress made in terms of sustainability, as the only way of improving is to measure and set new objectives to work on.

BME is the manager of Spanish market infrastructures and since 2020 has formed part of SIX. It signed up to the Code of Best Tax Practices in 2010 and has been a collaborating entity of the UN Global Compact since 2011. Its activity is aligned with 9 of the 17 Sustainable Development Goals set out in the UN's 2030 Agenda (SDG 1, 3, 4, 5, 7, 8, 9, 13 and 17).

As part of its daily operations, the company contributes to economic stability by channeling financing into the system through the products and services it offers throughout the entire value chain, with a particular focus on smaller companies. During the year, financing raised on BME markets has injected capital flows of 9,963 million euros into the economy, which is in addition to 376,796 million euros in fixed-income financing, divided into 284,615 million euros of public debt and 92,181 million euros of corporate debt instruments. It also develops and admits sustainability-linked financial assets to trading, such as ESG indices and bonds. This year, a **new segment was launched in the BME Growth market for SMEs dedicated to SOCIMIs with social impact**, boasting reduced rates. **Support for financial education** also forms part of the DNA of SIX, sponsoring different initiatives aimed at improving citizens' economic culture.

As a company, it complies with governance standards, invests in data and cybersecurity and supports the transition to a low-carbon economy, with **a roadmap to achieve the goal of net zero emissions in 2050** at the group level. At the same time, it guarantees its employees an inclusive and equitable environment based on diversity and equal opportunities, and promotes the development of the local community through its relationship with suppliers.

The notable milestones of the year in the field of sustainability include the preparation and disclosure of the **"White Paper to promote the competitiveness of the Spanish capital markets"**, for which information was gathered on the options of listed companies, institutions and investors. The document includes 56 strategic measures in the legal, fiscal and regulatory field to promote the activity and size of the markets, under the premise that the strongest and most resilient economies are those that have the most robust markets.

Also worth note is the preparation of a **new double materiality analysis** in relation to the parent company, SIX, following the European Sustainability Reporting Standards (ESRS), which has been assimilated to BME. To this end, there was active participation in the preparation process, ensuring the alignment and representativeness of the company in the Group through the representation of the different stakeholders consulted.

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)<sup>1</sup> standards and Law 11/2018 of December 28, as a reference, is in the adaptation phase to the new CSRD regulations<sup>2</sup>. Its objective is to present the impact of BME Group activities and those of its companies in terms of sustainability. The contents of this Report have been prepared following a materiality analysis, the double materiality analysis prepared by SIX and adopted by BME.

Sincerely,

*Jos Dijsselhof*

- 1 *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.*
- 2 *The "Corporate Sustainability Reporting Directive" (CSRD) is an EU Directive that imposes new sustainability reporting obligations on companies. The aim of this is to improve the transparency and comparability of information on environmental, social and governance (ESG) aspects. The CSRD establishes stricter standards to promote a more sustainable economy.*



**Jos Dijsselhof. Chairman of BME\***

*\* Jos Dijsselhof cesó en su cargo como consejero delegado de SIX con fecha 1 de enero 2025*



# 1. Report coverage

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

## Scope of information and standards used in the report

This consolidated non-financial information statement, which forms part of the 2024 BME Group Consolidated Management Report, but is presented as an independent document, contains data corresponding to year 2024 for all the Company's activities and services. It has been prepared using the GRI Standards and Law 11/2018 of December 28 as a reference; said Law amended the Code of Commerce, the consolidated text of the Capital Companies Law and the Account Audit Law in terms of non-financial information

and diversity. To facilitate comparability, where considered relevant, information for 2023 has also been included.

The structure and content of this report follow the principles established by GRI for the preparation of sustainability reports, ensuring the quality of information by applying criteria of precision, balance, clarity, comparability, completeness, sustainability context, timeliness and verifiability.

## Double materiality analysis

Since 2021, SIX has been working on an internal project for company-wide sustainability reporting, with the aim of complying with the corresponding standards and regulations on this matter. All internal stakeholders whose governance areas, processes or key performance indicators are affected by the new disclosure regulations participated in this project.

As a result of the merger of BME into SIX, BME has adopted the same approach as part of its project, considering the same relevant sustainability issues addressed in the SIX report. With this in mind, the aim is to address the most important issues in terms of sustainability for the Group, from a combined perspective.

In 2024, SIX updated the Double Materiality Assessment (DMA) in line with the ESRS guidelines and following the EFRAG IG 1 Materiality Assessment Implementation Guide. The first step of this analysis aimed to identify the material matters and, consequently, the areas in which SIX has or could have impacts, risks and opportunities.

This process culminated in the development of a new Double Materiality Matrix that encompasses two scopes:

- **Impact materiality**, reflecting the impacts of SIX on people and/or the environment.
- **Financial materiality**, which addresses financial risks and/or opportunities at SIX in relation to its sustainability matters.

Based on these scopes, a comprehensive list of topics was drawn up using the GRI-based materiality matrix, market standards and other relevant sources such as the United Nations Global Compact and the World Federation of Exchanges (WFE). This list was shared for consultation with stakeholders as part of an online survey, allowing participants to rate the relevance of each topic on a scale of 1 to 5 from both perspectives: impact and financial materiality.

In total, more than 150 stakeholders were consulted, with a response rate of 54%. To achieve balanced participation, stakeholder groups were mapped in collaboration with relevant experts in the matter (SMEs), following a pre-established engagement strategy. Key considerations included diversity, inclusion and equity, with a focus on representing a broad spectrum of age groups, positions, gender, geographic locations and stakeholders. The aim of the process was to reflect the structure of the SIX Group and involve a wide spectrum of internal and external stakeholders, including: employees, society, customers, suppliers, policymakers, regulators and supervisors, investors and shareholders.

By defining a specific number of representatives, all points of view were duly taken into consideration, allowing for balanced decision-making. This approach also considered relevant factors such as the availability of resources of both SIX and stakeholders during the assessment period. To include an internal perspective, the list of topics was consulted with senior management at SIX through a series of direct interviews.

The final list of material issues reflects the combined perspectives of internal and external stakeholders. Notably, there was a difference in the approach to carbon emissions and reduction strategies, which were classed as material by SIX management, although not by external stakeholders in general. The assessment also gave consideration to differences within the SIX Group, including issues that BME, as a subsidiary Group, classified as a priority for inclusion at a SIX Group level.

The initial assessment confirmed the relevance of the most important themes highlighted in previous sustainability reports. A total of eight material issues were identified, of which six were considered doubly material from a financial and impact perspective. No matter was identified as solely a material issue from a financial perspective.

Material aspect	Standard	Materiality	
		Impact	Financial
Employees and work centers	ESRS S1 Own staff	✓	✓
Data and cybersecurity	ESRS S4 Consumers and end users	✓	✓
Responsible governance	ESRS G1 Business conduct	✓	✓
ESG data, services and solutions	Specific to the organization	✓	✓
Support for SMEs and startups	Specific to the organization	✓	✓
Contribution to economic stability	Specific to the organization	✓	✓
Climate change	ESRS E1 Climate change	✓	
Financial education	Specific to the organization	✓	



- **1. Employees and the workplace:** SIX as an attractive employer
- **2. Data and cybersecurity:** SIX as a good corporate citizen.
- **3. Responsible governance:** SIX as a good corporate citizen.
- **4. ESG solutions, services and products:** SIX as an ESG products, services and data provider
- **5. Support for SMEs and startups:** SIX as a financial market infrastructure provider
- **6. Contribution to a stable economy:** SIX as a financial market infrastructure provider
- **7. Climate change:** SIX as a good corporate citizen.
- **8. Financial education:** SIX as a good corporate citizen.

Several issues have been consolidated when compared to the previous SIX materiality matrix. In line with the structure of ESRS topics and sub-topics, human resources-related topics such as **“talent acquisition and retention”, “awareness raising, training and development of our employees”, “employee health, safety and well-being” and “diversity and equal opportunities”** have been combined into a single area under **“employees and the workplace”** (ESRS 1 “Own Staff”). **“Digitalization and innovation”** has been removed as a stand-alone topic, as it is now included in the **“contribution to a stable economy”** topics, as well as the topics related to **“data, service and ESG solutions”** and **“support for SMEs and emerging companies”** products. As part of its new double materiality matrix, SIX has also decided to move away from the prioritization of topics.

## Analysis of Impacts, Risks and Opportunities

During the second step of the assessment process, a detailed analysis of the impacts, risks and opportunities (IROs) was performed for each of the material issues identified. This analysis was carried out with the support of 26 internal experts on the matter, from different departments, in the form of a series of workshops and consultations dedicated to each material topic. The analyses encompassed all SIX regions and commercial relations.

As part of the impact assessment, a scale of assessment and decision thresholds was established, considering severity factors (scale, scope, irreversibility) and the impact probability. Actual impacts were considered material if they scored four or more on a scale of one to five, or if any individual factor was rated as critical (5 on a scale of 1 to 5). Specifically for human rights-related impacts, severity was rated as overwhelmingly likely. Potential impacts must also have a medium or high probability (2 or 3 on a scale of 1 to 3) to be considered material.

Risks were assessed using the internal risk inventory at SIX, which is updated and approved on an annual basis by the Board of Directors. Inherent risks classified as high in the risk materiality matrix were considered material. Current material risks are subject to risk management activities (1LoD and 2LoD) as well as specific controls, measures, indicators and a risk appetite. Anticipated risks related to

the eight material topics are derived from an annual internal assessment of emerging risks, encompassing technological; political and economic; regulatory and legal; environmental and social areas. At SIX, emerging risks are understood as being new or known in a new or unknown context, or under new contextual conditions. Emerging risks are potentially significant issues, but which may not yet be fully understood or assessed. The scope of emerging risks generally goes beyond that of a single subsidiary, and the time horizon is typically longer than the company's strategic cycle and its strategic risks. Where applicable, the time horizon of anticipated risks is described in the IRO table overview.

To evaluate current and future opportunities, the key points taken into consideration were time horizon and magnitude. In terms of time horizon, short and medium-term opportunities have been considered important. Magnitude has been weighted applying business thresholds, in relation to which high or medium factors have been considered significant.

The list of IROs was reviewed by the Internal Sustainability Parent Organization and included in the general strategy. The assessment, material issues and complete list of IROs were subsequently reviewed and validated by the project's internal governance bodies, including the Management Committee and the business owners at SIX.

## Scope of the 2024 consolidated non-financial information statement

(2-2, 2-3)

The 2024 consolidated non-financial information statement includes the data for BME Group companies that consolidate their financial statements applying the full consolidation method. Consequently, as was the case in 2023, the financial data for LATAM Exchanges Data México S.A. de C.V. is not included, as this company is consolidated using the equity method, as the BME Group holds a 49% stake in said company. This year, an investment was made in Openbrick, which acquired a 22.63% holding, which qualifies it as an

associate that will be consolidated using the equity method in the 2024 financial statements.

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

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)

# 2. General information on BME

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

Bolsas y Mercados Españoles Sociedad Holding de Mercados y Sistemas Financieros (hereinafter, BME), part of the SIX Group (SIX EXchange Group, 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 thanks to their solvency, efficiency and profitability. BME offers a wide range of products, services and trading systems based on stable and advanced technology developed in-house. It also offers access to global markets to issuers, intermediaries and investors both in Spain and abroad.

One of the company's strengths lies in 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: Exchanges (Equity, Fixed Income, Derivatives and Market Data), Securities Services (Clearing and Settlement) and Financial Information. (2-1)

## Main strengths of BME



BME is also committed to setting the benchmark for the economy of Spanish and Latin American companies through Latibex, which operates in the Latin American market in

euros. Through Latibex, BME provides visibility and prestige to these companies, as well as a stable market for their financing



## MISSION AND OBJECTIVES

**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 solid business model of BME, adapting it to the new environment, and customer equity.



## DIFFERENTIAL VALUES

**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 for BME in 2024 <sup>(2-6)</sup>

**521 million euros<sup>3</sup> (+5% vs 2023)**

Economic valuation of the Company

**0.69 tCO<sub>2</sub> (-91% vs 2023 on account of the purchase of renewable energy)**

Scope 2 emissions

**1,033 employees (10% vs 2023)**

Total workforce

**262.3 million euros (+7% vs 2023)**

Economic value distributed to stakeholders

**2 million euros (+12% vs 2023)**

Sustainability-related investments<sup>4</sup>

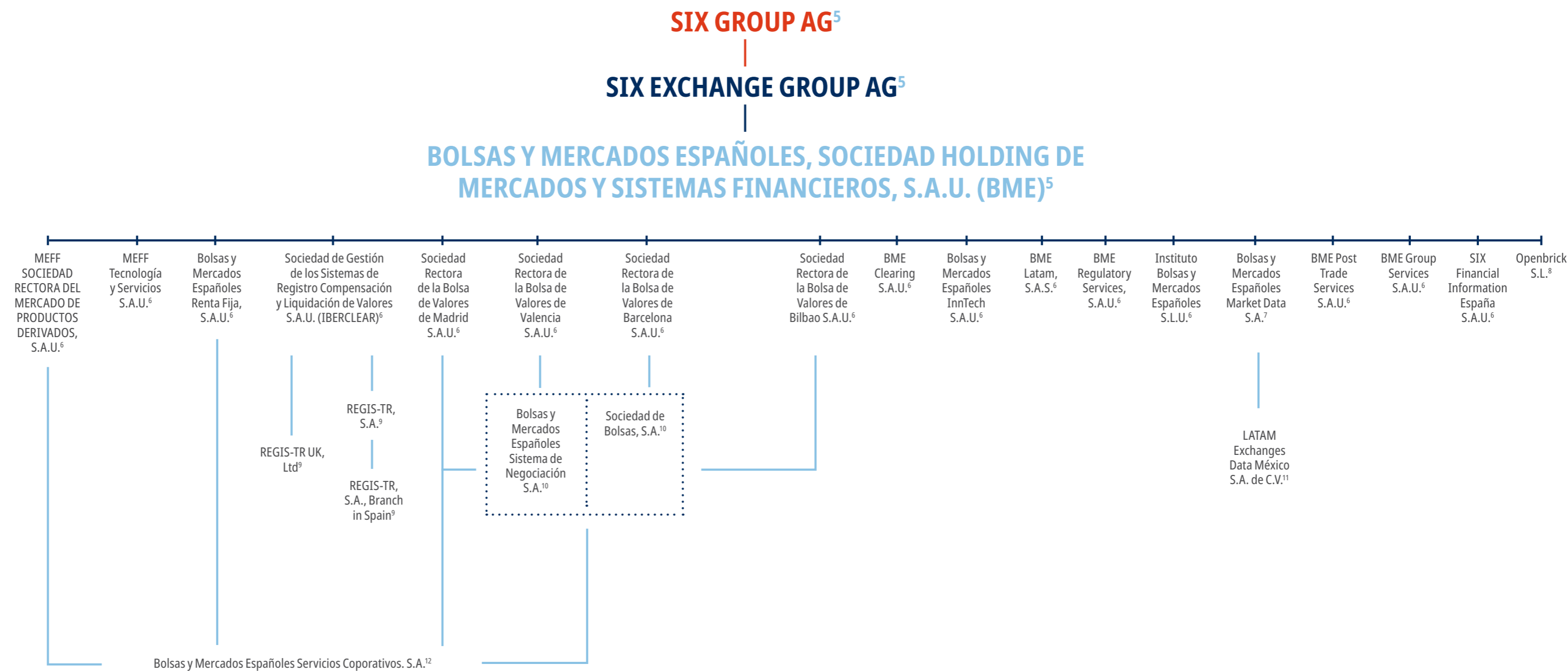
**37.14% (-1% vs 2023)** of senior

management and middle management are female

<sup>3</sup> The economic valuation of the company is the Group's equity.

<sup>4</sup> Includes the investment by BME 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)



5 SIX GROUP AG holds a 100% stake in the share capital of SIX EXCHANGE GROUP AG. SIX EXCHANGE GROUP AG also holds a 100% stake in the share capital of BME.

6 BME holds a 100% stake in the share capital of MEFF Sociedad Rectora del Mercado de Productos Derivados, S.A.U., MEFF Tecnología y Servicios, S.A.U., Bolsas y Mercados Españoles Renta Fija, S.A.U., IBERCLEAR, Sociedad Rectora de la Bolsa de Valores de Madrid, S.A.U., Sociedad Rectora de la Bolsa de Valores

de Valencia, S.A.U., Sociedad Rectora de la Bolsa de Valores de Barcelona, S.A.U., Sociedad Rectora de la Bolsa de Valores de Bilbao, S.A.U., BME Clearing, S.A.U., Bolsas y Mercados Españoles InnTech, S.A.U., BME Latam SAS, BME Regulatory Services, S.A.U., Instituto Bolsas y Mercados Españoles, S.L.U., BME Post Trade Services, S.A.U., Bolsas y Mercados Españoles Group Services, S.A.U. and SIX Financial Information España, S.A.U.

7 BME, MEFF Sociedad Rectora del Mercado de

Productos Derivados, S.A.U., Bolsas y Mercados Españoles Renta Fija, S.A.U., Sociedad Rectora de la Bolsa de Valores de Madrid, S.A.U., Sociedad Rectora de la Bolsa de Valores de Barcelona, S.A.U., Sociedad Rectora de la Bolsa de Valores de Bilbao, S.A.U., Sociedad Rectora de la Bolsa de Valores de Valencia, S.A.U. and Sociedad de Bolsas, S.A., respectively, hold a participation of 49.71 percent, 7.77 percent, 0.14 percent, 10.09 percent, 9.93 percent, 9.93 percent, 9.93 percent and 2.5 percent of the share capital of Bolsas y Mercados Españoles Market Data, S.A.

