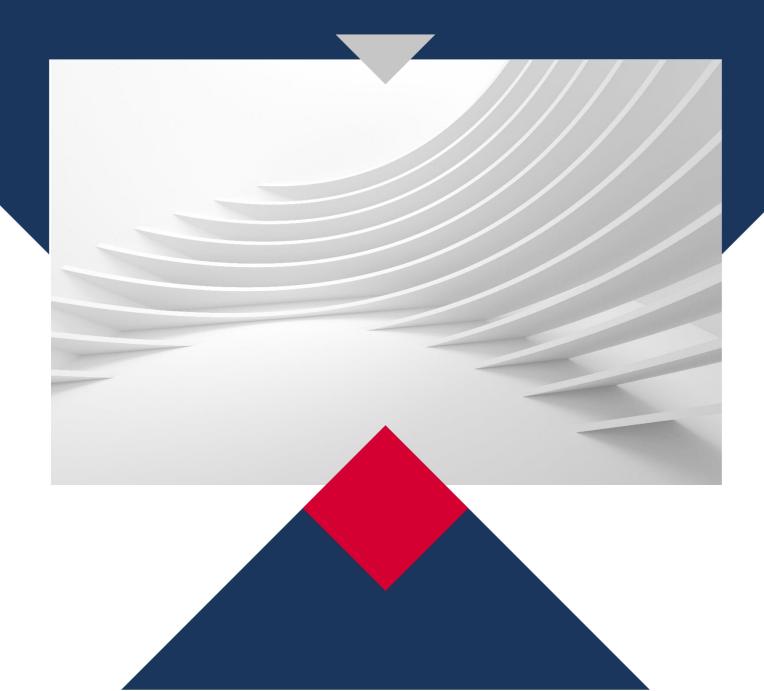


DIVERSITY AND INCLUSION POLICY

February 2021





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I. INTRODUCTION

A basic action principle established in the Code of Conduct of ALLFUNDS is to provide the same opportunities of access to work and professional promotion, ensuring the absence of discrimination based on gender, sexual orientation, race, religion, family roots, nationality, age, disability, language, marital status or social condition, political ideology, political or union affiliation, or any other characteristics that is not objectively related to working conditions.

Therefore, it is Allfunds' policy to ensure equality of treatment and opportunity for all its employees in recruitment, training, career opportunities, or any other aspect of the working relationship.

We live in a diverse and multicultural society and companies must reflect this reality in order to provide an adequate response to the specific needs of our clients. Ensuring diversity within the different teams helps the company face challenges from different angles, which translates into more innovative and creative solutions. In this sense, Allfunds understands diversity as a strategic value that facilitates constant evolution and innovation in the way we work and interact with our clients.

Therefore, Allfunds aims to ensure that any employee involved in internal and external recruitment, selection and professional promotion processes will be guided objectively in their actions and decisions, with an open attitude to diversity and with the purpose of identifying the people who are most suitable for the profile and needs of the position to be covered, promoting equal opportunities at all times.

II. SCOPE

Duration

This policy shall enter into force from its publication date and shall have an indefinite term. In any case, it should be regularly reviewed if deemed necessary.

Personnel affected

This policy aims to establish the guidelines and standards to apply with regard to Allfunds' corporate culture. Therefore, this policy applies to all employees and entities of the Group in all the countries where we have a presence, notwithstanding any modifications that may be needed to comply with local regulations and the recommendations or requirements established by their supervisory bodies.

III. PRINCIPLES OF THE DIVERSITY AND INCLUSION POLICY

This policy aims to ensure equality and diversity at Allfunds by eliminating any discrimination on grounds of gender, sexual orientation, race, religion, family origin, nationality, age, disability, language, marital status or social condition, political ideology, political or union affiliation or any other characteristic that is not objectively related to working conditions.

To do so, some general principles of conduct are established according to the following pillars:

1. RECRUITMENT AND ACCESS TO EMPLOYMENT

- Strengthening equal opportunities in the selection processes by promoting a diverse workforce in terms of gender, age, origin, sexual orientation, career, education, etc.
- Strengthening the mechanisms for access to employment for minority groups.
- Ensuring that people participating in the different phases of the recruitment processes have the necessary training and information to help them minimise unconscious biases or stereotypes.

2. TRAINING, PROMOTION AND DEVELOPMENT

- Encouraging equality of opportunities in the promotion and development processes by setting objective criteria to ensure the commitment to diversity and equality of opportunities.
- Driving and fostering access to training by establishing an objective system to identify training needs to ensure equal access to said training.
- Incorporating training and awareness actions on Diversity and Equality of Opportunities to Allfunds' Training Plan.

3. CULTURE, COMMUNICATION AND IMAGE

- Encouraging equality of opportunities at Allfunds.
- Incorporating a specific space in the corporate intranet with all the information related to diversity and equality.
- Strengthening, internally and externally, Allfunds Bank's commitment in the field of equality and diversity.
- Informing the companies and suppliers with whom we work of the commitments regarding equality and diversity so that they are aware and can work on them.
- Promoting information and training actions on Diversity and Equality of Opportunities.

4. REMUNERATION



- Ensuring equality of opportunities regarding remuneration by establishing a system to assess positions that guarantees the effective implementation of the principle of equal treatment and non-discrimination.
- Establishing a remuneration policy based on equality criteria that prohibits any type of discrimination on grounds of gender, age, origin, sexual orientation, career, education, etc.

5. WORK CONDITIONS

- Promoting effective measures to facilitate work and family conciliation for all Alffunds employees.
- Ensuring a safe work environment in which no type of harassment, intimidation or violence takes place.
- Ensuring accessibility to physical and digital environments to achieve the labour integration of employees with disabilities, thus allowing their work activity to be performed under the same conditions.

Madrid, 02 February 2021

