



Auditor's Report on Bankia, S.A. and Subsidiaries

(Together with the consolidated annual accounts and consolidated directors' report of Bankia, S.A. and subsidiaries for the year ended 31 December 2020)

(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)



KPMG Auditores, S.L.
Paseo de la Castellana, 259 C
28046 Madrid

Independent Auditor's Report on the Consolidated Annual Accounts

(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

To the Shareholders of Bankia, S.A.

REPORT ON THE CONSOLIDATED ANNUAL ACCOUNTS

Opinion

We have audited the consolidated annual accounts of Bankia, S.A. (the "Bank") and its subsidiaries that, together with the Bank, form the Bankia Group (hereinafter the "Group"), which comprise the consolidated balance sheet at 31 December 2020, and the consolidated income statement, consolidated statement of recognised income and expense, consolidated statement of changes in equity and consolidated statement of cash flows for the year then ended, and consolidated notes.

In our opinion, the accompanying consolidated annual accounts give a true and fair view, in all material respects, of the consolidated equity and consolidated financial position of the Group at 31 December 2020 and of its consolidated financial performance and consolidated cash flows for the year then ended in accordance with International Financial Reporting Standards as adopted by the European Union (IFRS-EU) and other provisions of the financial reporting framework applicable in Spain.

Basis for Opinion

We conducted our audit in accordance with prevailing legislation regulating the audit of accounts in Spain. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Consolidated Annual Accounts section of our report.

We are independent of the Group in accordance with the ethical requirements, including those regarding independence, that are relevant to our audit of the consolidated annual accounts pursuant to the legislation regulating the audit of accounts in Spain. We have not provided any non-audit services, nor have any situations or circumstances arisen which, under the aforementioned regulations, have affected the required independence such that this has been compromised.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key Audit Matters

Key audit matters are those matters that, in our professional judgement, were of most significance in the audit of the consolidated annual accounts of the current period. These matters were addressed in the context of our audit of the consolidated annual accounts as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Impairment of loans and advances to customers

See notes 3.1 and 12 to the consolidated annual accounts

Key audit matter	How the matter was addressed in our audit
<p>The Group's portfolio of loans and advances to customers, classified as financial assets at amortised cost, reflects a net balance of Euros 120,994,271 thousand at 31 December 2020, while allowances and provisions recognised at that date for impairment total Euros 3,323,004 thousand.</p> <p>For the purposes of estimating impairment, financial assets measured at amortised cost are classified into three categories (Stage 1, 2 or 3) according to whether a significant increase in their credit risk since initial recognition has been identified (Stage 2), whether the financial assets are credit-impaired (Stage 3) or whether neither of the foregoing circumstances apply (Stage 1). For the Group, establishing this classification is a relevant process inasmuch as the calculation of allowances and provisions for credit risk varies depending on the category in which the financial asset has been included.</p> <p>Impairment is calculated based on expected loss models, which the Group estimates on both an individual and a collective basis. This calculation entails a considerable level of judgement as this is a significant and complex estimate.</p> <p>Individual allowances and provisions consider estimates of future business performance and the market value of collateral provided for credit transactions.</p> <p>In the case of collective allowances and provisions, estimates of expected losses are calculated using internal models that use large databases, different macroeconomic scenarios, parameters to estimate provisions, segmentation criteria and automated processes, which are complex in their design and implementation and require past, present and future information to be considered. The Group regularly conducts recalibrations and tests of its internal models in order to improve their predictive capabilities based on actual historical experience.</p>	<p>Our audit approach in relation to the Group's estimate of impairment of loans and advances to customers due to credit risk, classified as financial assets at amortised cost, included an assessment of the relevant controls associated with the processes for estimating impairment, as well as different tests of detail on that estimate, for which we involved our credit risk specialists.</p> <p>Our procedures related to the control environment focused on the following key areas:</p> <ul style="list-style-type: none"> Identifying the credit risk management framework and assessing the compliance of the Group's accounting policies with the applicable regulations. Evaluating the classification of the loans and advances to customers portfolio based on their credit risk, in accordance with the criteria defined by the Group, particularly the criteria for identifying and classifying refinancing and restructuring transactions. Testing of the relevant controls relating to the information available for the monitoring of loans outstanding. Evaluating the design and implementation of the relevant controls over the management and measurement of collateral and guarantees. Assessing the consideration of the aspects observed by the Internal Valuation Unit as regards the recalibration and tests of the models to estimate collective allowances and provisions. Evaluating the control and management of the data used to estimate credit risk impairment. <p>Our tests of detail on the estimated expected losses essentially included the following:</p>