8 BME holds a participation of 22.63 percent in the share capital of Openbrick, S.L. and is represented on its Board of Directors by one director.

9 IBERCLEAR holds a 100% stake in the share capital of REGIS-TR UK Ltd and REGIS-TR Société Anonyme, a company that set up a branch in Spain.

10 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

11 Bolsas y Mercados Españoles Market Data, SA holds a stake of 49 percent in the share capital of LATAM Exchanges Data México S.A. de C.V.

12 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 share of 11 percent, 9 percent, 21 percent, 48 percent and 11 percent in 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, 2024

<b>7.8 %</b>	<b>0,99%</b>	<b>5,65 %</b>	<b>5 %</b>	<b>11,27 %</b>	<b>22,63%</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	OpenBrick, S.L. 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, specifically in Colombia and Mexico. In 2024, BME announced its investment in OpenBrick, a digital platform for the issue, management, contracting and liquidation of tokenized securities linked to real-estate projects. The registered and operational headquarters of BME and of all Group companies (with the exception of REGIS-TR,

S.A., REGIS-TR UK, Ltd and BME Latam S.A.S. and LATAM Exchanges Data México S.A. of C.V. (LED Mexico), are located in Spain. BME headquarters are located in Madrid, at Plaza de la Lealtad 1, while the organization's main operational headquarters are in Las Rozas (Madrid), at Calle Tramontana 2bis. The corporate operations carried out during 2024 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.
<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, operate within the 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 these 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.



Business Units	Value Chain	
<b>Exchanges:</b>	<b>Markets</b>	Equity
		Fixed Income
		Derivatives
<b>Securities Services:</b>	<b>Market Data</b>	Market Data
	<b>Post-Trade</b>	Clearing
		Settlement and Registration
<b>Financial Information:</b>	<b>Value added services</b>	Value added services

To guarantee success in the implementation 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 increase its contribution to society and environmental protection.

In addition, this business model allows BME to play a crucial role in the engine of the Spanish economy, contributing

through factors including but not limited to investments, the payment of taxes or the generation of quality employment. In this context, in 2023, the company generated more than 310 million euros in 2024 (+3% compared to 2023), of which it has distributed over 262 million euros (+6.5% compared to 2023), which translates to 82%, among its stakeholders.

## Holdings in governing companies of Latin American financial markets, the energy market and others in the financial sector at December 31, 2024

Some comparative data for 2023 have been amended as new accounting regulations have been applied in 2024, retroactively applying to the data for 2023.

### Economic value generated, distributed and retained<sup>13</sup> (201-1) (THOUSANDS OF EUROS)

	2023	2024
<b>Economic value generated</b>	<b>300,489</b>	<b>311,966</b>
Revenue	279,654	293,146
Other net gains and losses <sup>14</sup>	20,835	18,820
<b>Distributed economic value</b>	<b>245,733</b>	<b>262,258</b>
Operating costs	57,078	79,667
Personal expenses	89,545	102,727
Dividends	60,203	46,829
Income tax and other taxes <sup>15</sup>	38,287	32,540
Associations, donations and other investments to the community	620	495
<b>Retained economic value (undistributed profit)</b>	<b>54,756</b>	<b>49,708</b>
Reserves	15,845	28,155
Amortization and depreciation	38,911	21,553

<sup>13</sup> The revenue balance for 2023 and 2024 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.

<sup>14</sup> 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.

<sup>15</sup> Exclusively includes the expense for Income Tax and other taxes recognized in the year.

## Promotion of the competitiveness of the Spanish economy

Financial markets have played a critical role in society since their origin, since their main objective lies in channeling financing to companies and Public Administrations, thus promoting economic development and social well-being. In this context, a competitive and stable economy is essential to instill confidence in the markets, foment economic growth and preserve employment, thus creating a more predictable economic environment with less volatility.

As the central manager of the financial markets and systems infrastructure in Spain, BME plays a crucial role in promoting the competitiveness of the national economy. In 2024, BME reaffirmed its commitment in the form of key initiatives including the presentation of the White Paper on Spanish financial markets and its participation in the 20th anniversary of the Medcap Forum. These actions are designed to identify and address current barriers, as well as implementing measures that improve the competitiveness of the Spanish capital market at a European and international level.

The ability of BME to safely and efficiently manage the Spanish financial market is supported by an advanced technological infrastructure and a continued focus on innovation, digitalization and cybersecurity. Its commitment to financial education also contributes to economic stability, providing society and the sector with the necessary knowledge to make informed and responsible decisions.

Lastly, the participation of BME in significant organizations that promote the sustainable development of the Spanish financial center reinforces its role in the creation of a solid and competitive economic environment. These initiatives underline the commitment of BME to practices and policies that support sustainable and responsible economic growth, positioning Spanish capital markets as key drivers of the country's economic development.

### Promotion of the White Paper of BME

In January 2024, BME published the White Paper on the current state of the Spanish financial markets, highlighting the critical role they play in the economy and proposing possible measures to improve their competitiveness. This long-term project is based on the conviction that financial markets are essential for the financing and solidity of the business fabric, as well as for supporting the transition towards a sustainable economy.

The White Paper concludes that the Spanish capital market requires combined efforts to improve its competitiveness. It has detected a deficit in size and in the current regulatory and fiscal framework that places the Spanish capital market at a disadvantage compared to other countries against a backdrop of global competition.

Based on these conclusions, in its White Paper BME proposes 56 specific measures and actions that, if implemented, would allow the Spanish capital markets to position themselves at the level they should be at in terms of competitiveness, presence and attractiveness in the European and international sphere, in line with Spain's true economic weight. These measures are divided into four main blocks.



- **The first is structured around promoting the inclusion of companies into the Spanish securities markets**, simplifying the listing processes, maintaining and increasing tax incentives, eliminating the obligation to move from the multilateral trading system to the main market when surpassing a capitalization threshold, the streamlining of product authorization processes in derivatives markets and clearing houses, and the implementation of the measures proposed by the DEBRA Directive in the Spanish Corporate Tax regulations.
- **The second block is structured around improving the channeling of investment toward companies**. The measures include the development of formulas to encourage the participation of retail investors in the Spanish stock markets, the flexibility and promotion of investment in SMEs, the modification of the trading framework, the incentive for IPOs and the application of exemptions for non-residents on dividends received.
- **The third main objective is to attract keeping savings and investment in national markets, avoiding their relocation**. To achieve this, the elimination of the Financial Transactions Tax in Spain has been proposed as well as the development of a communication strategy to increase the volumes of fixed income issues by large Spanish companies, the expansion of the tax exemption in the Income Tax of Non-Residents to capital gains obtained on securities listed in markets for SMEs in growth (BME Growth), improve and expand the access of retail investors to the primary and secondary Public Debt market and the modification of the regulation relating to ETFs.
- **The fourth and final block aims to promote the effective development of new regulated investment and financing ecosystems**. This includes streamlining the creation of structures to harness the simplified Mica framework, the establishment of an incentive tax framework for digital asset activities, the design of a national Financial Education Plan aimed at improving the diversification of the savings structure and investment of Spanish families and align with Europe, the adaptation of regulations and taxation for the creation of an individual investment product in the form of an “umbrella” account or fund that allows transfers between eligible assets, in addition to the promotion of national monitoring and continuous improvement as regards the competitiveness of the Spanish capital markets.

## Support for SMEs and startups

Support for small and medium-sized companies is a material issue for BME, as reflected in the double materiality analysis performed during 2024.

SMEs account for more than 95% of the Spanish business fabric in terms of number and creation of jobs. This circumstance is the same as its neighboring surrounding economies. Increasing the size of companies is a common objective aligned with the EU Capital Market Union initiative, an aspect on which the company has been working for years with an eye on the long term.

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 29 partners and 20 companies to enable expanding SMEs to learn about the functioning of capital markets and access private institutional investors.

BME Scaleup is the first rung in financing through the securities markets. This market, created in 2023, is aimed at companies in an early development phase with a proven and scalable business model from any sector. The next rung is occupied by BME Growth, a trading platform aimed at small capitalization companies in the growth phase. Since it was founded 19 years ago, 180 small and medium-sized companies have debuted on this market, with a clear orientation towards sectors less represented in the main market, such as information technology, biotechnology and health, telecommunications and renewable energy.

In 2024, BME Growth also launched a market for SOCIMIS with an impact in which reduced rates apply; TÚTecho, an entity focused on acquiring homes, renovating them and

renting them to social institutions who then offer them to the homeless joined the market during the year.

At the end of the year, BME reached a strategic agreement with EsTech, the platform that brings together Spain's main technological scaleups, with a view to supporting companies with the greatest growth potential to help attract capital and access the stock markets.

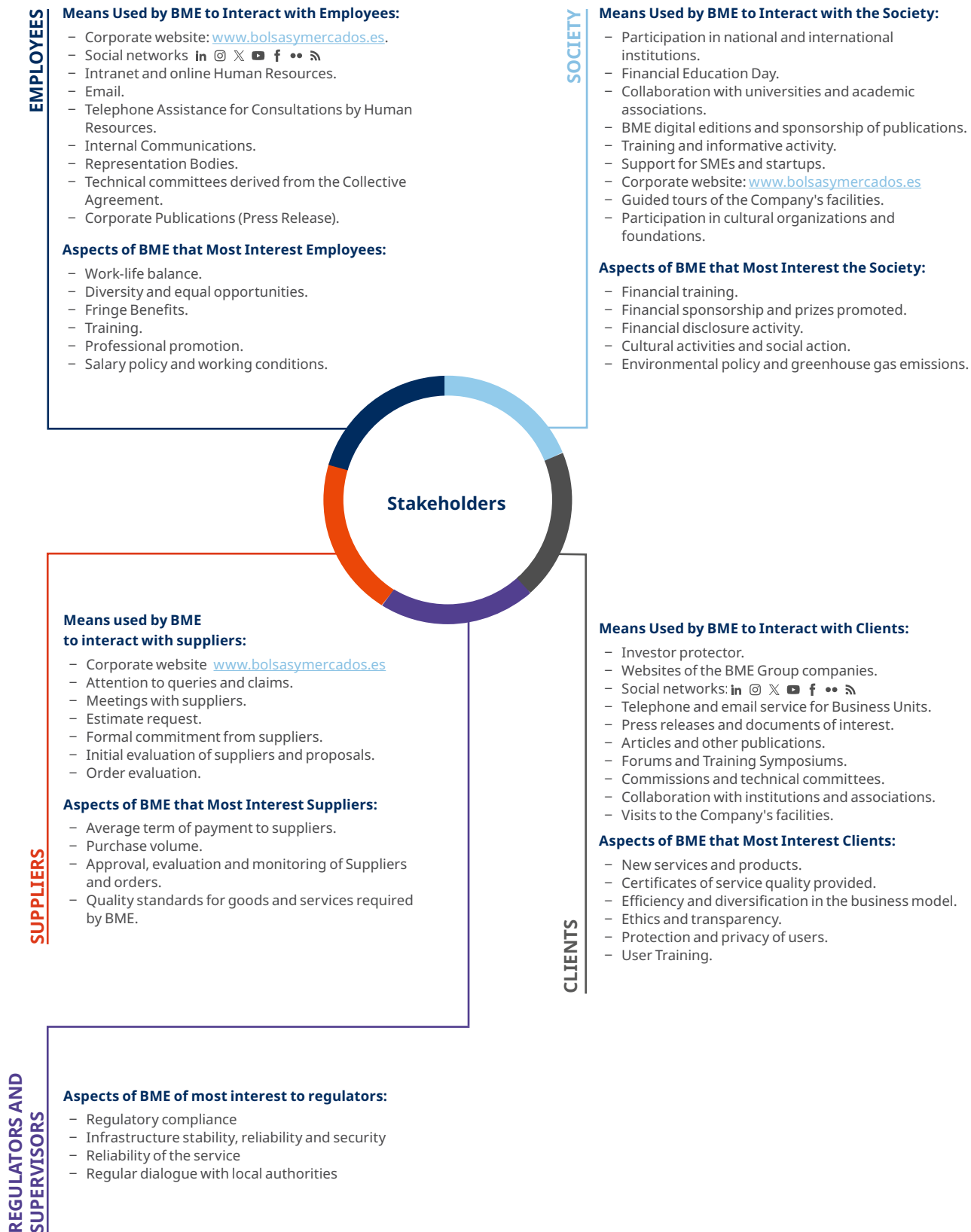
In the field of fixed income, BME created the Alternative Fixed Income Market (MARF) in 2013, which offers financing to companies of any size and through a variety of schemes and products, such as promissory note programs, bond issuance, ESG bonds and project bonds. This market offers advantages to both companies (greater financing capacity, visibility and prestige, internationalization, etc.) and investors (portfolio diversification, access to new corporate issuers, profitability through new products, etc.). A total of more than 160 companies have now received financing on this market since its creation.

As well as promoting these markets, BME is involved in different initiatives to promote the financing capabilities of small and medium-sized companies individually and with different collaborators. These actions include the Medcap Forum, which in 2024 celebrated its 20th edition, or the collaboration with entities such as Asebio (association to promote biotechnology in Spain), Start-up OLÉ and Al-Andalus Innovation Venture (to promote the entrepreneurial ecosystem) or CEPYME 500 in cooperation with the Spanish Confederation of Small and Medium Enterprises.

## Group stakeholders (2-16 , 2-29)

Over the course of 2023, BME and SIX embarked upon a joint reflection to update their stakeholder map. As a result of this exercise, BME and SIX have identified five priority stakeholders for the Company and its activities, which are the users of the services it provides, its own employees, society in general, its service providers, policymakers and regulators.

To consolidate a constructive relationship with the aforementioned stakeholders, BME and SIX maintain the communication channels that allow the Company to respond to their expectations. BME and SIX base the frequency of their relationship with their main stakeholders on their business' needs. These channels of communication, as well as the participation of stakeholders via them, is reflected in the following table:



## Value generated by BME for its stakeholders

The Board of Directors, when approving this report, sets out the significant issues that have arisen in the relationship and communication of the Company with its stakeholders and the departments involved in said relationship. 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.



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, facilitating collaboration between competent international investors, companies, regulators and organizations in this field. In this regard, it positions itself as a global platform that seeks to offer the necessary tools to maximize the role of responsible investment in sustainable development.

In line with this commitment, BME encourages issuers of securities and new companies listed on the markets and systems managed by BME to report environmental, social and corporate governance non-financial information in their reports, as well as the issuance of bonds linked to sustainability.

### **United Nations Global Compact**

Since 2024, BME has been affiliated to this initiative through the SIX Group. This initiative aims to promote business sustainability through the implementation of 10 Universal Principles of conduct and action in areas such as Human Rights and Business, labor standards, the environment and the fight against corruption, in the strategy and daily operations of all types of entities, thus contributing to the attainment of the Sustainable Development Goals.

BME assumes its essential responsibilities in matters 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)**

Having signed up to the Code in 2010, its purpose 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.

Almost all BME Group companies domiciled in Spain individually comply with the CGTP.

## 2.1 Sustainability strategy (2-22)

SIX plays a crucial role as an infrastructure for financial markets and as a solutions provider. Its position in the intersection between financial markets and companies actively contributes to the transition toward a sustainable economy.

Like any strategic Group matter, the Board of Directors of SIX is the body responsible for supervising the implementation of the sustainability strategy and decision-making.

The Management Committee is responsible for implementing the sustainability strategy in each business unit and, to this end, it meets at least quarterly to assess the progress made. In 2023, a dedicated organizational structure was designed to promote and supervise actions linked to sustainability with transversal representation also

at BME. In 2024, Irene Rodríguez joined the Company as Sustainability Director to coordinate actions internally and ensure alignment with SIX.

The sustainability strategy of SIX is structured around four pillars.

For each of these pillars, specific targets have been defined with the overall aim of speeding up the transition to a more sustainable future.

At SIX, the sustainability strategy is managed as part of a structure with defined responsibilities, which guarantees their approval, implementation and effective monitoring.





## 2.2 Contribution of BME to sustainable finance

The social function of financial markets has been vital since their creation, since they are designed to facilitate the flow of resources towards business growth and, as a result, toward general economic progress, thus benefiting society. In countries in which companies diversify their financing sources through capital markets, stronger and more resilient economies are observed.

Recently, sustainable finance has experienced a notable boom, driven by the European Union's Green Deal. This ambitious plan seeks to transform the European economy toward a more ecological and sustainable model, establishing clear objectives to reduce carbon emissions and promote the use of renewable energy. To achieve these objectives established by the Pact, the active participation of the private sector is essential. Furthermore, in this context, the growing interest of investors in sustainability has played a crucial role.

BME is staunchly committed to sustainability, which is rooted in two areas: as a company and as an administrator of the financial markets.

As a company, BME meets high sustainability standards, promoting events oriented toward this topic, promoting financial education and participating in global initiatives such as the Global Compact and the United Nations Sustainable Stock Exchanges Initiative.

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 fifteen years to offer the possibility of issuing ESG bonds through Fixed Income markets and ESG indices through the Equity markets.**

In its role as financial markets manager, BME provides a conducive environment for the development of sustainable finance in all its forms. This includes investing with socially responsible criteria in shares, through its FTSE4Good IBEX, IBEX® Gender Equality and IBEX® ESG indices, to the promotion of bonds that follow sustainability criteria.

**BME also facilitates access to business financing, providing the necessary infrastructure for companies to access the capital markets.**

An essential component of this process is the Pre-Market Environment (EPM) program, which provides training and networking opportunities for SMEs to understand how capital markets work and access private and institutional investors.

