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1. INTRODUCTION

1.1. Scope and Purpose

This document aims to describe the policies of Bison Bank, S.A. (Bank) regarding the integration of sustainability risks and the consideration of negative impacts on sustainability in its processes.

The above-mentioned policies apply to the Bank insofar as it simultaneously carries out activities (i) as a financial market participant (*in casu*, credit institution that provides portfolio management services) and (ii) as a financial consultant (*in casu*, a credit institution that provides investment advisory services).

1.2. Policy Management

This Policy must be reviewed annually, to ensure that it is up to date and appropriate to the fulfilment of its purpose and that it is suitable to the Bank's internal and external environment.

When necessary, a mid-term review of the document may be carried out.

Any amendment to the policy must be made by the Wealth Management Department, with the necessary approval of the Board of Directors.

2. LEGAL FRAMEWORK

- Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 (Financial Regulation)
- Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 (Taxonomy Regulation)

3. SUSTAINABILITY RISKS

3.1. Concept

Sustainability risk is understood to be an event or condition of an environmental, social or governance nature whose occurrence may cause a significant negative impact on the value of the investment.

3.2. Risk Integration

The Bank, in the context of its activity, takes into account a set of Environmental, Social and Governance ("ESG") criteria, which are based on the 2030 Agenda for Sustainable Development adopted by the United Nations, in particular the 17 Development Goals Sustainable.

In addition, the Bank has established criteria for the identification, assessment, monitoring and management of environmental and social risks and other activities related to climate change in the Oil and Gas Sector, Energy Production Sector, Mining and Metals Sector, and *Soft Commodities*.

As a rule, and in line with the Taxonomy Regulation, the Bank will only consider as environmentally sustainable economic activities those activities that substantially contribute to one or more of the following objectives:

- climate change mitigation;

- adaptation to climate change;

- the sustainable use and protection of water and marine resources;

- the transition to a circular economy;

- the prevention and control of pollution; and

- the protection and restoration of biodiversity and ecosystems.

Thus, any decision-making will require a prior assessment of the most relevant impacts of environmental, social and climate change risk.

This assessment will be more detailed whenever related to the sectors listed above.

The Bank's sustainability risk management is developed based on the principle of proportionality, that is, it is appropriate to the size, nature, and complexity of the activity. In addition, the regulatory framework in terms of ESG is under development and there is an asymmetry in the information provided by issuing companies, whether in the European Union, where the issuance of legislation is in progress, or outside the European Union, where mandatory measures comparable to those in force at the European level are not in force.

3.3. Proportionality

The Bank weighs sustainability risks, considering the nature, scale and complexity of its activities. It should be noted, in particular, that the Bank does not comply with the requirements of larger institutions enshrined in article 4, no. 3 and 4 of the SFDR Regulation.

4. CONSIDERATION OF NEGATIVE IMPACTS

4.1. Impact on Investment Policy

In the provision of portfolio management services and investment advisory services, the Bank considers some of the main adverse effects on ESG factors, with implications for the implementation of the investment policy, throughout the investment cycle (investment or divestment decisions, and asset valuation). Investment strategies aim to obtain a return on investment that is consistent with the objectives of its clients, seeking to maximize social well-being.

The consideration of adverse effects takes into account the types of financial products on which the service focuses, observing the Bank's information provided by producers and/or distributors, the financial statements and, when necessary, through its own methodology.

At present, the Bank does not sell products that promote environmental or social characteristics provided for in article 8 of the SFDR, or that have the sustainable investment objectives referred to in article 9 of the SFDR.

Integrating sustainability risks into the investment cycle process makes it possible to complement traditional financial analysis, improving the assessment of investment risks. In this way, it is intended to improve the return-on-investment risk through the identification and management of potential sustainability risks that could change the value of the investments.

The following measures support the integration of sustainability risks into the investment cycle process:

- Use of specific ESG criteria in selecting Funds and analyzing financial assets (bonds and shares), establishing quantitative and qualitative limits to assess the sustainability risk of investments;

- Development of own analysis, management and decision-making tools, using ESG data from external suppliers;

- Promotion of specific training within the scope of ESG criteria and socially responsible investments.

The Bank avoids investing in any entity or company whose main commercial activity offers or involves the promotion, production, distribution or sale of products or services related to:

- Weapons and ammunition;

- Activities considered illegal under host country laws or regulations or international conventions and agreements, or subject to phasing out or international prohibition;

- Corruption, money laundering and terrorist financing;

- Radioactive materials (except for medicinal purposes);

- Forced labor and child labor;

- Pornography and prostitution;

- Violation of human rights.

The Bank also avoids investing in bonds or other sovereign debt securities issued by States that do not respect the exclusions and values present in this Policy, favoring investment in sovereign green debt securities.

4.2. Impact on Remuneration Policy

The Bank integrates existing sustainability risks into its Remuneration Policy, promoting sound and effective management, aligning the interests of Employees with the interests of the Bank.

The “Employee Remuneration Policy” and the “Remuneration Policy for Members of the Bank's Management and Supervisory Bodies” provide information on the Bank's fixed and variable remuneration structure, which complies with the appropriate qualitative and quantitative criteria. It is further informed that they comply with the legal terms in force, are subject to annual review and are published on the Bank's website.

5. PUBLICATION

The Policy on the Integration of Risks in Sustainability Matters will be published and is available for consultation on the Bank's website at www.bisonbank.com.