Impairment of loans and advances to customers

See notes 3.1 and 12 to the consolidated annual accounts

Key audit matter	How the matter was addressed in our audit
<p>The COVID-19 pandemic is affecting the economy and business activities, leading to a downturn in the macroeconomic situation. To mitigate the impacts of COVID-19, the Spanish government has launched initiatives to support the most affected sectors and customers through various measures such as the provision of State-backed credit facilities, the deferral of payments without penalties (moratoriums) and flexible financing and liquidity facilities. All these aspects have an impact on the parameters considered by the Group to quantify the expected losses on financial assets (macroeconomic variables, customer net revenues, value of collateral pledged, probability of default, etc.), thus increasing the uncertainty associated with their estimation. The Group has therefore recognised the adverse effects of COVID-19 on the impairment of financial assets in its consolidated income statement at 31 December 2020 by supplementing the expected losses estimated based on historical credit loss data, with certain additional adjustments deemed necessary to reflect the particular characteristics of borrowers, sectors or portfolios.</p> <p>The consideration of this aspect as a key audit matter is based both on the significance for the Group of the loans and advances to customers portfolio, and thus the significance of any allowances and provisions recognised, and on the relevance, subjectivity and complexity of the process for classifying these financial assets for the purpose of estimating impairment thereon and of the calculation of that impairment, while taking into consideration the additional situation generated by the COVID-19 pandemic.</p>	<ul style="list-style-type: none"> With regard to the impairment of individually significant transactions, we evaluated the suitability of the discounted cash flows models used by the Group and selected a sample from the population of significant risks with evidence of credit impairment and assessed the adequacy of the provisions recognised. This sample included borrowers from the economic sectors most impacted by COVID-19 and/or those that have received government aid due to the pandemic. With respect to the allowances and provisions for impairment estimated collectively, we evaluated the methodology used by the Group, assessing the integrity and accuracy of the input balances for the process and evaluating the correct functioning of the calculation engine by repeating the calculation process taking into account the segmentation and assumptions used by the Group. <p>In carrying out our audit procedures, we have taken into consideration the impacts of COVID-19 and the government aid on the calculation of expected losses. We also assessed and recalculated the estimate of the additional adjustments to the expected losses calculated using historical credit loss data.</p> <ul style="list-style-type: none"> We analysed whether the disclosures in the notes to the consolidated annual accounts are appropriate, in accordance with the criteria set out in the financial reporting framework applicable to the Group.

Impairment of foreclosed real estate assets

See note 18.3 to the consolidated annual accounts

Key audit matter	How the matter was addressed in our audit
<p>The Group's portfolio of foreclosed real estate assets, classified as non-current assets held for sale, reflects a net balance of Euros 1,349,325 thousand at 31 December 2020, while allowances and provisions recognised at that date for impairment total Euros 589,400 thousand.</p>	<p>Our audit approach in relation to the estimate of impairment of foreclosed real estate assets includes an assessment of the relevant controls associated with the processes for estimating impairment, as well as different tests of detail on this estimate, which basically included the following:</p>

Impairment of foreclosed real estate assets

See note 18.3 to the consolidated annual accounts

<i>Key audit matter</i>	<i>How the matter was addressed in our audit</i>
<p>Foreclosed real estate assets classified as held for sale are measured at the acquisition date and subsequently at the lower of the carrying amount of the financial assets relating to the foreclosure and the fair value less the estimated costs to sell the foreclosed real estate assets.</p> <p>For the purposes of determining the net fair value of these real estate assets, the Group uses its own internal methodology the starting point of which is the appraisal value, which is adjusted to take into account the experience of the sale of similar assets in terms of price and the period of time in which each asset is held on the balance sheet, among other factors.</p> <p>The process to estimate the impairment of these assets requires a considerable degree of judgement as it is a significant and complex estimate. We have therefore considered this a key audit matter.</p>	<ul style="list-style-type: none"> • Evaluating the competence, capacity and objectivity of the experts engaged by the Group for the valuation of the foreclosed real estate assets. • Analysing a sample of appraisals to determine the reasonableness of the procedures and the valuation methodology used by the experts engaged by the Group. To that end, we involved our specialists in real estate asset appraisals. • Evaluating the reasonableness of the key assumptions considered in the internal valuation methodology. • Analysing the reliability of the data sources used and the discounts applied in the internal valuation model. • Recalculating the impairment of foreclosed real estate assets. • We analysed whether the disclosures in the notes to the consolidated annual accounts are appropriate, in accordance with the criteria set out in the financial reporting framework applicable to the Group.

Recoverability of the deferred tax assets

See note 26.5 to the consolidated annual accounts

Key audit matter	How the matter was addressed in our audit
<p>At 31 December 2020, the Group held deferred tax assets amounting to Euros 10,420,626 thousand, of which the recovery of Euros 2,990,354 thousand is not guaranteed through the monetisation mechanisms established in Royal Decree-Law 14/2013 and article 130 of the Spanish Corporate Income Tax Law, as their recovery is dependent on obtaining future taxable profits.</p> <p>The recognition of deferred tax assets entails a high level of judgement in assessing the probability and sufficiency of future taxable profits, future reversals of existing taxable temporary differences and tax planning opportunities. The financial projections for future taxable profits have taken into consideration the economic impact of the COVID-19 pandemic on the business activity of the Group.</p> <p>Due to the significance of the balance of deferred tax assets and the uncertainty associated with the recovery thereof, and given the additional rise in this uncertainty due to the aforementioned situation derived from the COVID-19 pandemic, we have considered this a key audit matter.</p>	<p>Our audit procedures mainly include the following:</p> <ul style="list-style-type: none"> Assessing and evaluating the control environment of the process to recognise and analyse the recoverability of deferred tax assets. Evaluating, with the involvement of our valuation specialists, the methodology and key assumptions considered by the Group to estimate the recovery period for the deferred tax assets. We have analysed the main economic, financial and tax assumptions used by the Group to estimate future profits, taking into consideration those assumptions that have been adjusted due to the impacts of COVID-19. Contrasting the profit and loss forecasts used as a basis for recognising the deferred tax assets in prior years against the actual results obtained by the Group. Analysing the sensitivity of the results obtained by the Group. We analysed whether the disclosures in the notes to the consolidated annual accounts are appropriate, in accordance with the criteria set out in the financial reporting framework applicable to the Group.