As companies progress in their development, they can access BME Growth, which supports companies from any sector and operates as a self-regulated market. This makes it possible for BME to simplify the administrative process and costs, thus maintaining a high level of transparency for investors.

For those companies in an even earlier phase of development, BME offers BME Scale Up, a trading segment specifically designed to accompany them in their initial stages of growth.

Finally, via the Fixed Income market, BME promotes initiatives to facilitate access to financial for small and medium-sized companies.

In order to maximize its contribution to sustainable finance, BME has worked throughout the year in different areas:

In 2024, **BME Growth welcomed tuTECHÔ**. The including of this company is especially significant for BME, since it is the first SOCIMI with a social impact to join the market. This inclusion reflects the dedication of BME to the fight against homelessness, as tuTECHÔ is dedicated to helping homeless people find housing and supporting them in the early stages of their reintegration. In recognition of the social work performed by tuTECHÔ, BME has offered a series of facilities, including lower costs, to allow its listing on the market. By doing so, BME not only supports the tuTECHÔ project, but also opens the door for other companies with similar objectives to gain access to financial markets and access financing, thus facilitating the continuity of their projects.

During the year, **BME teamed up with Spainsif** to promote sustainability through this platform, which sets the benchmark for sustainable and responsible finance in Spain. Spainsif has associate members including the main financial institutions, insurers, management firms, service providers, unions and non-profit organizations. Being a member of Spainsif is aligned with the sustainability strategy at SIX, since being part of Spainsif provides impetus to the actions of the Spanish market to promote sustainability. This collaboration promotes ESG financial products and services, such as green bonds and ESG indices, and provides market participants with tools for non-financial reporting. BME also enhances this membership by participating in expert groups, such as those focused on the EU regulatory framework, sustainable bond issuers and impact investments. BME also has access to training and events organized by Spainsif.

In 2024, **BME, in collaboration with UN SSE (Sustainable Stock Exchanges), the International Financial Reporting Standards (IFRS) Foundation, the IFC (International Finance Corporation) and CDP (Carbon Disclosure Project), delivered a free CDP-certified course**. The aim of this course was to help participants understand the fundamentals of the IFRS Sustainability Reporting Standards (IFRS) and guide them through a four-step process to prepare, align, implement and communicate information related to sustainability. This training included a practical step-by-step guide to help participants build the foundation necessary to identify climate and sustainability issues, integrate them into strategic decision-making and governance processes, and measure progress and resilience.

**BME has also offered a complementary course with a view to helping participants in the Spanish capital markets to apply the new rules and encourage consistent and global uptake**. This course was organized by the Ibero-American Federation of Stock Exchanges and Markets (FIAB), in collaboration with the UN SSE and the IFC, with support from the IFRS Foundation to provide free training in the UN SSE associated exchanges.

In turn, the BME Institute launched the second edition of the sustainable financing course in 2024 in collaboration with the Spanish Observatory of Sustainable Financing (OFISO), whose objective is to provide the necessary knowledge for companies to learn about sustainable financing instruments and formulas, market operations, the applicable regulations and the risks posed. The relationship with OFISO is also strategic and as a result, BME also participates in its annual awards ceremony and collaborates in other events such as "Spanish Mid & Small caps: performance in sustainability

and opportunities in Sustainable Financing", which is also organized with Ethifinance.

During the year, a perception diagnosis was carried out in collaboration with consulting firm Transcendent, in which priorities were established for the development of BME as a center for sustainable finance, including the improvement of information on sustainability of fixed income and equity issuers.

## 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®, FTSE4Good IBEX® indices and the IBEX ESG® family of Indices.

**The IBEX® ESG index, launched in 2023 and originally composed of 47 Spanish listed companies that promote sustainable investments, has been reviewed for the first time by the Technical Advisory Committee this year, achieving 49 components.** This sustainability index was created with a view to providing independent information to the market on the performance of companies in environmental, social and governance aspects. The information necessary to measure the impact of companies is provided by Inrate, an independent provider. To be eligible, companies must receive an ESG rating of at least C+ from Inrate, 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 promotes sustainability among issuers and offers transparency to investors interested in companies with high sustainability standards.

**Likewise, the IBEX® Gender Equality index, launched in 2021 to promote gender equality among listed companies, has reached a record number of 57 components after its annual review in 2024.** This index has increased by 10.8%, which indicates continuous growth since its creation and reflects the commitment of listed companies to gender equality, a factor that is increasingly appreciated by investors. The IBEX® Gender Equality is updated on an annual basis using information published by the National Securities Markets Commission (CNMV). To be part of the index, the female presence on companies' Board of Directors must be between 25% and 75%, and between 15% and 85% in senior management.

**The FTSE4Good IBEX® index, designed to promote sustainable practices among listed companies, has reached a record of 43 components after its annual review in 2024.** This index has improved by 24.5% over the past 5 years, demonstrating constant growth and underlining the commitment of listed companies to sustainability.

## Integration of ESG criteria in fixed income

Fixed income issues classified as ESG, whether green, social, sustainable or linked to sustainability, are an instrument that BME makes available to private and public sector entities to seek financing through the issuance of debt to obtain financial resources. These types of issues are intended to finance business economic activity or specific projects that seek to generate a positive impact on society and/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 financing to achieve their environmental and social objectives. In this context, at the end of 2024, considering securities from Spanish and foreign issuers, the AIAF Fixed Income Market has more than 80,000 million euros in ESG-labeled issues while the MARF has admitted promissory note programs and green and sustainable bonds to trading worth more than 2,500 million euros.

Sustainable financing continues to grow and feature more prominently in Spain. According to data from the Spanish Observatory of Sustainable Financing (OFISO), sustainable financing in Spain reached a record figure of more than 65 billion euros in 2024, 8% up on 2023. In relation to this figure, ESG financing through fixed-income securities markets is worth particular note, in the form of the issuance of green, social, sustainable or sustainability-linked promissory notes, bonds or securitizations, which account for around 45% of the total volume raised by public administrations or Spanish companies.

During 2024, developments in sustainable financing and its regulation continued in the European Union. A wide range of ESG regulations and guidance were published, which in some cases will apply effective 2025, such as: the entry into force of Directive 2024/1760 on due diligence in corporate sustainability DDDCS. EU member states have until July 2026 to transpose this Directive into their national legislation, and it will apply to companies progressively between 2027

to 2029, depending on their number of employees. ESMA published new guidelines for investment funds that include ESG and sustainability related terms in their names and the EBA, EIOPA and ESMA published their final reports on greenwashing in the financial services sector, in response to the request from the European Commission. In December, the first European Union green bond standard (EUGBs) came into force, with a view to promoting transparency by aligning with the EU Taxonomy.

BME, in line with the sustainability strategy at SIX, is committed to continuing to offer data, products and services that contribute positively to the sustainability goals of our clients and their end users.

## Innovation as a growth lever <sup>(3-3)</sup>

Constant technological changes drive BME to develop new data, 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.

Against this backdrop, BME has different initiative areas that promote projects and initiatives that involve innovation from a technological and/or business model perspective, with a particular focus on digital assets and artificial intelligence. In this area, the following is worth particular mention:

- In this context, in 2024, BME announced its participation as a DLT (distributed ledger technology) market operator in the Eurosystem experimentation program. This program aims to explore the potential of DLT technology in the settlement of financial assets and its integration with existing market infrastructures. Thus, BME plays a key role in the development and testing of innovative solutions that could improve efficiency and security in financial markets, reflecting its commitment to innovation and adaptation to emerging technological trends.
- At the same time, in 2024, SIX announced its investment in OpenBrick, a digital platform dedicated to the tokenization of real-estate securities in Spain. This investment highlights the interest of SIX in emerging technologies and the potential of tokenization to transform the real-estate market by improving the liquidity and accessibility of assets. The participation of SIX in OpenBrick is aligned with its strategy of innovation and adaptation to new technological trends in the financial sector, complementing its role in the Eurosystem's experimentation program with DLT technology. Both strategic moves demonstrate how BME and SIX are actively committed to technological advancement in financial markets.

BME has also created a comprehensive package for MICA compliance, including the necessary data and a Market Abuse service tailored specifically to cryptocurrency assets.

This year, major progress has also been made following the integration of artificial intelligence in different areas. With this in mind, models have been developed aimed at improving the internal efficiency of systems, optimizing processes and increasing productivity. However, the achievements do not stop there: we have also launched and expanded our capabilities in a number of core areas. Examples of this are the data-mining platform that allows advanced data extraction from news and documents.

In the area of services aimed at regulatory compliance, new AI-driven functions have been introduced that expand and simplify data analysis, for example in Market Abuse (SICAM) services, improving the monitoring and detection capacity.

The most notable milestones to this end include the launch of a new version of the SIX ID information terminal, which uses Generative AI to interact with users in natural language, offering a more fluid and intuitive experience. These developments reflect the enormous transformative potential of artificial intelligence to drive efficiency, strengthen regulatory compliance and improve user interaction.

# 3. Environmental protection commitment (3-3, 302, 303, 305, 307)

BME considers environmental sustainability as a long-term strategic opportunity, key to the development of the company and the financial markets, as it promotes responsible financing. This is reflected in the issuance of green and thematic bonds, which are critical to the transition towards a greener, more resilient economy.

The offices of BME and the location of its headquarters in urban areas do not generate a significant direct environmental impact. For this reason, aspects such as waste management, materials, biodiversity, food waste, possible noise or light pollution or emissions harmful to the ozone layer, nitrogen oxides, carbon oxides, sulfur and other emissions have not been prioritized.

In terms of environmental risks, BME has evaluated these factors as part of its risk management and concluded that, at present, the risks posed by its activities are not significant. Therefore, it has not incurred relevant environmental expenses, assets, provisions or contingencies that could significantly affect its finances or assets, nor has it established specific environmental evaluation or certification procedures. In this context, given the low environmental impact of its activities, BME does not have an Environmental Management System in place; however, it applies the precautionary principle defined by GRI, pursuing efficient environmental management at all times.

As a result, and in line with previous years, in 2024, like in 2023, BME did not receive any fine or significant firm sanction for non-compliance with regulations related to environmental aspects. [\(2-27\)](#)

In 2022, SIX responded to a request from the Swiss National Bank (SNB) to clarify the possible impact of climate-related natural hazards on its facilities in Switzerland. This analysis was guided by a catalog of climate-influenced natural

processes, including heat, avalanches and flooding. The assessment followed an approach structured around four steps.

The first step was to evaluate, at a facility level, whether these natural processes were relevant or could become relevant in the future.

As part of the second step, the relevant processes for each facility were rated at four points in time (2022, 2025, 2035, 2060), supported by a qualitative assessment of the reliability of the ratings.

The third step included a thorough qualitative and quantitative examination of each relevant process by facility, forecasting trends and providing practical recommendations to SIX.

The fourth step consisted of analyzing the impact of these natural threats on the operations of SIX. The findings were then compared to the existing risk inventory at SIX for alignment and validation.

This exercise was performed by experts in the subject matter from the property management team, with support from the crisis, business continuity management and physical security teams.

In 2024, this analysis was carried out for the first time at a Group level for the operations of BME in Spain. The Group's internal risk inventory has been updated accordingly.

## 3.1 Net Zero Strategy

The climate strategy at SIX forms part of the sustainability strategy of the SIX Group and, therefore, BME. SIX actively supports the successful transition to a climate-resilient and low-carbon economy.

SIX aims to reduce its use of non-renewable resources and its greenhouse gas (GHG) emissions. In 2022, SIX signed up to the Science-Based Targets (SBTi) initiative. In 2023, it began its iterative efforts to lay the foundations for a robust database for the climate transition plan. In 2024, with

approval from the Management Committee, SIX submitted science-based GHG emissions reduction targets aligned with the SBTi. In November 2024, the initiative approved the targets, confirming that the net zero goal was in line with its Corporate Standard and that the classifications of the scope 1 and 2 targets were consistent with the Paris Agreement to limit global warming to 1.5°C above pre-industrial levels.

The objectives cover short-term, long-term and supplier commitment goals: [\(201-2\)](#)

### Overall net zero target:

- SIX commits to reaching net zero GHG emissions across the value chain by 2050.

### Near-term targets:

- Near-term targets: SIX commits to reducing absolute scope 1 and scope 2 GHG emissions by 42% by 2030. Furthermore, SIX commits to reducing absolute scope 3 GHG emissions from capital goods, business travel, and employee commuting by 25% within the same timeframe.
- SIX also commits that by 2029, 60% of its main suppliers (by emissions) in purchased goods and services, will have science-based net zero reduction targets..

To achieve these scope 1 and 2 emissions reductions targets, SIX and BME are committed to identifying the most critical sources of emissions from the offices and data centers and implementing a series of measures that allow these objectives to be achieved on the planned dates, such as:

- Improve the **precision of data** in different locations to reduce conservative estimates.
- Switch to **100% green electricity** at all office locations.
- Potential to **electrify heating** and use the **recovery of residual heat** (at data centers).
- Reduce the loss of **coolants** or use coolants with a lower global warming potential.
- Optimize **climate control at office buildings** (management of lighting, regulations based on HVAC needs, smart measurements).
- Improve the **Power Usage Effectiveness (PUE)** at in-house data centers and replicate best practices where possible.

**Long-term targets:**

- SIX commits to reducing absolute scope 1, 2, and 3 GHG emissions by 90% by 2050.

Achieving the targets to reduce scope 3 emissions entails involving the SIX and BME chain of value through measures such as:

- Improving the **accuracy of data** in relation to purchased goods and services and capital goods (for example, by increasing the proportion of direct Product Carbon Footprints from suppliers) to reduce conservative estimates.
- Using existing **IT hardware** as efficiently as possible, purchasing refurbished items and integrating the product's carbon footprint into purchasing decisions.
- Increasing **awareness**, strengthening education about sustainable mobility and leading by example.
- Reducing **emissions generated by business travel** (e.g. strengthen rules, define flight-free routes when a valid train substitute is available, use settings in the travel management system to make sustainable travel the default option).
- Supporting **sustainability mobility benefits** for employees further.



## Climate change performance

Materializing its commitment to responsible environmental management, throughout 2024, BME launched various initiatives to reduce its energy consumption and GHG

emissions both proactively and within the framework of the Sustainability Strategy and Net Zero Strategy at SIX.

- **Renewable energy consumption:** Ensure that 100% of energy consumption at BME offices managed by the real-estate management (REM) department comes from renewable sources.
- **Implementation of solar power:** Install solar panels at BME offices located in Las Rozas to reduce grid energy consumption.
- **Sustainable mobility:** Install charging stations for electric vehicles at BME offices in Las Rozas, thus promoting sustainable mobility.
- **HVAC system update:** Replace the HVAC system in BME building 2 in Las Rozas and the office in Barcelona.
- **Energy efficiency at the data center:** Outsource the data center at the offices of BME located in Lealtad to increase its energy efficiency and power usage effectiveness (PUE).
- **Monitoring of energy consumption:** Install electrical network analyzers in all electrical panels at the offices of BME in Las Rozas to obtain energy consumption information in real time.
- **Improvement of thermal insulation:** Improve insulation in the roof of BME office building 2 in Las Rozas.
- **Waste management:** Improve the waste management process at all BME offices managed by the REM department.

Additionally, in 2024 a series of measures have started to be implemented, which are expected to be completed over the next five years (2025-2030):

- **Replacement of all transformation centers** at the Las Rozas office at the end of their useful life with new, more efficient models.
- **Replacement of the entire climate control system** at the Lealtad office, thus eliminating fuel oil heating and reducing CO2 emissions for the large part.
- **Improvement of the efficiency of the cooling system** in the data center at the Las Rozas office, with a view to reducing its PUE as far as possible.

Thus, in line with the commitment to the environment and sustainability, BME has undertaken a series of 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.

The internal initiatives include the reduction of emissions generated by its lighting systems, air conditioning systems and technological assets.

## BME environmental performance at a glance



**Avoided emissions: 9,180.28 tCO<sub>2</sub>**  
(corresponding to Scope 2)



**Renewable energy consumption: 32,156GJ**



**Reduction in Scope 2 emissions vs 2023: 91%**

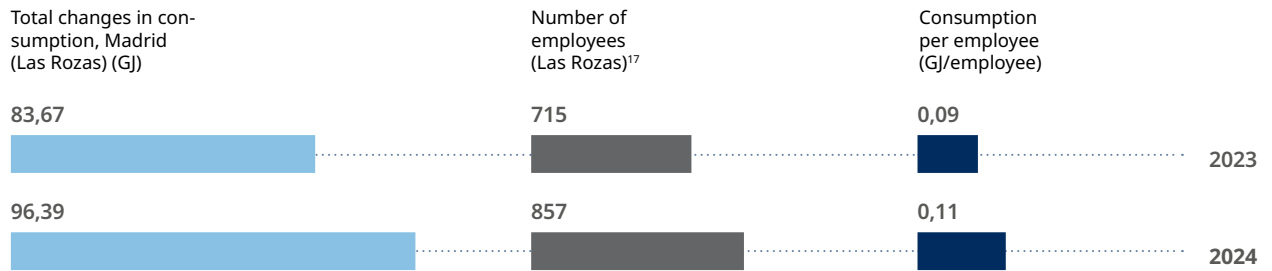
## Electricity consumption indicators by geographical areas in Spain <sup>(302-1, 302-3, 302-4, 305-5)</sup>

<b>Madrid (Las Rozas and Lealtad)</b>	<b>2023</b>	<b>2024</b>
Total consumption (GJ)	30,332.37	29,611.97
Number of employees in Madrid <sup>17</sup>	827	915
Consumption per employee (GJ/employee)	36.67	32.36
<b>Barcelona</b>		
Total consumption (GJ)	1,751.48	1,464.07
Number of employees in Barcelona <sup>17</sup>	76	85
Consumption per employee (GJ/employee)	23.04	17.22
<b>Bilbao</b>		
Total consumption (GJ)	1,118.11	1,050.53
Number of employees in Bilbao <sup>17</sup>	21	19
Consumption per employee (GJ/employee)	53.24	55.29
<b>Valencia</b>		
Total consumption (GJ)	146.36	38.71 <sup>16</sup>
Number of employees in Valencia <sup>17</sup>	13	10
Consumption per employee (GJ/employee)	11.25	3.87
<b>Total Spain</b>		
Total consumption (GJ)	33,348.33	32,165.29
Number of employees <sup>17</sup>	942	1029
Consumption per employee (GJ/employee)	35.40	31.26

<sup>16</sup> The data for the Valencia office does not include electricity consumption for the months of July, August, September and October. This is due to a change in office location, with the previous contract ending in June and the new contract not starting until November. During this transition period, no activities were performed at any office; therefore, no electricity consumption was recorded during these months.

