HUMAN RIGHTS POLICY

September 2026

ATLANTICO EUROPA

TABLE OF CONTENTS

1. Purpose 3
2. Scope 3
3. General Principles 3
3.1. Context 3
3.2. Commitment 3
3.3. Communication 4
3.4. Management Model 4
4. Final Provisions 5

1. Purpose

The Human Rights Policy of Banco ATLANTICO Europa, S.A., hereinafter also referred to as the Bank or ATLANTICO Europa, sets out the Bank's commitment to human and labour rights, the application of the principles relating to fundamental rights established in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, and, in particular, the United Nations Guiding Principles on Business and Human Rights of 2011.

The Bank is committed to respecting and promoting human rights within the scope of its activities and to preventing and/or mitigating any violations directly caused by its activities.

2. Scope

This Policy reflects best practice and applies to all the Bank's activities. It is a reference document that may be used as a guide or support for the drafting of other documents in this area, without prejudice to any adjustments that may need to be made, for example to comply with specific regulations, recommendations or requirements from supervisory authorities.

3. General Principles

3.1. Context

This Policy is aligned with the Code of Conduct and Ethics and the Employee Handbook, and with the principles established by the main international declarations in the field of human rights, namely:

- The International Bill of Human Rights, established by the Universal Declaration of Human Rights adopted by the United Nations General Assembly through the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;
- The United Nations Guiding Principles on Business and Human Rights;
- The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and its eight core conventions;
- The ten principles of the United Nations Global Compact.

3.2. Commitment

Under this Policy, ATLANTICO Europa undertakes the following commitments:

- To act in full compliance with the laws and regulations of the regions in which it operates, with integrity and good governance, promoting respect for human rights and decent labour practices within its sphere of influence, including amongst its employees, customers, partners, suppliers and other stakeholders;

- To respect the Universal Declaration of Human Rights, the Conventions of the International Labour Organisation, the United Nations Global Compact and the Guiding Principles on Business and Human Rights;
- To eliminate the use of child labour or forced labour in its operations and throughout its value chain;
- Respect the freedom to exercise the right to form trade unions and recognise the right to collective bargaining;
- To ensure that its labour policies and procedures are designed to prevent discrimination or differential treatment on the grounds of race, place of birth, nationality, religion, gender, age, disability, marital status, sexual orientation, political affiliation, opinion, trade union membership or any other status defined by law, in any of its activities or operations;
- To contribute to a work-life balance for employees, optimising and providing the best working conditions and practices, adapting them to the dynamics of different roles and the needs of employees;
- To prioritise the health and safety of employees, ensuring the development of appropriate occupational health and safety management systems;
- To promote awareness of human rights amongst employees;
- Maintain close ties with the communities in the regions where it operates, establishing dialogue, seeking to understand their needs and promoting social initiatives with a view to contributing to the improvement of community conditions;
- Respect the cultural integrity of local populations where it operates, recognising the rights of minorities and, where applicable, the rights of indigenous peoples;
- Respect the precautionary principle where its activities may result in serious and irreversible harm to human life or health or to the environment, taking appropriate measures to prevent or mitigate such effects.

3.3. Communication

The Human Rights Policy is communicated to all the Bank's staff.

3.4. Management Framework

The Board of Directors bears ultimate responsibility for the commitments undertaken through ATLANTICO Europa's Human Rights Policy.

4. Final Provisions

This Policy is approved by the Board of Directors and may be amended by resolution of that body.

It shall be reviewed whenever deemed appropriate or at least twice a year, and is disseminated internally and via the Bank's website.