Provisions for legal contingencies See notes 2.18 and 20 to the consolidated annual accounts	
<i>Key audit matter</i>	<i>How the matter was addressed in our audit</i>
<p>At 31 December 2020, the Group was party to a number of legal proceedings and claims arising in the ordinary course of its business activities.</p> <p>In general terms, determining the expected outcome of these proceedings and assessing their financial effect, and therefore the recognition of the related provision or, where necessary, the corresponding breakdown for contingent liabilities, are matters that entail significant complexity and uncertainty as regards their potential outcome and/or definitive amount, and therefore we have considered this a key audit matter.</p>	<p>Our audit procedures mainly include the following:</p> <ul style="list-style-type: none"> • Evaluating the control environment and the policies put in place by the Group to identify and classify the legal proceedings and claims, as well as to estimate the provision thereof. • Procuring and analysing the information prepared by the Group's legal advisors as regards proceedings underway in relation to the provisions recognised and significant contingencies disclosed. • Evaluating and analysing a sample of proceedings from the legal or regulatory documentation that support the provisions recognised and significant contingencies disclosed. To that end, we involved our specialists in legal matters. • Analysing the reasonableness of the methodology and of the main judgements and assumptions considered by the Group as regards the main provisions recognised and contingencies disclosed. To that end, we involved our specialists in legal matters. • Obtaining confirmation from external lawyers to contrast their assessment of the expected outcome of the claims and litigation against the provisions and contingencies identified by the Group. • We analysed whether the disclosures in the notes to the consolidated annual accounts are appropriate, in accordance with the criteria set out in the financial reporting framework applicable to the Group.

Risks associated with information technology	
Key audit matter	How the matter was addressed in our audit
<p>The Group's operations are based on a complex technological environment that is constantly evolving, and which must reliably and efficiently meet business requirements and ensure that the financial information is processed correctly.</p> <p>In this regard, correctly assessing whether the IT applications and systems used to prepare the financial information are being correctly maintained, as well as an evaluation of how these systems and applications are used and an assessment of the appropriateness of the physical and logical security of the information, are particularly relevant. We have therefore considered this a key audit matter.</p>	<p>With the help of our information systems specialists, we performed tests relating to internal control over the processes and systems involved in generating the financial information, in the following areas:</p> <ul style="list-style-type: none"> • An understanding of the information flows and identification of the key controls that ensure the processing of the information. • Tests of the key automatic processes that are involved in generating the financial information. • Testing of the controls over the applications and systems related to accessing and processing the information and those related to the security settings of these applications and systems. • Testing of the controls over the operation, maintenance and development of applications and systems.

Other Information: Consolidated Directors' Report

Other information solely comprises the 2020 consolidated directors' report, the preparation of which is the responsibility of the Bank's Directors and which does not form an integral part of the consolidated annual accounts.

Our audit opinion on the consolidated annual accounts does not encompass the consolidated directors' report. Our responsibility regarding the information contained in the consolidated directors' report is defined in the legislation regulating the audit of accounts, as follows:

- Determine, solely, whether the consolidated non-financial information statement and certain information included in the Annual Corporate Governance Report, as specified in the Spanish Audit Law, have been provided in the manner stipulated in the applicable legislation, and if not, to report on this matter.
- Assess and report on the consistency of the rest of the information included in the consolidated directors' report with the consolidated annual accounts, based on knowledge of the Group obtained during the audit of the aforementioned consolidated annual accounts. Also, assess and report on whether the content and presentation of this part of the consolidated directors' report are in accordance with applicable legislation. If, based on the work we have performed, we conclude that there are material misstatements, we are required to report them.



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Based on the work carried out, as described above, we have observed that the information mentioned in section a) above has been provided in the manner stipulated in the applicable legislation, that the rest of the information contained in the consolidated directors' report is consistent with that disclosed in the consolidated annual accounts for 2020, and that the content and presentation of the report are in accordance with applicable legislation.

Directors' and Audit and Compliance Committee's Responsibility for the Consolidated Annual Accounts

The Bank's Directors are responsible for the preparation of the accompanying consolidated annual accounts in such a way that they give a true and fair view of the consolidated equity, consolidated financial position and consolidated financial performance of the Group in accordance with IFRS-EU and other provisions of the financial reporting framework applicable to the Group in Spain, and for such internal control as they determine is necessary to enable the preparation of consolidated annual accounts that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated annual accounts, the Bank's Directors are responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Directors either intend to liquidate the Group or to cease operations, or have no realistic alternative but to do so.