<sup>17</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).

## Gas consumption indicators in Spain (302-1, 302-3)



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

2024 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)

	2023	2024
<b>Scope 1 emissions<sup>9</sup> (equivalent tons of CO<sub>2</sub>)</b>	<b>185.81<sup>21</sup></b>	<b>199.27</b>
Natural gas consumption <sup>18</sup>	4.23	5.40
Diesel consumption <sup>18, 19</sup>	45.52	33.38
Refrigerant gas consumption <sup>18</sup>	129.93 <sup>21</sup>	156.34
Employee transportation <sup>18, 20</sup>	6.13*	4.16
<b>Scope 2 emissions (equivalent tons of CO<sub>2</sub>)</b>	<b>7.31</b>	<b>0.69</b>
Electrical consumption <sup>22</sup>	7.31	0.69
<b>Scope 3 emissions (equivalent tons of CO<sub>2</sub>)</b>	<b>1.457,85<sup>21</sup></b>	<b>1.581,30</b>
Category 3.3: Fuel and energy-related activities <sup>23</sup>	436.65	171.70
Category 3.6: Business trips	459.01	792.62
Category 3.7: Displacement of employees to the workplace	562.19 <sup>21</sup>	616.97

18 Emission factors used: for natural gas consumption, Miteco 2024; for diesel consumption, DEFRA 2024; for the refrigerant gas consumption, IPCC 2023; and for emissions associated with the transport of employees, DEFRA 2024.

19 In 2023, diesel consumption was calculated based on topped up fuel. For 2024, the methodology has been improved to report diesel consumption based on a more precise estimate of the fuel consumed, allowing for a more accurate calculation of this data.

20 Employee transport data includes the corporate bus and a company car.

21 Data restated due to an error in the calculation in 2023.

22 Scope 2 emissions calculated using the market-based method. The reduction in scope 2 emissions can be attributed to several factors related

to electricity consumption in the Valencia office, the only BME office that was not yet using energy from renewable sources during the first half of 2024. Firstly, there was a significant change in the energy mix of the electricity consumed at this office: compared to 2023, between January and June, the percentage of energy from renewable sources increased by more than 25%. Also, from July to October, no activities were carried out in the office, resulting in no electricity consumption during that period. Finally, in November and December, the energy consumed came entirely from renewable sources.

23 Includes upstream emissions related to gas, diesel and electricity consumption. Emission factors: DEFRA, 2024.

## 3.2 Other natural resources

Although water consumption is not considered a material issue according to the double materiality analysis undertaken, given the nature of the operations of BME, we have decided to include a detailed breakdown of our water consumption. This decision forms part of our commitment

to transparency in environmental matters and will allow us to establish a register that facilitates the development of effective measures to reduce this consumption in the future.

### Water consumption by geographic areas in Spain (303-5)

Water consumption (m3)	2023	2024
Madrid (Las Rozas and Lealtad)	6,645 <sup>24</sup>	6,419
Barcelona	1,839	1,066 <sup>25</sup>
Bilbao	1,159	1,132
<b>Total</b>	<b>9,644</b>	<b>8,617</b>

### National Registry of Emission Rights (RENADE) (2-27)

The National Registry of Emission Rights (RENADE) is a service that BME – Iberclear has provided to the Spanish state since 2005 and consecutively. Initially, this was a service awarded for the upkeep of the Registry directly by the Spanish Office for Climate Change (OECC) for Iberclear; however, since 2013 Iberclear 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. The last tender resulted in a contract which ends on December 31, 2024. Therefore, in 2024, Iberclear submitted and won the subsequent tender, allowing it to continue providing the service until, at least, December 31, 2026, with the possibility of extending this service through three annual extensions, potentially extending its provision until December 31, 2029.

RENADE is the Spanish area of 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). As emission rights only exist in electronic format and are financial assets of a fungible nature, the existence and ownership of an emission right is established

by its registration in an account housed in the Union Registry".<sup>26</sup>

Emission rights are considered financial assets since MIFID II broke onto the financial landscape. Therefore, at RENADE we also monitor all market stakeholders who undertake activities involving the purchase and sale of emission rights<sup>27</sup>, in any of their categories (auctions, financial derivatives in the form of forward contracts, spot contracts, bilateral contracts, etc.), such as intermediaries or market agents, companies that provide investment services, etc., that have a holding account opened in the Spanish area of the Union Registry in which the ownership of the emission rights is reflected. As a result, we also monitor all operations undertaken involving this Registry, controlling topics including but not limited to everything related to Directive (EU) 2015/849 of the European Parliament and of the Council, of May 20, 2015, on the prevention of the use of the financial system for money laundering or the financing of terrorism.

The aim of these emission rights is to maintain control of greenhouse gas emissions in Europe of the taxpayers required to register with this Registry, and they must register to report the gases released into the atmosphere, agreeing

<sup>24</sup> Water consumption from March to May is an estimate.

<sup>25</sup> Water consumption in September and October is an estimate.

<sup>26</sup> Ministry for Ecological Transition, <https://www.miteco.gob.es/es/cambio-climatico/temas/comercio-de-derechos-de-emision/registro-nacional-de-derechos-de-emision.html>

<sup>27</sup> The various types of accounts required for the ETS are housed in the Union Registry: facility owner's holding accounts, aircraft operator's holding accounts, personal holding accounts and trade accounts.

to purchase emission rights in case they have surpassed the permitted threshold or, on the contrary, sell the surplus in case they have managed to reduce their emissions. This system aims to remunerate the industry that strives to reduce the pollution it generates.

At the end of 2023, Commission Delegated Regulation (EU) 2019/1122 of March 12, 2019 was amended by Commission Delegated Regulation (EU) 2023/2904 of October 25, 2023, which supplemented Directive 2003/87/EC of the European Parliament and of the Council in relation to the functioning of the Union Register. Published in the "Official Journal of the European Union" (OJEU, no. 2904) on December 29, 2023 and applicable from January 1, 2024, it forms part of the regulatory development resulting from the "Fit for 55" package of measures that aims to reform the EU ETS and make it more ambitious to achieve the EU's climate goal of reducing greenhouse gas emissions in the EU by at least 55% by 2030 compared to 1990 levels.

As a consequence of this reform, emissions released by maritime transport are expanded in the EU ETS and, in addition, a new independent emissions trading framework is created for fuels consumed in buildings, road transport and other additional sectors, known as the "regulated entities" sector. Thus, a very significant increase is expected in the asset accounts that must be filed with the Union Register. At RENADE we are in constant development and evolution, in line with the guidelines set out in the Fit for 55 and with the European Green Pact. Likewise, one of our duties is to provide coverage to the OECC in assisting working groups at the competent authorities at a European level (European Commission and UN) and in Spain (CNMV, Ministries, regional governments, etc.).

RENADE's critical contribution to sustainability and the achievement of European and Spanish climate objectives lies in the provision of a high-quality service in the public-private sphere to the Spanish Office for Climate Change (OECC); for this service to be provided, certification in the National Security Scheme (ENS) is required given the level of confidentiality of the data processed. This certification was obtained on December 28, 2023. The ENS is a regulation applicable to the entire public sector that includes private law entities related to or dependent on public administrations, as is the case of Iberclear exclusively for its RENADE service. Achieving this certification provides Iberclear-RENADE with a regulatory control framework that allows it to optimize process management and protection against internal and external threats, taking care of its main asset: information, this certification, once obtained, must be renewed at least every two years or every time a fundamental change is made in the aspects covered by the ENS.

RENADE provides a high-quality service to users of the Union Registry, who, as we have seen, may be subjects required (Law 1/2005) to be part of it or subjects who voluntarily join the Registry for the purpose of trading with emission rights, regardless of whether they are required to or join the Registry voluntarily. The quality of customer service on the part of RENADE is one of our most important assets, offering assistance over the phone, via email or in the different manuals and information relevant to the Registry that is constantly updated at [www.renade.es](http://www.renade.es)

Additionally, the only economic benefit that Iberclear receives for the provision of this service is the payment of rates designated by the Ministry for the Ecological Transition (MITECO). The current framework of rates also rewards those who only release low volumes of gas into the environment, since the lower the amount of emissions into the environment, the lower the payment for maintaining an account in the Registry. These rates were amended in June this year.

In short, BME – Iberclear, as part of its responsibility for maintaining the Spanish Area of the Union Registry, contributes to Spanish, European and world climate sustainability through an efficient relationship with the State and providing premium quality customer service to users, constantly and positively contributing to the reputation and image of the company at all levels. We continue to strive to offer this level of excellence employing all the resources within our reach.

# 4. Social contribution of BME

## 4.1 Commitment to our human capital

The responsibility of BME begins with the promotion of good labor practices and the promotion of equality and diversity among its employees. Its employees are the most valuable asset of BME; with this in mind, its Human Resources area seeks to guarantee a work environment free from discrimination. BME promotes an environment in which employees are respected and are not discriminated against based on gender, race, religion, age, nationality,

health status, identity or sexual orientation, in addition to encouraging their professional development.

As a result of its efforts, as in 2023, BME did not receive any fine or significant firm penalty for non-compliance with corporate regulations. [\(2-27\)](#)

### Current employee profile\*

Women	Men
I represent <b>34.66%</b> of the workforce	I represent <b>65.34%</b> of the workforce
I represent <b>23.75%</b> of recruitments in 2024	I represent <b>76.25%</b> of recruitments in 2024
I have a permanent contract ( <b>34.67%</b> )	I have a permanent contract ( <b>65.33%</b> )
I am between 30 and 50 years old ( <b>19.55%</b> women)	I am between 30 and 50 years old ( <b>37.08%</b> men)
I received <b>24.95 hours</b> of average training in 2024	I received <b>26.43 hours</b> of average training in 2024
I work in Spain ( <b>99.4%</b> women)	I work in Spain ( <b>99.7%</b> men)

\* The employee data provided in this report corresponds to the entire workforce of the BME Group.

## Attraction and retention of talent (404-1, 404-2)

BME promotes the professional development and talent of its employees. This commitment is reflected in the training and recognition of the achievements, the efforts and dedication of each team member. As well as rewarding its employees, BME considers that a key factor in attracting and retaining talent lies in offering social benefits, promoting diversity and guaranteeing health and well-being in the workplace.

To this end, with a view to demonstrating these professional opportunities to society, BME launched a program in 2023 to promote BME as an employer brand (branding employer), 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. In 2024, this program remained in place.

### a) Remuneration policy and professional promotion measures (2-20)

For BME, the professional development and talent of its employees is an essential opportunity for retaining talent. To this end, it promotes an occupational environment that promotes the integrated growth of its workers. In this context, BME offers job promotion opportunities based on three main criteria: an annual evaluation of performance, training and track history in the position.

BME recognizes that employment quality is intrinsically linked to attractive salary conditions and adjusted to

the performance of its employees. These conditions are determined through a Remuneration Policy whose objective is to attract, retain and motivate the company's professionals. This policy is structured around a set of procedures designed to align market dynamics with the business's strategic objectives and it comprises three components:

- 1. Fixed remuneration:** Fixed remuneration: It includes the base salary established in the applicable Collective Bargaining Agreement and a personal supplement that remunerates, with no 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:** It is based on the annual variable remuneration, depending on the attainment of the Group Performance Factor (GPF), the area's objectives and the medium-term remuneration, the purpose of which is to attract, retain and commit mainly the executives and outstanding employees at the Group.
- 3. Fringe benefits:** It includes 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 talent development (3-3, 404-1)

BME demonstrates its commitment to the employee training by promoting plans that enhance the training and professional improvement of its workers, guaranteeing the possibility of training for all employees, as reflected in Article 26, section b) of the Collective Bargaining Agreement. With a view to identifying training needs and improving their quality, a Training Committee was created, which includes the union representation of workers.

Since September 2021, BME training has been managed at SIX Academy through the corporate systems at SIX, promoting the professional and personal development of employees through transversal training programs and specific programs directly related to the business objectives, promoting continuous learning and personal growth, enhancing self-leadership and the development of all employees and reinforcing people's leadership.

The entire catalog of training offered by SIX Academy is structured around the development of the SIX Leadership Capabilities (Demonstrate self-leadership, Lead others, Build talent, Make the business work, Drive Agility and Innovation and Orchestrate Ecosystems) and applying a 70:20:10 learning model, based on which people learn mainly through experience and reflection, as well as by working and interacting with others, making formal training only one element for people to grow and accelerate their performance.

SIX Academy offers BME employees a variety of training that it publishes in its catalog, including local courses and global courses aimed at the entire SIX Group; this allows them to improve their skills and abilities as part of their day to day undertakings at BME. In 2024, training was mainly offered in a virtual format to provide greater flexibility and access to training for the Group's workers. During 2024, SIX implemented sustainability training at a Group level and for senior management, including access to educational resources such as the United Nations Global

Compact Academy, specialist courses from the University of Cambridge's Sustainability Leadership Institute and comprehensive training in greenwashing, as well as encouraging participation in community activities through its "SIX Social Days"

As part of the catalog of training, BME employees have access to the "Speexx" platform to improve their English, German, French and Italian language skills, the "Udemy for Business" platform, which offers access to thousands of courses to improve their technical capabilities and skills, and to the "Bookboon" digital bookstore, which allows them to download e-books and audiobooks on various topics to support their personal development.

One new feature in 2024 was the organization of "Scale Up Map Workshops" on a global basis; these voluntary workshops have been designed to bring the company's Strategy closer to all employees. These workshops were implemented locally, organizing face-to-face groups in Madrid, Barcelona and Bilbao, reaching 66.9% of the BME workforce.

- Constant updating of services and delivery methods to satisfy new customer needs.
- Improvement proposals and ideas prepared by each employee in the scope of their work.
- Close link between the provision of high-quality services and the continuous training of staff.
- Supplier adherence to our quality approach and participation in the continuous improvement program.
- Annual definition of priority areas based on staff initiatives, customer demands and comparison with competitors, aligned with the strategic objectives of the BME Institute.
- Appropriate identification, analysis and management of risks and opportunities in processes.
- Knowledge, analysis and orientation towards meeting customer needs and expectations, which includes improving their satisfaction.

BME also offers bachelor's and master's degrees, as well as official certifications and licenses through the BME Institute, providing high-quality education that enables employees to make progress with their careers and gain specialist knowledge in their field. The prestige and leadership of the BME Institute are structured around its commitment to Total Quality, which is reflected in:

BME also has a training scholarship and subsidies plan, with a view to promoting and supporting excellence and facilitating access to postgraduate training of the highest quality.

Additionally, and with a view to continually improving its catalog of training and meeting the needs of its clients, BME offers tailored programs that are developed taking into account the flexibility and rigor required to achieve success and excellence in their achievement.

Through the EasyLearn tool, BME employees access mandatory e-learning courses where they receive specific training on Security and Compliance, as well as regulatory training specific to their field of work. Mandatory face-to-face or online workshops are also organized.

BME has imparted new training on workplace bullying, discrimination and sexual harassment. Training on this subject began a few years ago and has since been integrated into the mandatory program for all new recruits. Given the relevance of this topic, in 2024 the decision was made to expand this training to all Group employees. The first sessions for employees who have been at the company for more than 10 years were held throughout 2024 and, gradually, all other staff will be called to take part.

In October, an online course on Criminal Prevention was held for the directors of BME Group companies. This course aims to review the basic concepts related to the criminal



liability of the legal person and prevention models and, most importantly, the BME Group's Criminal Prevention System. In particular, the course covers the structure of the bodies it is made up of, the criminal risks to which the Group is exposed on account of its activity (corruption in business, bribery and influence peddling, crimes against the market and consumers, etc.) and the controls established to mitigate them.

As in previous years, the training provided by BME provides its team with technical knowledge in areas such as ESG,

finance and technology, as well as personal skills such as team management, communication and leadership. 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.

During 2024, 29,676 hours of training were provided (87% up on 2023), which equates to an average of 23.83 hours per employee.

### c) Fringe and other benefits for employees (2-23, 3-3, 401-2)

BME promotes labor flexibility and the reconciliation of a work-life balance between its permanent and temporary employees, on an equal basis, through different 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. The regulation and scope of these benefits are governed by the Collective Bargaining Agreement. Some of these benefits include: scholarships for children, health care insurance, life insurance or retirement bonuses.



**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.** It provides services and offers for employees such as a Benefits Club.

In addition to the mobile app for employees, BME Conecta, using which employees can access a variety of online human resources features and other services as well as offers intended for employee, the Benefits Club, in 2024 BME encouraged corporate volunteering actions with the Food Bank, Caritas, Apsuria, the Prodis Foundation and Save the Children.

As a result of the aforementioned measures, the turnover rate in 2024 was 6.49% compared to 6.1% the previous year. (401-1)

## Commitment to diversity, equality and inclusion (2-23, 3-3)

BME promotes 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 condition or religious beliefs. The basis for establishing a healthy motivating work environment is fair and respectful interaction, free from any forms of discrimination, harassment or retaliation, with this constituting the basis of the Group's values. Thus, all business practices for human resource management are based on the commitment of BME to the equality and diversity of its employees.

In line with this commitment, BME has developed an Equality Plan in line with the strategy of the SIX Group to which it belongs. The Board of Directors at BME is preparing measures for the dissemination and implementation of this Plan, with the expectation that they will be concluded by the end of 2024. BME also has a Joint Equality Commission intended to analyze and implement possible equality-related measures at the Group. In this way, people management practices at BME are governed by its commitment to diversity and equality.

Aware that the responsibility of companies starts with the promotion of good labor practices and the promotion of equality and diversity, at the end of 2021, BME launched the IBEX® Gender Equality Index to promote gender equality in companies listed on the Spanish stock market. Up to 52 companies participated in this initiative up to 2024. This demonstrates the firm commitment of BME to SDG 5 on gender equality, helping to promote this goal at Spanish companies.

As part of the SIX Group, BME is committed to a work environment where diversity and equal opportunities are intrinsic to its activity, regardless of professional category, origin, ethnicity, gender identity, nationality, age, sexual preference, physical condition or religious belief. These principles are the essential pillars of the values that guide the Group and 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 this commitment, the remuneration, promotion and training policies at BME promote the attraction, retention and commitment of employees under criteria of merit and ability 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. In addition, personnel selection procedures guarantee confidentiality, impartiality and equal opportunities.

Additionally, as in previous years, BME has promoted International Women's Day with the Ringing of the Bell for Gender Equality, as part of the "Ring the Bell for Gender Equality" initiative pursued by the World Federation of Stock Exchanges and Sustainable Stock Exchanges in cooperation with the UN Global Compact, UN Women and the IFC. This is the seventh time that BME has participated in the initiative, which saw topics addressed including the percentage of IBEX 35® companies that have a gender equality policy and the percentage of these companies that have set objectives to increase the representation of women in the workforce and on decision-making bodies. Likewise, reference was made to the role that BME plays in this area, highlighting that the development of stock indices and ESG bonds is one of the ways in which BME pursues the Sustainable Development Goals.

Furthermore, BME has celebrated the 10th anniversary of "Women in ETFs" and the launch of the association in Spain. The aim of this partnership is to connect, support and inspire women in the ETFs industry by developing and assisting talent, recognizing the achievements of women in the industry, as well as supporting equality, diversity and inclusion.

It is worth noting that the commitment of BME to diversity and equality goes beyond gender, promoting 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.

One of the priority objectives at SIX is respect for dignity, equality, integrity and other fundamental rights in all its actions and behaviors. With this in mind, the total eradication of situations of discrimination, harassment or bullying in any of its forms in the work environment is a critical issue 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, specifying the available notification channels for the correct reporting and management of these cases. In 2024, as in 2023, there were no incidents related to discrimination or cases of violation 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 reassert its commitment to international human and labor rights, as well as respecting these rights as an employer and supply chain partner, SIX has published a Human Rights Declaration. This statement, approved by

the President and CEO of SIX, covers compliance with the United Nations Guiding Principles on Business and Human Rights (UNGPR), the International Bill of Human Rights and the fundamental norms and principles of the International Labor Organization (ILO). The SIX Human Rights Declaration can be found on its website.

Given no risks were identified in terms of human rights, BME has not signed any significant investment agreement in which clauses relating to human rights have been

included (2-27). As a result of the adequate application of the measures contained in the remuneration policy for BME employees, in 2024, the salary gap in the senior management, middle management and clerical, ancillary and support staff categories fell compared to the previous year.

## Wage gap<sup>28</sup> (405-2)

	2023	2024
Senior management	1.07	0.99
Middle management	1.21	1.04
Specialized staff	1.03	1.06
Administrative / Auxiliary / Support	1.01	0.98

## 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. BME does not have an international health and safety management certification; however, promoting health and safety in the workplace is considered essential. Therefore, in all its work centers, BME implements health, safety and prevention measures pursuant to the Occupational Risk Prevention Law. In addition, annual risk assessments are performed with a view to developing a plan that reduces the risks identified and meets the needs of workers through the implementation of preventive measures. As a result of these actions, in 2024, the frequency rate was 1.80 and the severity rate was 0.10 (in 2023, 1.65 and 0.01, respectively)

To supervise and advise on health and safety programs, both at work centers and at remote stations, BME has set up various committees: the Health and Safety Committee, the Evacuation Team, the Emergency Team and the 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 with risks, in 2024, as in the previous year, no occupational diseases were identified.

<sup>28</sup> 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.

The company offers physiotherapy services, flu vaccination campaigns, first aid kits at all work centers and a nursing service in Las Rozas, complemented by telephone support that facilitates video call consultations at all centers. It also provides annual medical examinations and a medical assistance insurance policy for its employees and their relatives.

In the field of mental health, BME prioritizes the emotional well-being of its employees. With this in mind, in 2023 a psychosocial risk assessment began at all Group companies,

with a view to ascertaining the mental and professional health of its workers. This exercise concluded in 2024 and the corresponding preventive planning will be carried out on a biannual basis. In addition, as part of the SIX Group, the company offers a free and confidential employee assistance program that provides help to address different work and/or personal issues, through professional advice to manage emotional, practical or physical needs.

## Health and safety training (403-5)

To strengthen the health culture, BME ongoing training courses on health and safety as well as information campaigns that highlight these aspects, encouraging all employees to actively participate in promoting a safe and healthy environment. In this context, 565 hours of ORP training were provided to the entire workforce for courses on Occupational Risk Prevention, First Aid and Emergencies (870 in 2023).

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

Furthermore, in collaboration with the Human Resources and Corporate Communication areas, the First Aid Kit Service reports on blood donation campaigns and provides health-related 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 workers. This channel is intended not only for collective bargaining, but also for the resolution of possible conflicts and the involvement of workers in the company's management in terms of information, consultation and participation.

In 2024, BME signed a new Collective Agreement valid for the 2024-2026 period. All BME Group employees who provide their services in Spain (except BME Latam SAS and LATAM Exchanges Data Inc) are subject to said agreement.

In addition, BME has different mechanisms to involve its employees in the company's decision-making, such as meetings with the CEO and senior management at the Group, where business results and the Group's general strategy are communicated, as well as the surveys periodically completed by employees.

## 4.2 Workers in the value chain <sup>(3-3)</sup>

As well as its internal workforce, BME has 288 external employees that support the performance of different activities related mainly to the operation and maintenance of various IT functions. BME also receives support from its supply chain for the acquisition of the necessary products and services to develop its activities. <sup>(2-8)</sup>

Against this backdrop, BME strives to relay its commitment to sustainability to its supply chain, promoting good practices, evaluating its suppliers and incorporating sustainability clauses in contractual relationships. All of this with a view to ensuring respect for the environment and society in general.

### Monitoring indicators for the sustainable value chain



**83% of local suppliers**



**82% of local purchase volume**



**Approval processes for all suppliers that take into account ESG criteria**



**Compliance with all regulations and requirements, with no negative evaluations**

BME suppliers must comply with different quality standards depending on the type of products and services they offer, act with integrity in their business practices and adhere to the regulations that regulate their activity. BME enforces these requirements through specific actions and measures, such as the Goods and Service Supply Control Procedure and the selection and evaluation of suppliers, details of which are provided in this chapter.

BME also has an internal invoice management procedure that sets out how the BME invoice management and authorization system works, from the receipt of the invoice to the corresponding payment and filing.

### Supplier profile <sup>(2-6, 414-1)</sup>

BME Group companies, with the exception of BME Latam SAS and LATAM Exchanges Data Inc., mainly undertake their activity in Spain and prefer suppliers that operate in this country, which implies that purchases, services and billing are carried out at a local (local suppliers). This reflects their commitment to local employment and the sourcing of

local products and services. In this context, in 2024, these companies have registered a total of 792 suppliers, of which almost 80% are local suppliers.

## Suppliers

	2023	2024
Local suppliers	1,237	635
Non-local suppliers	143	123
<b>Total</b>	<b>1,380</b>	<b>758</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).

The implementation of the SAP tool in 2024 has allowed BME to optimize the list of providers to eliminate inactive or duplicate entries, which explains the significant drop in the number of suppliers compared to 2023.

## Purchase volume (204-1, 2-26)

### Billing for services from external suppliers

	2023	2024
Volume invoiced by suppliers (Thousands of euros)	82,655	77,137
Local suppliers (%)	75	81
Non-local suppliers (%)	25	19

## Average payment period to suppliers

As in the previous year, **BME has settled all payments of invoices to suppliers within the maximum legal period established.** In 2024, the average payment period of BME was 34 days (the same as in 2023). As a result, BME complies with the current regulations regarding the

fight against delinquency in commercial operations and corporate governance. This 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

	2023	2024
BME	34	34
Other Group companies*	33	30

\* The other companies belonging to the Group would be the other BME Group companies (Rectoras de Madrid, Bilbao, Barcelona, Valencia, Iberclear, Instituto, Market Data, BME RF, Clearing, MEFF Tecnología, MEFF Rectora, BME Servicios Corporativos, Inntech, BME PTS, Sistemas de Negociación, Sociedad de Bolsas, BME Regulatory, Group Services y Regis-TR).

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

BME has an "Order Authorization System" (SI3), a tool that supports each of the phases of the supply process of products and services, including the initiation, approval,

budgetary control and management of payment orders. This system makes it possible to:

1. Identify and reduce supply chain risks through the supplier's commitment to regulatory compliance in economic, environmental and socio-labor matters;
2. Improve the organization's cost management
3. Establish the origin and geographical location of the product components which makes it possible to reduce the CO2 footprint in the case of local suppliers.

Furthermore, BME has other mechanisms to ensure that the Company's supply chain is managed sustainably and responsibly. In this context, during 2024, 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 2024, specifically, 107 new suppliers signed the statement of compliance (82 in 2023). (414-1)

The risk area at BME monitors suppliers to ensure that they do not pose an additional risk. To do this, they classify suppliers based on their relevance and, depending on their level of risk, they implement a series of controls to mitigate vulnerabilities. No supplier audits were conducted in 2024.

At a Group level, the SIX Supplier Code establishes mandatory guidelines on business ethics and compliance,

as well as labor standards and environmental protection. This code, which is a binding component of SIX supplier contracts, was updated in 2023 to include new sections on corporate governance and ESG aspects. In this context, suppliers are required to comply with all applicable national and international legal obligations, as well as all existing industrial standards or guidelines relating to environmental protection, respect for labor and social standards, and business ethics, compliance and company management. Specifically:

- As regards the environment, suppliers are required to comply with regulations relating to the reduction of the use of resources and emissions, the regulation of substances hazardous to the environment and health, as well as to implement a continuous improvement process in these areas.
- Regarding occupational and social standards, suppliers must adhere to standards such as the International Bill of Human Rights and the OECD Guidelines for Multinational Enterprises. They must also promote a work environment free from mistreatment, persecution or discrimination, and prohibit forced or involuntary labor, in addition to other aspects.
- Finally, regarding business ethics, compliance and governance, suppliers must comply with the applicable local laws, regulations, guidelines and conditions in the countries where they operate. Likewise, they must avoid bribery or corruption practices, protect fair competition, disclose any possible conflict of interest and safeguard confidential information, as well as patents, copyrights and trademarks.

These measures are not an all inclusive list of the requirements that suppliers are required to adhere to. More detailed information about all the guidelines and

applicable regulations can be found on the corporate website (Supplier Code).

## 4.3 Relationship with the community (3-3, 413-2)

The impact of BME on society is reflected in national economic stability, the strengthening of business competitiveness, the creation 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 dissemination of financial knowledge, support for local communities or investment in training and culture. (3-3)

As mentioned in the environmental chapter, the activity of BME does not generate impacts on its surroundings either in environmental or social terms, since its operations are carried out in urban areas where no protected spaces or local communities are affected.

## Positive contribution of BME to society in figures



**Total tax contribution: 112.4 million euros.**



**Braindex and other organizational financial-stock market training initiatives by BME.**



**166,740 euros of investment in patronage and cultural promotion.**

## Generation of a positive socioeconomic impact through Company 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, adding value to the national economy in terms of economic growth and job creation.

In addition, the Group's tax strategy and policy, in line with the best tax practices, contributes to the maintenance and strengthening of the public sector and socioeconomic equality.



**Tax transparency**

	<b>Country</b>	<b>2023</b>	<b>2024</b>
Income from sales to third parties (thousands of euros)	Spain	265,546	267,230
	Germany	-	-
	United States	-	-
	United Kingdom	2,758	3,101
	Luxembourg	25,416	34,809
Income from intragroup transactions with other tax jurisdictions (thousands of euros)	Spain	7,270	30,862
	Colombia	360	341
	United States	-	-
	United Kingdom	462	565
	Luxembourg	2,411	2,823
Tangible assets (thousands of euros)	Spain	71,100	71,117
	Colombia	-	-
	United States	-	-
	United Kingdom	-	-
	Luxembourg	89	117
Profit before tax (thousands of euros)	Spain	104,512	97,422
	Colombia	(39)	(5)
	United States	-	-
	United Kingdom	11	(8)
	Luxembourg	3,903	4,463
Tax benefits (thousands of euros)	Spain	32,709	28,480
	Colombia	-	4
	Luxembourg	997	(1,603)
	United Kingdom	3	7

## Taxes borne and levied in 2024

	2023	2024
<b>TAXES BORNE</b>		
Corporation tax	58%	53%
Social Security (company) <sup>29</sup>	26%	33%
VAT <sup>30</sup>	9%	9%
Other taxes, fees and special contributions	7%	5%
<b>TAXES LEVIED</b>		
VAT	56%	55%
PIT <sup>31</sup>	36%	33%
NRIT <sup>32</sup>	1%	1%
Electricity tax	1%	5%
Social security (employee)	6%	6%

## Corporation tax and levy

	2023	2024
Average BME Group corporation tax rate	26.94%	26.66%
General tax rate	25.00%	25.00%

BME also contributes to generating a positive socioeconomic impact on society by committing to local suppliers that operate in the same geographical location where purchases, services and billing are made. This demonstrates its continued

commitment to local employment and the provision of local products and services (for more information, see chapter "4.2 Workers in the value chain").

## Publication of financial knowledge (203-1, 203-2)

BME promotes the dissemination and teaching of financial knowledge. Due to its significant role in the financial markets, BME, through its educational subsidiary, the BME Institute, is dedicated to promoting financial literacy as part of its

activities. In addition, it adheres to the recommendations and good practices for Financial Awareness and Education established by the Organization for Economic Cooperation and Development (OECD).

<sup>29</sup> Social Security (company): Personnel expenses related to Social Security.

<sup>30</sup> VAT: Value Added Tax.

<sup>31</sup> PIT: Personal Income Tax.

<sup>32</sup> NRIT: Non-resident income tax.

## BME Institute in 2024

The BME Institute is the BME training center and collaborates with the National Financial Education Plan in Spain. It offers training services related to finance and financial markets. 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, anybody interested in acquiring basic or advanced knowledge of the world of finance.

During 2024, the BME Institute further expanded its Braindex course platform, which offers an asynchronous online learning environment. All courses offered by the BME Institute and Braindex are structured around the following thematic pillars: markets and products, technology applied to financial markets and regulation. Thus, BME facilitates the development of society's financial skills, promoting a better understanding of financial products, concepts and risks through the training imparted on its courses.

During 2024, the BME Institute delivered 4,817 hours to 3,760 students across 155 courses. The training courses offered included the **master's degree in Financial Markets and Alternative Investments (MFIA) and the master's degree in Artificial Intelligence and Quantum Computing for financial markets (MIAX)**. Another milestone was the second edition of the BME course on Sustainable Financing for issuers of financial products to finance sustainable projects. Also in 2024, the BME Institute entered into several collaboration agreements with: the Dominican Republic Stock Exchange, Universidad Católica de Bolivia, Universidad Iberoamericana de México, Brain And Code, LWS Academy, Barcelona Finance School, Universidad Autónoma de Madrid, Universidad de Salamanca, Polytechnic University of Madrid and San Pablo CEU University.

By the end of 2024, Braindex had imparted 100 courses across different levels. Around 25% of the courses on Braindex can be accessed free of charge. During 2024, the BME Institute entered into an agreement with the University of Salamanca to add **an audiobook to Braindex**. The audiobook is entitled "The Forest of the Economy" and is aimed at children aged between 6 and 10, written by Esther del Brío. The audiobook is available free of charge on Braindex. This educational project consists of a series of children's stories that teach essential concepts and values linked to the economy, such as the meaning of money, savings, public spending, social services and equal opportunities.

During 2024, the BME Institute continued its **collaboration with numerous universities**, business schools and other institutions. A total of 1,527 students attended free training sessions or visits during 2024. Additionally, 10 monthly stock market webinars were held with the Mexican Stock Exchange (BMV) on basic financial concepts, with more than 1,362 people in attendance in 2024.

As part of the **Financial Education Plan** pursued by the CNMV, the Bank of Spain and the Ministry of Economy, Commerce and Business, BME offers annual webinars on Financial Literacy Day (first Monday in October). The topic in 2024 was "Digital Finances".