The Bank's audit and compliance committee is responsible for overseeing the preparation and presentation of the consolidated annual accounts.

Auditor's Responsibilities for the Audit of the Consolidated Annual Accounts

Our objectives are to obtain reasonable assurance about whether the consolidated annual accounts as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion.

Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with prevailing legislation regulating the audit of accounts in Spain will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence economic decisions of users taken on the basis of these consolidated annual accounts.



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As part of an audit in accordance with prevailing legislation regulating the audit of accounts in Spain, we exercise professional judgement and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the consolidated annual accounts, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Bank's Directors.
- Conclude on the appropriateness of the Bank's Directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated annual accounts or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the consolidated annual accounts, including the disclosures, and whether the consolidated annual accounts represent the underlying transactions and events in a manner that achieves a true and fair view.
- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated annual accounts. We are responsible for the management, supervision and performance of the Group audit. We remain solely responsible for our audit opinion.

We communicate with the Bank's audit and compliance committee regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide the Bank's audit and compliance committee with a statement that we have complied with the applicable ethical requirements, including those regarding independence, and to communicate with them all matters that may reasonably be thought to bear on our independence and, where applicable, related safeguards.

From the matters communicated to the Bank's audit and compliance committee, we determine those that were of most significance in the audit of the consolidated annual accounts of the current period and which are therefore the key audit matters.

We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter.



REPORT ON OTHER LEGAL AND REGULATORY REQUIREMENTS

European Single Electronic Format

We have examined the digital files of Bankia, S.A. and its subsidiaries for 2020 in European Single Electronic Format (ESEF), which comprise the XHTML file that includes the consolidated annual accounts for the aforementioned year and the XBRL files tagged by the Bank, which will form part of the annual financial report.

The Directors of the Bank are responsible for the presentation of the 2020 annual financial report in accordance with the format and mark-up requirements stipulated in Commission Delegated Regulation (EU) 2019/815 of 17 December 2018 (hereinafter the "ESEF Regulation").

Our responsibility consists of examining the digital files prepared by the Directors of the Bank, in accordance with prevailing legislation regulating the audit of accounts in Spain. This legislation requires that we plan and perform our audit procedures to determine whether the content of the consolidated annual accounts included in the aforementioned digital files fully corresponds to the consolidated annual accounts we have audited, and whether the consolidated annual accounts and the aforementioned files have been formatted and marked up, in all material respects, in accordance with the requirements of the ESEF Regulation.

In our opinion, the digital files examined fully correspond to the audited consolidated annual accounts, and these are presented and marked up, in all material respects, in accordance with the requirements of the ESEF Regulation.

Additional Report to the Bank's audit and compliance committee

The opinion expressed in this report is consistent with our additional report to the Bank's audit and compliance committee dated 17 February 2021.

Contract Period

We were appointed as auditor by the shareholders at the ordinary general meeting on 27 March 2020 for a period of three years, beginning after the year commenced 1 January 2020.

KPMG Auditores, S.L.

On the Spanish Official Register of Auditors ("R.O.A.C.") with nº S0702

(Signed on original in Spanish)

Pedro González Millán

On the Spanish Official Register of Auditors ("R.O.A.C.") with nº20.175

17 February de 2021

2020 CONSOLIDATED FINANCIAL STATEMENTS

FOR THE YEAR ENDED 31 DECEMBER 2020

BANKIA GROUP

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)