BME awards **prizes to the winners of the Economics Olympics tournament** in Valencia, which public universities promote among high school students. BME also supported the Spanish Finance Association (AEFIN) by handing out three awards at the Finance Forum.

In collaboration with Madrid City Council, the BME Institute participated with an **Open Book** in Madrid. This educational program provides access to educational institutions to promote advanced teaching methods beyond conventional classroom learning. The participation of the BME Institute covers an introduction to the fundamentals of financial markets. The course is designed to familiarize students with the fundamentals of the stock markets and how they work. During 2024, 29 sessions were held for 23 schools and 714 students.

The BME Institute also organized **courses for the Guardia Civil and the General Council of the Judiciary**.

### Palacio de la Bolsa, Madrid

Madrid's Retiro Park, the Royal Botanical Garden and Paseo del Prado form part of the Paisaje de la Luz district, home to an exceptional concentration of museums, cultural centers and spaces dedicated to the arts and sciences. The Palacio de la Bolsa in Madrid, home to the city's stock exchange, is one of the district's most important landmarks and has been designated a World Heritage Site by UNESCO as part of the Prado-Recoletos axis and the Paisaje de la Luz project. During 2024, the historic building recorded more than 3,773 visits from schools, educational centers, cultural groups and the general public.

## Financial education

In addition, the BME Research Service is responsible for preparing, filtering, selecting and distributing statistics from the BME Group's markets and systems as well as drawing up reports and documentation on the status of national and international financial markets. Thus, the financial disclosure activity of BME facilitates the development of the financial skills in society, promoting a better understanding of financial products, concepts and risks, through training,

instruction and advice. Thus, BME actively contributes to the sustainable growth of the companies' businesses and to the improved protection of investors' rights. To achieve these objectives, the financial disclosure of BME revolves around four main pillars:

### Financial education

- BME regularly collaborates in the organization and development 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 Insurance and Funds Pensions 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.
- Participation in the Stock Market session with the commemorative Bell Ringing at the Madrid Stock Exchange, with representatives from Madrid City Council and IOSCO and in attendance. This event was part of the “Ring the Bell for Financial Literacy” initiative promoted by the World Federation of Exchanges (WFE) and IOSCO as part of World Investors Week.
- Participation with the Madrid City Council in the “Madrid, an open book” program, open to baccalaureate, basic vocational training and intermediate vocational training students.
- Development of the “Stock Market World” Module, through which young people acquire the basics in relation to the financial markets, focusing on the equity market. In 2024, a total of 29 sessions were held for 23 schools and 714 students.
- Regular collaboration with initiatives aimed at retail investors such as The Stock Market Contest, which seeks to familiarize participants with how financial markets work, organized each year by El Inversor Inquieto, Andbank, MyInvestor and the María Jesús Soto Foundation.

## **Symposiums, fairs and other activities related to the stock market**

- Annual Assembly of the UN agency Global Compact.
- Spanish Mid & Small caps: performance in sustainability and opportunities in sustainable financing”, which is also organized by BME and EthiFinance.
- Cooperation with EthiFinance to organize the “Spanish Mid & Small caps: performance in sustainability and opportunities in sustainable financing”.
- Organization, in cooperation with Renta 4, of the “First Meeting with Retail Investors”, offering the opportunity to bring retail investors closer to the activity and business model of the main Basque listed companies, explore their growth potential and future prospects.
- Participation in StartupOlé and the round table “Alternative financing: Exploring the risk capital and SME markets”, demonstrating the advantages offered of being part of the BME Pre-Market Environment | Spanish Stock Exchanges and Markets and how this program is responsible for accelerating the incorporation of all types of companies into the Stock Market. This was explained in the reverse pitch, a space reserved for corporations and investors to present their visions and value propositions to entrepreneurs.

## **Financial awards in 2024**

- 30th AEFIN Finance Forum.
- Prize to the winners of the Economics Olympics Tournament in Madrid.
- OFISO 2024 awards, in recognition of the excellence or performance in terms of sustainable financing.
- 31st AEFIN Finance Forum.

## Financial-stock market training

- Brainindex, 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.
- 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.
- Collaboration on the 2nd edition of the educational contest: “Listed companies reinvent themselves” to promote financial culture and the development of sustainable finances.

## 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)

At BME, we understand that the progress and well-being of our community is critical to long-term success and sustainability.

The commitment of BME to supporting the community, especially in the cultural sphere, is reflected in our continuous collaboration over the years with the Fundación Amigos del Museo del Prado in Madrid, of which BME is a member, as well as being a patron of the National Archaeological Museum and trustee of the Guggenheim Museum in Bilbao.

Our collaboration is also aimed at supporting projects that seek to promote social inclusion and general well-being.

To this end, BME maintains a commitment dating back years with initiatives like “Light for ALS”, promoted by the Luzón Foundation, in addition to others.

In addition to the collaboration of BME with the Luzón Foundation, it also collaborates with the Women Foundation, with donations of €4,000 and with the Conscious Capitalism Foundation, with a donation of €3,000. BME also donated €20,000 to the Save the Children Foundation. BME has donated €340,085 to the Juan XXIII Foundation as part of the alternative measures of the General Law on the Rights of Persons with Disabilities

At BME, we believe that our actions should reflect our values and principles and we will continue striving to contribute to local development.

## Financial investment by BME intended to benefit the community

(THOUSANDS OF EUROS)

	2023	2024
Patronage and cultural promotion	151.01	166.74
Donations	12.0	31.0
Socioeconomic development (Awards)	3.6	3.6

## Support and membership of associations <sup>(2-28)</sup>

	Holds positions <sup>33</sup>	Participates in a project <sup>34</sup>	Is a member <sup>35</sup>
<b>NATIONAL ASSOCIATIONS AND INSTITUTIONS</b>			
Alastria	NO	NO	YES
Association of Venture Capital & Private Equity Entities (SPAINCAP)	-	-	YES
Spanish Issuers	-	YES	YES
Association of electronic companies, IT, Telec. (AMETIC)	-	-	YES
Spainsif	NO	YES	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 Exchanges (SSE)	-	-	YES
United Nations Global Compact	NO	YES	YES

<sup>33</sup> 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.

<sup>34</sup> Associations or institutions in which any of the BME Group companies participate in their projects or their committees.

<sup>35</sup> Associations or institutions in which one of the companies of the BME Group considers that being a member responds to a strategic decision.

## 4.4 Clients and end-users

The clients and end users of BME are, mainly, entities supervised by the CNMV, constituting one of the most significant stakeholders for the Company. For this reason, BME facilitates different communication channels to maintain a transparent and professional relationship, offering a high-quality service as well as a wide range of training activities that promote informed and responsible action.

When it comes to individual investors, BME offers the figure of the Investor Protector, tasked with addressing and examining complaints, claims and challenges related to operations on the Madrid, Barcelona, Bilbao and Valencia Stock Exchanges. This person is responsible for analyzing the actions of market members, entities receiving orders, issuers of securities and other participants, and promotes an environment that facilitates the clarification of facts and doubts, in addition to intermediation between the parties involved.

In relation to the complaints and claims systems, although BME does not have a centralized Customer Service (SAC), it offers contact channels to its stakeholders, clients and users in the form of emails and specific telephone numbers for each legal entity.

To this end, in 2024 the following complaints were filed:

LEGAL ENTITY	Claims or complaints received	Claims or complaints managed
BME Equities	0	0
BME Fixed Income	0	0
MEFF	0	0
BME Market Data	0	0
BME Growth	1	1
BME Inntech	0	0
BME Regulatory Services	0	0
Iberclear	1	1
BME Clearing	1	1
Regis-TR	2	2
Financial Services Spain	0	0
<b>TOTAL</b>	<b>5</b>	<b>5</b>

To improve its client management process, on March 30, 2023, a "Know Your Client" (KYC) Due Diligence process was implemented for the communication and review of information presented by Iberclear participants and the clearing members of BME Clearing. This process is performed during the onboarding process, as well as throughout the business relationship in the form of periodic reviews, using a risk-based approach; it applies to both new and existing participants and members.

When it comes to data protection, BME complies with Regulation (EU) 2016/679 and other applicable local regulations on the protection of personal data. The company has internal policies and procedures in place that cover privacy from the design process, information confidentiality and security, the management of security breaches and the exercise of rights of data subjects. To ensure compliance, BME performs periodic controls and external audits, maintaining an updated record of its personal data processing activities. In 2024, an independent external audit was carried out on data protection, the scope of which encompasses BME Group companies located in Spain. The Business Units and Corporate Functions have actively participated in the audit and in the contribution of the evidence requested by the auditor. The external audit detected no findings or need for corrective actions, with only a number of recommendations for improvement indicated, mainly in the areas of transparency and registration of processing activities. The audit report concluded that there was a high level of compliance at the BME Group in terms of data protection, with a Data Protection Model based on governance and continuous improvement, as well as a culture of compliance in terms of data protection. The plan to implement recommendations from the external audit began in June.

As a result of these efforts, in 2024, as in 2023, there were no complaints related to privacy or personal data leaks involving employees, contacts and clients of the BME Group.



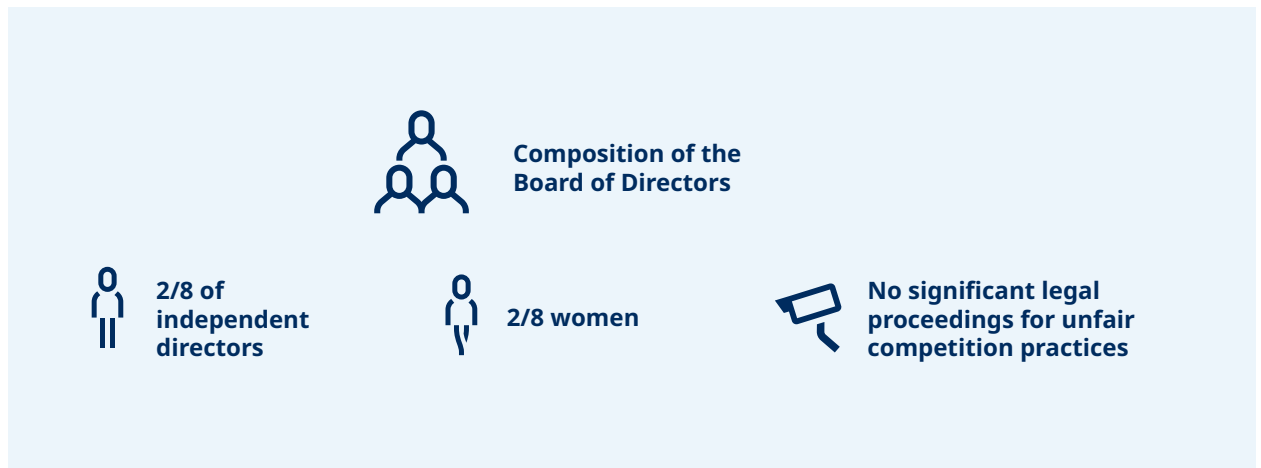
# 5. Responsible governance (2-23)

As the market operator for the Spanish financial markets and systems, BME must set an example for companies, issuers and investors in matters of good governance, transparency, ethics and regulatory compliance. To this end, not only does it have the necessary tools, it also builds these principles into its very nature and applies them throughout its entire value chain.

In each of its activities, BME is supported by a responsible management framework, made up of corporate codes, policies and procedures that guide the actions of all the

professionals who represent the company. Between the merger of BME into SIX and 2022, this responsible management framework was progressively harmonized with the compliance policies, procedures and tools at SIX, thus consolidating the integration process between both companies.

## The BME Group and responsible management in figures



## a) Governance bodies at BME (2-9, 2-11, 405-1)

At December 31, 2024, the Board of Directors, the highest governance and administrative body at BME, comprised 8 members of recognized capacity, honor and independent criteria. The professional profiles of Board members, available on the corporate website, [www.bolsasymercados.es](http://www.bolsasymercados.es), include details about the positions and functions they perform both at BME Group companies and other

organizations outside the Group. External proprietary directors, who make up 50% of the Board, represent the sole shareholder of BME Holding, which is SIX Exchange Group AG. This, in turn, is wholly owned by SIX Group AG, the legal person that holds 100% of the Company's share capital. (2-13)

## Board of Directors at December 31, 2024

Directors	Board position	Character	Seniority on the Board	Commissions	
				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	-	-
Mr. Juan Ramón Flames Omarrentaría	Chief Executive Officer	Executive	15.11.2024 <sup>36</sup>	-	-
Ms. Marion Leslie	Director	External proprietary <sup>37</sup>	30.07.2020	-	-
Ms. Belén Romana García	Director	Director	30.07.2020	Chairwoman	Director
Mr. Daniel Schmucki	Director	External proprietary <sup>37</sup>	18.06.2020	Director	-
Mr. Bjørn Sibbern	Director	External proprietary <sup>37</sup>	25.10.2024	-	-

Secretary of the Board and of the Committees: Ignacio Gómez Sancha Trueba (since July 1, 2023)

Vice-Secretary of the Board and of the Committees: Ms. Cristina Bajo Martínez (since December 20, 2007)

In terms of diversity, 25% of the Board of Directors of BME is female, which is in line with its best corporate governance practices.

## BME Board of Directors members by gender and age at December 31 each year

	2023	2024
Women	2 (33%)	2 (25%)
Men	4 (66%)	6 (75%)
< 30	0 (0%)	0 (0%)
30 - 50	0 (0%)	2 (25%)
> 50	6 (100%)	6 (75%)

<sup>36</sup> Pending entry in the Comercial Register.

<sup>37</sup> Represents SIX EXCHANGE GROUP AG.

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

During 2024, an online course on Criminal Prevention was held for BME directors, with 100% of directors in attendance. This course aims to review the basic concepts related to the criminal liability of the legal person and prevention models and, most importantly, the BME Group's Criminal Prevention

System. In particular, the course covers the structure of the bodies it is made up of, the criminal risks to which the Group is exposed on account of its activity (corruption in business, bribery and influence peddling, crimes against the market and consumers, etc.) and the controls established to mitigate them. Additionally, as in previous years, BME directors have also received continuous training at meetings of the Board of Directors and its Delegate Committees, at which the most relevant financial and non-financial issues for the company are discussed. (205-2)

For more information on corporate governance, consult the Corporate Information section of the BME website.

## b) Organization of BME

The Board of Directors at BME Holding delegates the executive management of its businesses to the BME Holding Management Committee, which ensures the alignment and coordination of the BME Group with the recommendations of the Business Unit and the Corporate Area of the SIX Group, of which it forms part. It also guarantees direct coordination in the management of the BME Group companies regarding matters and initiatives that exclusively affect these companies.

The BME Holding Management Committee is also responsible for promoting, directing and supervising issues of particular relevance to the Company. On this committee, the figure of the CEO is worth particular note; they act as the senior-most executive at BME and assumes responsibility for the management of the Company's core business, with full executive functions. The other members of the Management Committee report hierarchically to the CEO. (2-11)

## Executive Board at December 31, 2024

Member of Executive Board	Position
Mr. Juan Ramón Flames Omarremataría	CEO and CEO and Head of Exchanges
Ms. Marta Bartolomé Yllera	Chief Financial Officer
Mr. José Manuel Ortiz Repiso Jiménez	Head of Clearing
Mr. Jesús Benito Naveira	Head of of Settlement and Registration
Ms. Berta Ares Lombán	Head of of Value Added Services
Mr. Ignacio Olivares Blanco	Head of Advisory Director
Mr. Arturo Merino Ginés	Head of IT
Mr. Pablo Malumbres Mugerza	Head of Corporate Communications and Public Affairs
Mr. Jorge Yzaguirre Scharfhausen	Deputy Head of the SIX Securities Services Business Unit
D <sup>a</sup> Luisa Martínez Abasolo	Head of Human Resources

## Members of the BME Management Committee by gender and age at December 31 each year

	2023	2024
Women	3 (30%)	3 (30%)
Men	7 (70%)	7 (70%)
< 30	0 (0%)	0 (0%)
30 - 50	2 (20%)	3 (30%)
> 50	8 (80%)	7 (70%)

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

The remuneration of the directors and senior management is established pursuant to the Directors' Remuneration Policy of BME and the BME Group's Remuneration Policy, respectively.

The Directors' Remuneration Policy is transparent and is proportionally adjusted to the relevance of the Company, its economic situation and the market standards of comparable companies. It is also aligned with the business strategy, values and long-term interests of the Company, promoting the profitability and sustainability of BME. The policy seeks to attract, retain and engage the most qualified professionals.

Based on this Policy, BME directors receive a fixed remuneration for the performance of their duties as well as allowances to attend meetings.

The SIX Group's Remuneration Policy regulates the remuneration of senior management and applies both to BME employees and Group company employees, as well as to members of the administrative bodies at the BME Group who, serving executive functions, have suspended their employment relationship with any of these companies.

## Average remuneration of Directors and Senior Management at BME by gender<sup>38</sup>

(THOUSANDS OF EUROS)

	2023 <sup>39</sup>	2024
<b>Directors</b>	<b>252</b>	<b>275</b>
Women	80	80
Men	338	353
<b>Senior management<sup>40</sup></b>	<b>387</b>	<b>440</b>
Women	369	443
Men	396	439

38 The average remuneration of directors and senior management at BME contained in this table includes all remuneration items received by the directors, both in their capacity as such and for the executive functions they perform at BME, and members of senior management (including per diems, any other remuneration received and the estimate or target variable remuneration for 2024; severance pay is not included so as not to distort the average, and the total figures are not provided for reasons of confidentiality). To calculate the average remuneration paid to senior management, the number of days that the person belonged to BME's senior management 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 consideration.