Bankia

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BANKIA FINANCIAL STATEMENTS 2020 BANKIA GROUP

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

BANKIA, S.A. AND SUBSIDIARIES COMPOSING THE BANKIA GROUP			
Consolidated balance sheets at 31 December 2020 and 2019			
(in thousands of euros)			
ASSETS	NOTE	31/12/2020	31/12/2019 (*)
Cash, cash balances at central banks and other demand deposits	8	11,808,227	13,202,885
Financial assets held for trading	9	6,767,906	6,690,901
Derivatives		6,686,668	6,518,725
Equity instruments		684	1,381
Debt securities		80,554	170,795
Loans and advances		-	-
Central banks		-	-
Credit institutions		-	-
Customers		-	-
<i>Memorandum item: loaned or advanced as collateral with the right to sell or pledge</i>		5,316	67,682
Non-trading financial assets mandatorily at fair value through profit or loss	10	11,385	34,755
Equity instruments		-	-
Debt securities		193	237
Loans and advances		11,192	34,518
Central banks		-	-
Credit institutions		-	23,263
Customers		11,192	11,255
<i>Memorandum item: loaned or advanced as collateral with the right to sell or pledge</i>		-	-
Financial assets designated at fair value through profit or loss		-	-
Debt securities		-	-
Loans and advances		-	-
Central banks		-	-
Credit institutions		-	-
Customers		-	-
<i>Memorandum item: loaned or advanced as collateral with the right to sell or pledge</i>		-	-
Financial assets at fair value through other comprehensive income	11	8,623,635	11,981,872
Equity instruments		59,543	75,817
Debt securities		8,564,092	11,906,055
Loans and advances		-	-
Central banks		-	-
Credit institutions		-	-
Customers		-	-
<i>Memorandum item: loaned or advanced as collateral with the right to sell or pledge</i>		1,866,342	7,568,250
Financial assets at amortised cost	12	163,405,078	155,968,440
Debt securities		37,495,038	33,067,987
Loans and advances		125,910,040	122,900,453
Central banks		-	-
Credit institutions		4,915,769	5,467,442
Customers		120,994,271	117,433,011
<i>Memorandum item: loaned or advanced as collateral with the right to sell or pledge</i>		19,099,741	25,284,204
Derivatives - Hedge accounting	13	2,451,227	2,498,821
Fair value changes of the hedged items in portfolio hedge of interest rate risk		-	-
Investments in joint ventures and associates	14	468,538	454,902
Joint ventures		18,921	9,034
Associates		449,617	445,868
Assets under insurance or reinsurance contracts		-	-
Tangible assets	15	2,518,125	2,617,290
Property, plant and equipment		2,052,392	2,135,988
For own use		2,052,392	2,135,988
Leased out under an operating lease		-	-
Assigned to welfare projects (savings banks and credit cooperatives)		-	-
Investment property		465,733	481,302
Of which: leased out under an operating lease		465,733	481,302
<i>Memorandum item: acquired under a lease</i>		484,320	504,863
Intangible assets	16	505,234	401,406
Goodwill		86,062	88,462
Other intangible assets		419,172	312,944
Tax assets		10,685,280	10,863,999
Current tax assets		264,654	443,103
Deferred tax assets	26	10,420,626	10,420,896
Other assets	17	936,745	1,601,403
Insurance contracts linked to pensions		643,579	1,061,912
Inventories		-	-
Other		293,166	539,491
Non-current assets and disposal groups classified as held for sale	18	1,660,569	2,151,599
TOTAL ASSETS		209,841,949	208,468,273

The accompanying Notes 1 to 46 and Appendices I to XIII are an integral part of the consolidated balance sheet at 31 December 2020.

(*) The consolidated balance sheet at 31 December 2019 is presented solely and exclusively for comparison purposes. See Note 1.5.

BANKIA FINANCIAL STATEMENTS 2020 BANKIA GROUP

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

BANKIA, S.A. AND SUBSIDIARIES COMPOSING THE BANKIA GROUP			
Consolidated balance sheets at 31 December 2020 and 2019			
(in thousands of euros)			
LIABILITIES AND EQUITY	NOTE	31/12/2020	31/12/2019 (*)
Financial liabilities held for trading	9	6,876,191	6,750,111
Derivatives		6,686,987	6,478,878
Short positions		189,204	271,233
Deposits		-	-
Central banks		-	-
Credit institutions		-	-
Customers		-	-
Debt securities issued		-	-
Other financial liabilities		-	-
Financial liabilities designated at fair value through profit or loss		-	-
Deposits		-	-
Central banks		-	-
Credit institutions		-	-
Customers		-	-
Debt securities issued		-	-
Other financial liabilities		-	-
<i>Memorandum item: subordinated liabilities</i>		-	-
Financial liabilities at amortised cost	19	187,069,874	185,176,254
Deposits		166,193,408	165,053,977
Central banks		22,899,832	13,808,756
Credit institutions		14,834,045	26,460,485
Customers		128,459,531	124,784,736
Debt securities issued		18,436,794	18,679,709
Other financial liabilities		2,439,672	1,442,568
<i>Memorandum item: subordinated liabilities</i>		2,975,096	2,983,031
Derivatives - Hedge accounting	13	153,150	87,402
Fair value changes of the hedged items in portfolio hedge of interest rate risk		-	-
Liabilities under insurance or reinsurance contracts		-	-
Provisions	20	1,285,037	1,754,035
Pensions and other post-employment defined benefit obligations		644,494	1,038,243
Other long-term employee benefits		-	-
Pending procedural issues and tax litigation		195,903	224,539
Commitments and guarantees given		274,899	301,717
Other provisions		169,741	189,536
Tax liabilities		419,192	467,742
Current tax liabilities		1,566	129
Deferred tax liabilities	26	417,626	467,613
Share capital repayable on demand		-	-
Other liabilities	21	956,889	893,975
Of which: welfare fund (only savings banks and credit cooperatives)		-	-
Liabilities included in disposal groups classified as held for sale	18	1,383	3,657
TOTAL LIABILITIES		196,761,716	195,133,176
Own funds	22	12,932,347	13,141,770
Capital		3,069,522	3,069,522
Paid up capital		3,069,522	3,069,522
Unpaid capital which has been called up		-	-
Memorandum item: uncalled capital		-	-
Share premium		619,154	619,154
Equity instruments issued other than capital		-	-
Equity component of compound financial instruments		-	-
Other equity instruments issued		-	-
Other equity		-	-
Retained earnings		-	-
Revaluation reserves		-	-
Other reserves		9,063,343	8,962,001
Reserves or accumulated losses of investments in joint ventures and associates		(110,348)	(138,669)
Other		9,173,691	9,100,670
(-) Treasury shares		(49,475)	(50,343)
Profit or (-) loss attributable to owners of the parent		229,803	541,436
(-) Interim dividends		-	-
Accumulated other comprehensive income	23	145,339	180,002
Items that will not be reclassified to profit or loss		31,834	57,233
Actuarial gains or (-) losses on defined benefit pension plans		25,060	34,056
Non-current assets and disposal groups classified as held for sale		(18,744)	(9,347)
Share of other recognised income and expense of investments in joint ventures and associates		3,750	4,219
Fair value changes of equity instruments measured at fair value through other comprehensive income		21,768	28,305
Hedge ineffectiveness of fair value hedges for equity instruments measured at fair value through other comprehensive income		-	-
Fair value changes of equity instruments measured at fair value through other comprehensive income [hedged item]		-	-
Fair value changes of equity instruments measured at fair value through other comprehensive income [hedging instrument]		-	-
Fair value changes of financial liabilities at fair value through profit or loss attributable to changes in their credit risk		-	-
Items that may be reclassified to profit or loss		113,505	122,769
Hedge of net investments in foreign operations [effective portion]		-	-
Foreign currency translation		(458)	(113)
Hedging derivatives. Cash flow hedges [effective portion]		(3,063)	(8,006)
Fair value changes of debt instruments measured at fair value through other comprehensive income		85,764	82,085
Hedging instruments [not designated elements]		-	-
Non-current assets and disposal groups classified as held for sale		-	(2,674)
Share of other recognised income and expense of investments in joint ventures and associates		31,262	51,477
Minority interests [non-controlling interests]	24	2,547	13,325
Accumulated other comprehensive income		-	1,444
Other items		2,547	11,881
TOTAL EQUITY		13,080,233	13,335,097
TOTAL LIABILITIES AND EQUITY		209,841,949	208,468,273
MEMORANDUM ITEM: OFF-BALANCE SHEET EXPOSURES	27.2	43,227,511	36,704,675
Loan commitments given		28,656,212	23,256,169
Financial guarantees given		341,602	376,728
Contingent commitments given		14,229,697	13,071,778