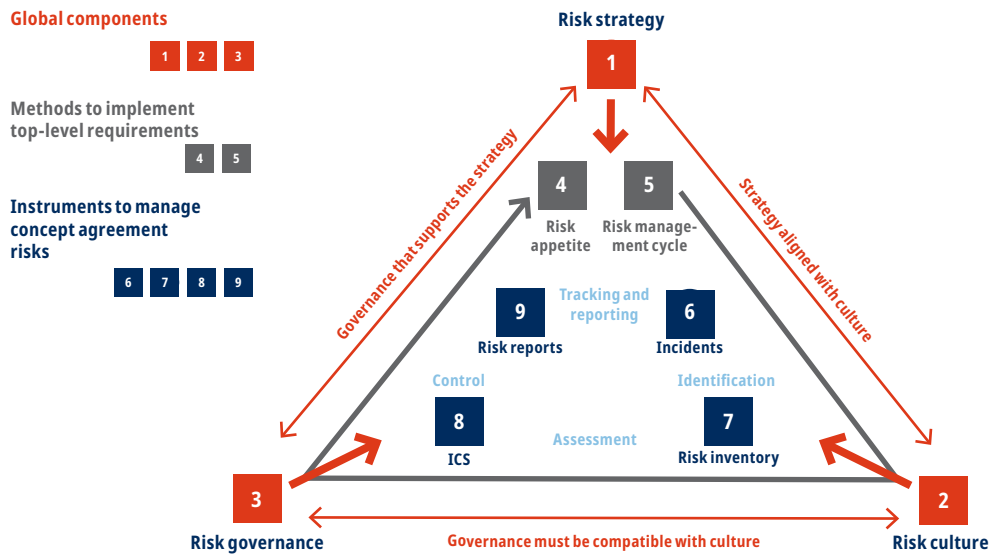
39 The average remuneration of directors in 2023 has been restated as the previous calculation did not include the total number of directors, rather the number of directors who received remuneration.

40 The average remuneration received by senior management includes the remuneration of the CEO as a member of senior management; however the remuneration of the head of internal audit is excluded, as no senior management contract is in place to cover this position.

## 5.1 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 encompasses and connects all the essential elements to thoroughly manage these risks, making it a core and integrated part of the Company's business.

This framework includes Risk Culture, Risk Strategy, and Risk Governance. All the methodological aspects required to manage risks in a uniform and proactive manner, such as identification, evaluation, control, monitoring and reporting of risks, are built into this framework.



### Risk Culture

In this context, Risk Culture, which encompasses all standards, attitudes and behaviors related to risk management, represents an essential component of both corporate culture and risk management. The commitment and leadership of senior management, combined with transparent communication, form the basis of this Risk Culture. To enhance it, regular awareness training is imparted across the organization, and employees are

encouraged to actively promote risk culture in their areas of responsibility, as well as to continually improve and update their knowledge.

Ensuring compliance with the risk appetite defined and encouraging open dialogue on risk-related issues across all levels are core elements of the Risk Culture at BME.

## Risk strategy

The Group pursues a risk management strategy aimed at minimizing any risk that is not aligned with the corporate purposes. This strategy establishes the core components that guide the design of risk management methods, processes and instruments.

The risk management framework clearly and uniformly defines the level of risk tolerance accepted by the business units and corporate functions. The first and second lines

of defense establish the risk tolerance limits for BME, and the Risk team supervises compliance with the thresholds defined and monitors the company's risk profile over time. Ensuring compliance with the risk tolerance level and encouraging open dialogue on risk-related issues at all levels are a core part of the risk culture at BME.

BME uses different risk management instruments, such as:

- **Register of Risk Events:** a database that documents materialized risks resulting from flaws or shortcomings in internal processes, people or systems or external incidents.
- **Risk inventory:** offers a consistent and harmonized vision of the BME Group's risk panorama. Both newly identified and pre-existing risks are periodically analyzed in terms of their criticality, probability and impact before being ranked based on their relevance.
  - Financial risks include the risk of non-payments, lack of liquidity and fluctuations in market prices and exchange rates.
  - Non-financial risks include strategic project risks, IT and security risks, legal and regulatory compliance risks, as well as operational risks including the possible loss of talent.
- **Internal Control System:** encompasses all the control processes required to achieve business objectives and ensure the proper functioning of the BME Group, guaranteeing its adequacy, effectiveness and reliability. This control system was revised in 2024.
- **Risk reports:** these contain updated, clear and reliable information to back up the decision-making process.

Security and risk management is continuously optimized, thus ensuring that risk management approach at BME fully complies with external requirements, in particular regulatory provisions.

## Risk governance

Concerning responsibility for risk management, BME has implemented a three lines of defense model, aligned with standard practices in the financial sector. This model is structured as follows:

- **First line of defense:** business units and corporate functions, responsible for identifying and evaluating risks in the performance of their daily activities.
- **Second line of defense:** the Continuity and Risk Committee, which reports to the Management Committee at BME. This committee is responsible for monitoring and analyzing the risks identified, as well as informing the Board of Directors, through the Audit and Risk Committee, about the actions undertaken in the performance and implementation of the risk management and control policy. It is also responsible for supervising the application and operation of the risk assessment model defined by the Management Committee.
- **Third line of defense:** although the BME Risk Management Framework extends to all BME Group staff, this last line of defense is made up of the following key stakeholders:
  - **Board of Directors:** defines the risk control and management policy, including tax risks, as well as supervising the information management and control systems to ensure that the main risks are appropriately identified, managed and communicated. This supervision is performed at least once a year.
  - **Audit and Risk Committee:** supervises the effectiveness of the internal control and risk control systems, including tax risks. It also ensures the proper functioning of the external and internal audit services and oversees regulatory compliance at the Group.
  - **Internal Audit Department:** submits information to senior management and the Board of Directors (through the Audit and Risk Committee) that contributes to the fulfillment of the organization's objectives. It also analyzes and evaluates the effectiveness of risk assessment activities, proposing improvements when it comes to the effectiveness of risk management, control and governance processes by identifying key risks and controls.

This structured approach aligned with governance standards contributes to solid risk management at BME.

## 5.2 Business conduct (2-24, 2-25, 2-27)

BME seeks to responsibly and sustainably maximize the performance of all its assets, as part of its commitment to

setting the benchmark in the economy of Spanish and Latin American companies. Its principles of action are:

- **Efficiency**
- **Integrity**
- **Impartiality in relation to contracting**
- **Transparency and fairness**
- **Innovation and technological leadership**
- **Training**
- **Protection of investors**

As the manager of Spain's financial markets and systems, BME channels savings toward the financing of companies,

providing the markets it manages with speed, reliability, transparency, efficiency and security.

### a) Legal compliance (2-26, 2-27)

Since 2022, **BME has applied 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. This code includes guidelines such as promoting the stability and attractiveness of financial centers, legal compliance, reporting inappropriate conduct, and sanctions for breaches of the code.

The SIX Code of Conduct also defines mechanisms for employees to report inappropriate conduct in the workplace, thereby protecting the group from potential risks. To this end, several channels of communication have been set up, such as the BME Regulatory Compliance department inbox, face-to-face meetings with this department and the internal BME Integrity Line platform.

In 2023, BME adapted its whistleblowing system to the formal and technical requirements of the Whistleblower Protection Law, implementing the [BME Reporting System](#). This channel allows for irregular or inappropriate conduct to be reported as well as actions or omissions that may involve legal or internal violations and cases of discrimination or workplace harassment. This system is available to employees, clients, suppliers and other interested parties in a work or professional context.

During 2024, 8 complaints were accepted for processing via the Internal Complaints Channel at BME, 3 related to situations of harassment. As was the case in 2023, in 2024, there were no cases of discrimination, violations of human rights nor cases of corruption, bribery and fraud. (2-26, 205-3)

To strengthen regulatory compliance, BME introduced the "Col Tool" in 2023 for the management of conflicts of interest. This tool allows employees to report gifts, entertainment and external employment, in line with corporate policies on conflicts of interest.

In addition, BME has implemented a Criminal Risk Prevention Model based on the company's principles for the prevention of criminal risks. This model includes general and specific preventive controls to manage and mitigate possible criminal risks in its activities, such as money laundering, terrorist financing, fraud, corruption and bribery.

To ensure compliance with the Criminal Risk Prevention Model and follow up on issues related to fraud, corruption and bribery, BME has created the following bodies:



- **Crime Prevention Committee:** body that answers to the Audit and Risk Committee, with autonomy to exercise initiative and control functions. This committee is responsible for supervising the effectiveness of the internal controls implemented at the BME Group and for monitoring the measures adopted to prevent crime risks. In addition, it must periodically report to the Audit and Risk Committee on the activities carried out and, if necessary, propose to this Committee, if necessary, the precise improvements or updates in the controls and procedures of the Criminal Prevention System.
- **Audit and Risk Committee:** Tasked with supervising the Crime Prevention System and submitting to the Board of Directors, for its approval, proposals to amend the Criminal Risk Prevention Manual. It also reports any action undertaken in response to criminal breaches or non-compliances to the Board.
- **Internal Audit Department of the Company:** 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:** Tasked with performing the annual assessment of the Criminal Prevention System, periodically reporting to the Criminal Prevention Committee about its actions and the functioning of the established controls. Its aim is to verify that controls, measures and procedures are up to date and reasonably adequate to mitigate criminal risks.

## b) Transparency (2-26)

In line with its values, BME has reasserted its commitment to transparency, both in its operations on the financial markets and in the disclosure of financial and non-financial information.

At an operational level, BME promotes transparency and independence, respecting free market rules and promoting fair competition. The company also endeavors to avoid any misleading or derogatory advertising toward its competitors or third parties. It should be noted that in 2024, BME faced no significant legal proceedings for unfair competition, monopolistic or anti-trust practices. (206-1)

In this context, BME provides investors with easy access to clear, reliable and updated information, allowing them to make informed decisions and contributing to the stability of the economy.

BME also promotes transparency through the disclosure of financial and non-financial information. The company publishes various reports, studies, articles and statistics related to financial markets on its corporate website, in

addition to stock market reports that can be consulted on a daily basis. Regarding non-financial information, although BME is subject to Law 11/2018 that requires the publication of the Non-Financial Information Statement, the company started to voluntarily report its environmental, social and governance performance in 2008.

In terms of tax transparency, BME supports its business strategy and its commitment to the social interest by fulfilling its tax obligations transparently, in good faith and with loyalty. The company avoids undertaking operations for which there is no business justification or in territories considered tax havens, except those strictly related to the undertaking of its business activity. (207-1)

## c) Cybersecurity

Continued technological progress represents a major growth opportunity for BME, allowing it to explore new business opportunities and improve the quality and efficiency of its services. However, this progress also entails certain risks, and the Company is aware of the growing exposure to potential technological threats. The 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 protected against any type of cyber risks.

Cybersecurity has become one of the vital pillars in the financial market management of BME, constituting a core strategic component for the company. In collaboration with SIX, BME has updated its comprehensive cybersecurity strategy for 2024-2027, with a view to making it even more ambitious than the previous strategy to guarantee the integrity of its computer systems.

With this in mind, and in line with the commitment of BME to cyber resilience, the company continues to perform extensive research into the benefits offered by emerging

technologies, such as artificial intelligence and quantum computing.

In addition, within the framework of the DORA regulation (Digital Operational Resilience Act), which aims to strengthen digital resilience and cybersecurity in the financial sector, the Group's security and governance policies are in the process of being updated, while the security framework and relations with ICT (Information and Communication Technologies) service providers are being improved.

Likewise, as part of its Information Security Management System, BME has established a Security Policy aimed at protecting its information and computer systems against threats and risks of filtration, such as cyberattacks, intrusions, fraud, sabotage and industrial espionage. This policy, and the policies mentioned below which aim to define general principles and establish specific rules for appropriate use in the different services, are in the process of being updated:

- **Software Security Policy:** The aim of this policy is to protect information and computer systems 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 Business Continuity Policy.
- **Information Security Policy:** Its purpose is to prevent the improper use of computer tools. This is achieved by identifying prohibited and permitted conduct, describing the consequences of abusive use and the control procedures that the Company's Management must adopt.
- **Business Continuity Policy:** This policy encompasses the technical and organizational initiatives required to guarantee the operation of BME in the event of serious security incidents. As part of this framework, BME has approved both the Business Continuity Plan and the Reduced Business Continuity Plan. Additionally, BME Group companies, such as Iberclear and BME Clearing, have their own Business Continuity Policies.
- **Physical Security Policy:** This policy is described in the Physical Security Plan, which includes the security measures implemented by BME to protect its facilities. Particular attention is paid to the areas where data processing centers are located, which house computer equipment and information processing and storage systems.

The enhanced security framework and relations with ICT service providers are also in the process of being updated.

## d) Relations with the public administration (201-4, 415-1)

Given the crucial role that the operations undertaken by BME play in the proper functioning of the financial markets and, therefore, in the economic panorama of Spain, it is essential that the entity maintains fluid and constant communication with government authorities. 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 principles of independence and transparency that characterize BME, the company positions itself as an ally of the public administration for the provision of services and to obtain financing. In this context, 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 that governs the activity of BME, as market infrastructure and provider of financial services.

Additionally, in recent years, BME has admitted to listing various green, social and sustainable bonds issued

by entities such as the ICO, the Kingdom of Spain, the Basque Government or the Community of Madrid, thus making it possible for financing to be obtained linked to environmental, social and governance objectives.

In addition, and as detailed in the environment chapter of this report, BME, through Iberclear, is responsible for the National Emission Rights Registry, offering support to the National Emission Rights Administrator.

In 2024, as was the case in 2023, BME did not make any donations to governments, political parties or organizations, thus maintaining management independence in its relations with government entities, at local, regional and national level.

The amount of financial aid received by BME in 2024 within the framework of the employment training system managed by the State Foundation for Employment Training, in the form of bonuses in the payment of Security Social contributions, came to a total of €4,155.00.

## ANNEX I. ADDITIONAL SUSTAINABILITY INFORMATION

### Distribution of employees by gender, geographical area, age and professional category<sup>41</sup>

#### Employee workforce by gender by December 31st of each fiscal year (2-7, 405-1)

	2023	2024
Women	335	358
Men	607	675
<b>Total</b>	<b>942</b>	<b>1033</b>

#### Employees by geographical area and gender by December 31st of each fiscal year (2-7, 405-1)

	2023	2024
<b>Madrid (Spain)</b>	<b>827</b>	<b>915</b>
Women	298	320
Men	529	595
<b>Barcelona (Spain)</b>	<b>76</b>	<b>85</b>
Women	21	24
Men	55	61
<b>Bilbao (Spain)</b>	<b>21</b>	<b>19</b>
Women	9	8
Men	12	11
<b>Valencia (Spain)</b>	<b>13</b>	<b>10</b>
Women	5	4
Men	8	6
<b>Bogota (Colombia)</b>	<b>5</b>	<b>4</b>
Women	2	2
Men	3	2
<b>Total</b>	<b>942</b>	<b>1033</b>

<sup>41</sup> HR quantitative data does not include employees of foreign REGIS-TR Group companies and for Miami as it is outside the perimeter.

## Employees by gender, age and professional classification by December 31st of each fiscal year <sup>(405-1)</sup>

	2023			2024		
	Men	Women	Total	Men	Women	Total
<b>Breakdown by professional category</b>						
Chief Executive Officer	1	0	<b>1</b>	1	0	<b>1</b>
Senior management	6	3	<b>9</b>	6	2	<b>8</b>
Middle management	39	25	<b>64</b>	38	24	<b>62</b>
Specialized staff	377	229	<b>606</b>	408	239	<b>647</b>
Administrative / Auxiliary / Support	185	78	<b>263</b>	223	93	<b>316</b>
<b>Breakdown by Age Group</b>						
<30	85	36	<b>121</b>	93	38	<b>131</b>
30-50	342	191	<b>533</b>	383	202	<b>585</b>
>50	180	108	<b>288</b>	199	118	<b>317</b>

## Annual average contracts by contract type, gender, age and professional category<sup>41</sup>

### Average employees by contract type, gender, age and professional category<sup>35 36 (2-7)</sup>

	2023			2024		
	Men	Women	Total	Men	Women	Total
<b>Annual average of permanent contracts by gender, age and professional category</b>						
Senior management	6.50	3.00	<b>9.50</b>	6.42	2.92	<b>9.33</b>
Middle management	39.67	24.33	<b>64.00</b>	39.67	24.42	<b>64.08</b>
Specialized staff	356.92	220.67	<b>577.58</b>	402.17	233.75	<b>635.92</b>
Administrative / Auxiliary / Support	174.75	73.08	<b>247.83</b>	198.67	82.17	<b>280.83</b>
< 30	75.42	34.42	<b>109.83</b>	87.42	33.83	<b>121.25</b>
30-50	331.25	183.58	<b>514.83</b>	370.42	198.25	<b>568.67</b>
> 50	171.17	103.08	<b>274.25</b>	189.08	111.17	<b>300.25</b>
<b>Annual average of temporary contracts by gender, age and professional category</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	0.25	0	<b>0.25</b>	0.25	0	<b>0.25</b>
Administrative / Auxiliary / Support	8.42	4.00	<b>12.42</b>	5.42	2.08	<b>7.50</b>
< 30	8.42	3.00	<b>11.42</b>	3.92	2.08	<b>6.00</b>
30-50	0.25	1.00	<b>1.25</b>	1.75	0	<b>1.75</b>
> 50	0	0	<b>0</b>	0	0	<b>0</b>

<sup>42</sup> Annual average contracts, both permanent and temporary, were calculated as the average of permanent/temporary contracts each month throughout each year.