The accompanying Notes 1 to 46 and Appendices I to XIII are an integral part of the consolidated balance sheet at 31 December 2020.

(*) The consolidated balance sheet at 31 December 2019 is presented solely and exclusively for comparison purposes. See Note 1.5.

BANKIA FINANCIAL STATEMENTS 2020 BANKIA GROUP

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

BANKIA, S.A. AND SUBSIDIARIES COMPOSING THE BANKIA GROUP
Consolidated income statements for the years ended 31 December 2020 and 2019

(in thousands of euros)

	NOTE	2020	2019 (*)
Interest income	29	2,288,968	2,459,289
Financial assets at fair value through other comprehensive income		81,214	143,340
Financial assets at amortised cost		2,006,770	2,180,847
Other interest income		200,984	135,102
(Interest expenses)	30	(384,850)	(436,262)
(Expenses on share capital repayable on demand)		-	-
A) NET INTEREST INCOME		1,904,118	2,023,027
Dividend income	31	1,854	17,434
Share of the profit or (-) loss of investments accounted for using the equity method	32	59,749	60,024
Fee and commission income	33	1,281,389	1,167,639
(Fee and commission expenses)	34	(68,583)	(86,996)
Gains or (-) losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss, net	35	154,400	288,744
Financial assets at amortised cost		127,968	71,247
Other financial assets and liabilities		26,432	217,497
Gains or (-) losses on financial assets and liabilities held for trading, net	35	15,832	19,870
Reclassification of financial assets out of measured at fair value through other comprehensive income		-	-
Reclassification of financial assets out of measured at amortised cost		-	-
Other gains or (-) losses		15,832	19,870
Gains or (-) losses on non-trading financial assets mandatorily at fair value through profit or loss, net		(516)	905
Reclassification of financial assets out of measured at fair value through other comprehensive income		-	-
Reclassification of financial assets out of measured at amortised cost		-	-
Other gains or (-) losses	35	(516)	905
Gains or (-) losses on financial assets and liabilities designated at fair value through profit or loss, net		-	-
Gains or (-) losses from hedge accounting, net	35	(22,787)	(11,531)
Exchange differences [gain or (-) loss], net		13,228	15,321
Other operating income	36	64,817	55,041
(Other operating expenses)	37	(315,078)	(304,448)
<i>Of which: mandatory contributions to welfare funds (only savings banks and credit cooperatives)</i>		-	-
Income from assets under insurance and reinsurance contracts		-	-
(Expenses on liabilities under insurance or reinsurance contracts)		-	-
B) GROSS INCOME		3,088,423	3,245,030
(Administrative expenses)		(1,585,198)	(1,615,728)
(Staff expenses)	38	(1,069,775)	(1,119,420)
(Other administrative expenses)	39	(515,423)	(496,308)
(Depreciation and amortisation)	40	(195,372)	(200,952)
(Provisions or (-) reversal of provisions)	41	24,431	(14,552)
(Impairment or (-) reversal of impairment on financial assets not measured at fair value through profit or loss and modification losses or (-) gains, net)	42	(1,043,792)	(462,941)
(Financial assets at fair value through other comprehensive income)		(198)	552
(Financial assets at amortised cost)		(1,043,594)	(463,493)
C) RESULTS FROM OPERATING ACTIVITIES		288,492	950,857
(Impairment or (-) reversal of impairment of investments in joint ventures and associates)	43	(97)	928
(Impairment or (-) reversal of impairment on non-financial assets)	43	(21,680)	(20,244)
(Tangible assets)		(15,786)	(14,544)
(Intangible assets)		(5,894)	(5,700)
(Other)		-	-
Gains or (-) losses on derecognition of non-financial assets, net	44	2,302	4,414
Negative goodwill recognised in profit or loss		-	-
Profit or (-) loss from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations	45	42,476	(180,265)
D) PROFIT OR (-) LOSS BEFORE TAX FROM CONTINUING OPERATIONS		311,493	755,690
(Tax expense or (-) income related to profit or loss from continuing operations)	26.3	(81,471)	(213,401)
E) PROFIT OR (-) LOSS AFTER TAX FROM CONTINUING OPERATIONS		230,022	542,289
Profit or (-) loss after tax from discontinued operations	18.5	-	-
F) PROFIT OR (-) LOSS FOR THE YEAR		230,022	542,289
Attributable to minority interests	24	219	853
Attributable to the parent		229,803	541,436
EARNINGS PER SHARE			
Basic earnings/(loss) per share	5	0.05	0.16
Diluted earnings/(loss) per share	5	0.05	0.16

The accompanying Notes 1 to 46 and Appendices I to XIII are an integral part of the consolidated income statement for 2020.

(*) The consolidated income statement for 2019 is presented solely and exclusively for comparison purposes. See Note 1.5.

BANKIA FINANCIAL STATEMENTS 2020 BANKIA GROUP

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

BANKIA, S.A. AND SUBSIDIARIES COMPOSING THE BANKIA GROUP**Consolidated statements of recognised income and expense for the years ended 31 December 2020 and 2019**

(in thousands of euros)	2020	2019 (*)
Profit or (-) loss for the year	230,022	542,289
Other comprehensive income	(36,107)	32,674
Items that will not be reclassified to profit or loss	(25,399)	2,606
Actuarial gains or (-) losses on defined benefit pension plans	(12,851)	5,881
Non-current assets and disposal groups held for sale	(13,424)	(13,353)
Share of other recognised income and expense of investments in joint ventures and associates	(469)	1,036
Fair value changes of equity instruments measured at fair value through other comprehensive income	(9,339)	9,714
Gains or (-) losses from hedge accounting of equity instruments at fair value through other comprehensive income, net	-	-
Fair value changes of equity instruments measured at fair value through other comprehensive income [hedged item]	-	-
Fair value changes of equity instruments measured at fair value through other comprehensive income [hedging instrument]	-	-
Fair value changes of financial liabilities at fair value through profit or loss attributable to changes in their credit risk	-	-
Income tax relating to items that will not be reclassified	10,684	(672)
Items that may be reclassified to profit or loss	(10,708)	30,068
Hedge of net investments in foreign operations [effective portion]	-	-
Valuation gains or (-) losses taken to equity	-	-
Transferred to profit or loss	-	-
Other reclassifications	-	-
Foreign currency translation	(493)	257
Translation gains or (-) losses taken to equity	(493)	257
Transferred to profit or loss	-	-
Other reclassifications	-	-
Cash flow hedges [effective portion]	7,061	(8,153)
Valuation gains or (-) losses taken to equity	7,061	(8,153)
Transferred to profit or loss	-	-
Transferred to initial carrying amount of hedged items	-	-
Other reclassifications	-	-
Hedging instruments [not designated elements]	-	-
Valuation gains or (-) losses taken to equity	-	-
Transferred to profit or loss	-	-
Other reclassifications	-	-
Debt instruments at fair value through other comprehensive income	5,256	28,037
Valuation gains or (-) losses taken to equity	25,710	241,175
Transferred to profit or loss	(20,454)	(213,138)
Other reclassifications	-	-
Non-current assets and disposal groups held for sale	1,230	(7,406)
Valuation gains or (-) losses taken to equity	1,230	(7,406)
Transferred to profit or loss	-	-
Other reclassifications	-	-
Share of other recognised income and expense of investments in joint ventures and associates	(20,215)	22,704
Income tax relating to items that may be reclassified to profit or (-) loss	(3,547)	(5,371)
Total comprehensive income for the year	193,915	574,963
Attributable to minority interests [Non-controlling interests]	(1,225)	979
Attributable to owners of the parent	195,140	573,984

The accompanying Notes 1 to 46 and Appendices I to XIII are an integral part of the consolidated statement of recognised income and expense for 2020.
 (*) The consolidated statement of recognised income and expense for 2019 is presented solely and exclusively for comparison purposes. See Note 1.5.