<sup>43</sup> In 2024, there were no part-time workers and all full-time contracts were permanent.

## Number of contracts by contract type

### Permanent employees by contract type <sup>(2-7)</sup>

	2023	2024
Full-time contract	942	1033
Part-time contract	0	0
<b>Total workforce</b>	<b>942</b>	<b>1033</b>

## Number of in-house employees, subcontracted workers and the local hiring of employees

### Hired and subcontracted staff <sup>(2-8)</sup>

	2023	2024
<b>Recruited employees</b>	<b>942</b>	<b>1033</b>
Subcontracted employees	301	298
<b>Local hiring of employees and managers</b>	<b>100%</b>	<b>100%</b>

## Number of employees with disabilities<sup>44</sup>

### Employees with a disability by professional category<sup>45</sup> <sup>(405-1)</sup>

	2022	2024
Senior management	0	0
Middle management	0	0
Specialized staff	6	7
Administrative / Auxiliary / Support	1	1
<b>Total workforce</b>	<b>7</b>	<b>8</b>
<b>Employees with disabilities with a permanent contract</b>	<b>100%</b>	<b>100%</b>

<sup>44</sup> All the BME Group 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.

<sup>45</sup> Average number of employees with a disability greater or equal to 33%<sup>(\*)</sup>

## Number of employee recruitments and terminations by gender, age and geographical area<sup>46</sup>

### Employee recruitments and terminations by gender, age and geographical area

	Employee recruitments		Employee terminations	
	2023	2024	2023	2024
<b>Gender Breakdown</b>				
Men	90	122	43	54
Women	38	38	26	17
<b>Breakdown by Age Group</b>				
< 30	11	13	18	17
30-50	115	146	25	33
> 50	2	1	15	21
<b>Breakdown by Geographical Area</b>				
Madrid (Spain)	117	149	46	62
Barcelona (Spain)	11	11	8	2
Bilbao (Spain)	0	0	4	2
Valencia (Spain)	0	0	0	3
Bogota (Colombia)	0	0	0	1
<b>Total workforce</b>	<b>128</b>	<b>160</b>	<b>58</b>	<b>71</b>

<sup>46</sup> 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>(401-1)</sup>

	2023	2024
<b>Gender Breakdown</b>		
Men	14.83%	18.26%
Women	11.34%	10.70%
<b>Breakdown by Age Group</b>		
< 30	9.09%	9.85%
30-50	21.58%	25.35%
> 50	0.69%	0.32%
<b>Breakdown by Geographical Area</b>		
Madrid (Spain)	14.15%	16.45%
Barcelona (Spain)	14.47%	13.10%
Bilbao (Spain)	0.00%	0.00%
Valencia (Spain)	0.00%	0.00%
Bogota (Colombia)	0.00%	0.00%
<b>Total Workforce</b>	<b>13.59%</b>	<b>15.64%</b>

## Turnover rate (%)<sup>47</sup> <sup>(401-1)</sup>

	2023	2024
<b>Gender Breakdown</b>		
Men	7.08%	8.08%
Women	4.48%	4.79%
<b>Breakdown by Age Group</b>		
<30	14.88%	12.88%
30-50	4.69%	5.73%
>50	5.21%	6.67%
<b>Breakdown by Geographical Area</b>		
Madrid (Spain)	5.56%	6.84%
Barcelona (Spain)	10.53%	2.38%
Bilbao (Spain)	19.05%	10.53%
Valencia (Spain)	0.00%	30.00%
Bogota (Colombia)	0.00%	50.00%
<b>Total Workforce</b>	<b>6.16%</b>	<b>6.49%</b>

<sup>47</sup> 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 lay-offs by gender, age and professional category

### Number of dismissals by gender, age and professional category

	2023	2024
<b>Breakdown by gender</b>		
Women	0	9
Men	6	11
<b>Breakdown by age group</b>		
< 30	2	1
30-50	2	11
> 50	2	8
<b>Breakdown by professional category</b>		
Senior management	0	3
Middle management	0	6
Specialized staff	2	8
Administrative / Auxiliary / Support	4	3
<b>Total</b>	<b>6</b>	<b>20</b>

## Average remuneration by gender, age and professional category

### Average remuneration by gender, age and professional category<sup>48</sup> (405-2)

(THOUSANDS OF EUROS)

	2023	2024
<b>Gender Breakdown</b>		
Men	70.82	71.15
Women	67.56	69.76
<b>Breakdown by Age Group</b>		
<30	40.29	45.77
30-50	63.06	64.25
>50	94.20	92.79
<b>Breakdown by professional category</b>		
Senior management	387.30	402.43
Middle management	160.70	160.03
Specialized staff	66.78	69.44
Administrative / Auxiliary / Support	43.27	47.24

<sup>48</sup> To calculate average remuneration at the Group, 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 and severity rate and occupational illnesses, days and hours missed and rate of absenteeism<sup>49</sup>

### Frequency and severity rate and occupational illnesses, days and hours missed and rate of absenteeism<sup>50</sup> (403-9)

2023									
Breakdown by region						Gender breakdown			
	Madrid	Barcelona	Bilbao	Valencia	Total	Men	Women	Total	
Accident rate with injury (Frequency rate) <sup>(2)</sup>	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	0.00	<b>0.01</b>	0.08	0.01	<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	hours	33,378	2,850	3,130	831	<b>40,190</b>	16,929	23,261	<b>40,190</b>
	rate	2.08	1.91	7.40	3.23	<b>2.20</b>	1.44	3.57	<b>2.20</b>

2024									
Breakdown by region						Gender breakdown			
	Madrid	Barcelona	Bilbao	Valencia	Total	Men	Women	Total	
Accident rate with injury (Frequency rate)	1.35	7.41	0.00	0.00	<b>1.80</b>	1.83	1.74	<b>1.80</b>	
Severity index	0.11	0.03	0.00	0.00	<b>0.10</b>	0.10	0.11	<b>0.10</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	11.14	2.96	0.00	0.00	<b>10.15</b>	9.91	10.60	<b>10.15</b>	
Absenteeism	hours	23,991	1,124	3,224	137	<b>28,496</b>	12,471	16,026	<b>29,496</b>
	rate	1.62	0.83	10.14	0.76	<b>1.71</b>	1.14	2.78	<b>1.71</b>

49 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 GRI Standards:

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 health and safety indices were as follows:

Accident rate with injury (Frequency rate): No. 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.

50 In 2024, there were 3 accidents at the BME Group: 2 men and 1 woman, two in Madrid and one in Barcelona.

## Hours of training by gender and professional category. Average hours of training by gender and professional category

### Employee training by professional category<sup>51 52</sup> (404-1).

	2023			2024		
	Men	Women	Total	Men	Women	Total
<b>Number of Hours of Employee Training (by Professional Category)</b>						
Senior management	0	80	<b>80</b>	33	17	<b>50</b>
Middle management	448	143	<b>591</b>	643	366	<b>1,099</b>
Specialized staff	7,520	7,520	<b>12,223</b>	12,340	6,922	<b>19,262</b>
Administrative / Auxiliary / Support	2,110	865	<b>2,975</b>	7,203	2,152	<b>9,355</b>
<b>Average Hours of Employee Training (by Professional Category)</b>						
h/employee - Senior management	0	27	<b>9</b>	5	6	<b>5</b>
h/employee - Middle management	11	6	<b>9</b>	15	13	<b>14</b>
h/employee - Specialist staff	20	21	<b>20</b>	27	28	<b>27</b>
h/employee - Administrative/auxiliary/support	11	11	<b>11</b>	28	22	<b>26</b>

51 These figures include training derived from training actions generally applicable to BME Group employees, including language training and personalized or specific training. Likewise, these figures do not include the SIX Spirit Blended Learning cultural awareness courses, the mandatory/regulatory courses, launched by Compliance, Security, PRL, Risk, etc., nor the courses offered through the "Udemy for Business" platform.

52 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, 2024 and December 31, 2024 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
	1	Fundamentals 2021		
<b>Business Model</b>				
Description of the business model	2-6	Activities, value chain and other business relationships	2 and 4.2	10 and 43
Business environment	2-1	Organizational details	2	10 and 19
Geographical presence and markets in which it operates	2-6	Activities, value chain and other business relationships	2 and 4	10 and 43
Organization and structure	2-6	Activities, value chain and other business relationships	Financial Statements 2 and 4	10 and 43
Objectives and strategies	2-22	Sustainable Development Strategy Declaration	Chairman's Letter. 2.1	4 22
Main factors and trends that may affect its future performance	2-22	Sustainable Development Strategy Declaration	Chairman's Letter. 2.1	22
<b>Group Policies and Their Results</b>				
Description of the policies applied by the Group and their results	2-23	Commitments and policies	2, 3, 4 and 5	10, 28, 36 and 55
	2-24	Incorporation of commitments and policies	2, 3, 4 and 5	10, 28, 36 and 55
<b>Short-, Medium- and Long-Term Risks</b>				
Short-, Medium- and Long-Term Risks	2-25	Processes to remedy negative impacts	Financial Statements 5.1	59
<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	2, 3, 4 and 5	10, 28, 36 and 55

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	1, 2 and 4	6, 10 and 28
	2-27	Compliance with laws and regulations	3.2	34
Precautionary principle	3-3	Management of material issues	3	28
Current and foreseeable effects of the Company's activities on the environment and, where appropriate, health and safety	3-3	Management of material issues	3	28
	201-2	Financial consequences and other risks and opportunities for the organization due to climate change	Financial Statements	
Amount of provisions and guarantees for environmental risks	3-3	Management of material issues	3	28
Environmental assessment or certification procedures	3-3	Management of material issues	3	28
<b>Pollution</b>				
Atmospheric pollution	3-3	Management of material issues	1, 2 and 4	6, 26 and 28
Light and noise pollution	Non-material indicator for the Group as can be seen from the double materiality analysis			
Measures to prevent, reduce or repair carbon emissions	305-5	Reduction of GHG emissions	3.1	29
<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 double materiality analysis			
<b>Sustainable Use of Resources</b>				
Water consumption	Non-material indicator for the Group as can be seen from the double materiality analysis. However, for the purposes of transparency, in 2024, the Group gathered, verified and reported this information.		3.2	34
Raw material consumption	Non-material indicator for the Group as can be seen from the double materiality analysis			
Direct and indirect energy consumption and measures taken to improve efficiency and use of renewable energy	3-3	Management of material issues	1, 2 and 4	6, 10 and 28
	302-1	Internal energy consumption	3.1	32 and 33
	302-2	External energy consumption	BME has not calculated the organization's external energy consumption.	
	302-3	Energy intensity	3.1	32 and 33
	302-4	Reduction of energy consumption	3.1	29 and 32

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 (GHG)	3-3	Management of material issues	1, 2 and 4	6, 10 and 28
	305-1	Direct GHG emissions (scope 1)	3.1	33
	305-2	Indirect GHG emissions when generating energy (scope 2).	3.1	33
	305-3	Other indirect GHG emissions (scope 3)	3.1	33
	305-5	Reduction of GHG emissions	3.1	32
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 3.1	29
	305-5	Reduction of GHG emissions	3.1	29 and 32
Reduction goals established voluntarily in the medium and long term to reduce greenhouse gas emissions	3-3	Management of material issues	1, 2 and 4	6, 10 and 28
Biodiversity protection	Non-material indicator for the Group as can be seen from the double 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	66
	2-8	Non-employee workers	3.2	33
			Annex I	68
	405-1	Diversity in governance bodies and employees	5 Annex I	56 66, 67 and 68
Total number and distribution of employment contract modalities	2-7	Employees	Annex I	68
Annual average contracts by contract type, broken down by gender, age and professional classification	2-7	Employees	Annex I	67
Employees with disabilities	405-1	Diversity in governance bodies and employees	Annex I	68
Number of dismissals by gender, age and professional classification	401-1	New employee hires and staff turnover	Annex I	71
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	
			5	58
	2-20	Processes to determine remuneration	5	58
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	4.1	37
			Annex I	71
Wage gap			4.1	41
Labor disconnection policies	3-3	Management of material issues	1, 2 and 4	6, 10 and 39

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	1, 2 and 4	6, 10 and 36
Organization of working time and measures aimed at facilitating the enjoyment of a work-life balance	3-3	Management of material issues	1, 2 and 4	6, 10 and 39
	401-2	Fringe benefits for full-time employees that are not offered to temporary or part-time employees	4	39
Number of hours of absenteeism	403-9	Work accident injuries	Annex I	72
<b>Health and security</b>				
Health and safety conditions at work	3-3	Management of material issues	1, 2 and 4.1	6, 10 and 41
	403-1	Occupational health and safety management system	4.1	41
	403-2	Hazard identification, risk assessment and accident investigation	4.1	41
	403-3	Occupational health services	4.1	41
	403-5	Training of workers on health and safety at work	4.1	41
	403-6	Promotion of occupational health	4.1	41
	403-7	Prevention and mitigation of impacts on the health and safety of workers directly linked through business relationships	4.1	41
Occupational accidents by gender and frequency and severity rates by gender	403-9	Work accident injuries	Annex I	72
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	
			4.1	41
<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.  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.	
	407-1	Operations and suppliers whose right to freedom of association and collective bargaining could be at risk		
Employees covered by collective bargaining agreements	2-30	Collective bargaining agreements	4.1	42

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 4.1 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		4.1	42
<b>Training</b>				
	3-3	Management of material issues	1, 2 and 4.1	6, 10 and 37
Policies implemented	404-2	Programs to improve employee skills and transition assistance programs	4.1	37
Total number of training hours by professional category	404-1	Average hours of training per year per employee	4.1 Annex I	37 73
<b>Universal accessibility for people with disabilities</b>				
Universal accessibility for people with disabilities	3-3	Management of material issues	1, 2 and 4.1	6, 10 and 40
<b>Equality</b>				
Measures adopted to promote equal treatment and opportunities between men and women	3-3	Management of material issues	1, 2 and 4.1	6, 10 and 40
Equality plans (Chapter III of Organic Law 3/2007, of March 22, to promote the effective equality of men and women), measures adopted to promote employment, protocols against sexual and gender-based harassment	3-3	Management of material issues	4.1	40
Universal integration and accessibility for people with disabilities	3-3	Management of material issues	4.1	40
Policy against all types of discrimination and in relation to diversity management	3-3	Management of material issues	4.1	40
<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 double materiality analysis		
Effective abolition of child labor		Non-material indicator for the Group as can be seen from the double materiality analysis		
	3-3	Management of material issues	1, 2 and 4	6, 10 and 40
Elimination of discrimination in employment and occupation	406-1	Cases of discrimination and corrective actions taken	4.1	40
Complaints arising from violations of human rights	406-1	Cases of discrimination and corrective actions taken	4.1	40



Law 11/2018, of December 28, on Non-Financial Information	GRI Content Index	Description	Headings of this Report / Other reports	Page/s
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	2	10
	2-26	Mechanisms for seeking advice and raising concerns	5.2	62
<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	5	57
	205-3	Confirmed cases of corruption and measures taken	5.2	62
Measures to combat money laundering	205-2	Communication and training on anti-corruption policies and procedures	5	57
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	
			4.3	52
<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	1, 2 and 4	6, 10 and 36
	203-1	Investments in infrastructures and supported services	4.3	48
	203-2	Significant indirect economic impacts	4.3	48
	413-1	Operations with local community participation, impact assessments and development programs	The percentage of operations is not reported as it is not available 4.3	52
Impact on local populations and the territory	413-1	Operations with local community participation, impact assessments and development programs	4.3	52
	413-2	Operations with significant actual and potential negative impacts on society	4.3	45
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. 2	29

<b>Law 11/2018, of December 28, on Non-Financial Information</b>	<b>GRI Content Index</b>	<b>Description</b>	<b>Headings of this Report / Other reports</b>	<b>Page/s</b>
Association or sponsorship actions	2-28	Association membership	2	21
			4.3	53
<b>Subcontracting and suppliers</b>				
Inclusion in the purchasing policy of social, gender equality and environmental issues	2-8	Management of material issues	4.2	43
			Annex I	68
Supervision and audits	3-3	Management of material issues	1, 2 and 4.2	6, 10 and 43
	3-3	Management of material issues	1, 2 and 4.2	6, 10 and 43
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	4.2	45
	204-1	Proportion of spending on local suppliers	4.2	44
<b>Consumers</b>				
Measures for the health and safety of consumers;	3-3	Management of material issues	1, 2 and 4.4	6, 10 and 54
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	5.2	63
	207-2	Fiscal governance, control and risk management	Financial statements	
	207-3	Participation of stakeholders and management of tax concerns	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.	
	207-4	Presentation of country-by-country reports	Financial statements	
	201-1	Direct economic value generated and distributed	Financial statements	2
Public subsidies received	201-4	Financial aid received from governments	5.2	65

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. 5.2	63
	415-1	Contributions to political parties/ representatives	5.2	65
	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	
			3	28
	2-27	Compliance with laws and regulations	4.1	36
			4.1	41
		5.2	62	
<b>Corporate governance</b>				
Corporate governance	2-9	Governance structure and composition	5	56
	2-13	Delegation of responsibility for managing impacts	5	56
			5.1	59
	2-11	Chairman of the highest governance body	5	56
	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.	
	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	2	19
	2-2	Entities included in the presentation of sustainability reports	Financial statements	
1			9	
			2.2	13
<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.	
			2	19
<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	1	4
	3-2	List of material topics	1	4
	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	2024	
			Annual	
			1	9
	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