BANKIA FINANCIAL STATEMENTS 2020 BANKIA GROUP

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

BANKIA, S.A. AND SUBSIDIARIES COMPOSING THE BANKIA GROUP
Consolidated statement of changes in equity for the year ended 31 December 2020

(in thousands of euros)

Sources of equity changes	Capital	Share premium	Equity instruments issued other than capital	Other equity	Retained earnings	Revaluation reserves	Other reserves	(-) Treasury shares	Profit or (-) loss attributable to owners of the parent	(-) Interim dividends	Accumulated other comprehensive income	Minority interests		Total
												Accumulated other comprehensive income	Other items	
Opening balance at 31/12/2019 [before restatement]	3,069,522	619,154	-	-	-	-	8,962,001	(50,343)	541,436	-	180,002	1,444	11,881	13,335,097
Effects of corrections of errors	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Effects of changes in accounting policies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Opening balance [current period]	3,069,522	619,154	-	-	-	-	8,962,001	(50,343)	541,436	-	180,002	1,444	11,881	13,335,097
Total comprehensive income for the year					-	-	-		229,803		(34,663)	(1,444)	219	193,915
Other changes in equity	-	-	-	-	-	-	101,342	868	(541,436)	-	-	-	(9,553)	(448,779)
Issuance of ordinary shares	-	-			-	-	-						-	-
Issuance of preference shares	-	-	-		-	-	-						-	-
Issuance of other equity instruments			-		-	-	-						-	-
Exercise or expiration of other equity instruments issued			-		-	-	-						-	-
Conversion of debt to equity	-	-	-	-	-		-	-					-	-
Capital reduction	-	-			-	-	-	-	-				-	-
Dividends	-	-	-	-	-	-	(352,110)	-		-			-	(352,110)
Purchase of treasury shares					-	-	-	(30,086)				-	-	(30,086)
Sale or cancellation of treasury shares					-	-	(12,519)	30,954				-	-	18,435
Reclassification of financial instruments from equity to liability	-	-	-	-									-	-
Reclassification of financial instruments from liability to equity	-	-	-	-									-	-
Transfers among components of equity			-	-	-	-	541,436		(541,436)	-	-	-	-	-
Equity increase or (-) decrease resulting from business combinations	-	-	-	-	-	-	-	-					-	-
Share based payments	-	-											-	-
Other increase or (-) decrease in equity			-	-	-	-	(75,465)	-	-	-	-	-	(9,553)	(85,018)
Of which: discretionary contributions to welfare funds (only savings banks and credit cooperatives)					-		-							-
Closing balance at 31/12/2020 [current period]	3,069,522	619,154	-	-	-	-	9,063,343	(49,475)	229,803	-	145,339	-	2,547	13,080,233

The accompanying Notes 1 to 46 and Appendices I to XIII are an integral part of the consolidated statement of changes in equity for 2020.

BANKIA FINANCIAL STATEMENTS 2020 BANKIA GROUP

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

BANKIA, S.A. AND SUBSIDIARIES COMPOSING THE BANKIA GROUP
Consolidated statement of changes in equity for the year ended 31 December 2019 (*)

(in thousands of euros)

Sources of equity changes	Capital	Share premium	Equity instruments issued other than capital	Other equity	Retained earnings	Revaluation reserves	Other reserves	(-) Treasury shares	Profit or (-) loss attributable to owners of the parent	(-) Interim dividends	Accumulated other comprehensive income	Minority interests		Total
												Accumulated other comprehensive income	Other items	
Opening balance at 31/12/2018 [before restatement]	3,084,963	619,154	-	-	-	-	8,718,830	(96,646)	703,210	-	147,454	1,318	11,156	13,189,439
Effects of corrections of errors	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Effects of changes in accounting policies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Opening balance [current period]	3,084,963	619,154	-	-	-	-	8,718,830	(96,646)	703,210	-	147,454	1,318	11,156	13,189,439
Total comprehensive income for the year					-	-	-		541,436		32,548	126	853	574,963
Other changes in equity	(15,441)	-	-	-	-	-	243,171	46,303	(703,210)	-	-	-	(128)	(429,305)
Issuance of ordinary shares	-	-			-	-	-						-	-
Issuance of preference shares	-	-	-		-	-	-						-	-
Issuance of other equity instruments				-	-	-	-						-	-
Exercise or expiration of other equity instruments issued				-	-	-	-						-	-
Conversion of debt to equity	-	-	-	-	-		-	-					-	-
Capital reduction	(15,441)	-			-	-	(34,559)	50,000	-				-	-
Dividends	-	-	-	-	-	-	(353,515)	-		-			-	(353,515)
Purchase of treasury shares					-	-	-	(64,971)				-	-	(64,971)
Sale or cancellation of treasury shares					-	-	(12,143)	61,274				-	-	49,131
Reclassification of financial instruments from equity to liability	-	-	-	-									-	-
Reclassification of financial instruments from liability to equity	-	-	-	-									-	-
Transfers among components of equity			-	-	-	-	703,210		(703,210)	-	-	-	-	-
Equity increase or (-) decrease resulting from business combinations	-	-	-	-	-	-	-	-					-	-
Share based payments	-	-						-					-	-
Other increase or (-) decrease in equity			-	-	-	-	(59,822)	-	-	-	-	-	(128)	(59,950)
Of which: discretionary contributions to welfare funds (only savings banks and credit cooperatives)					-		-							-
Closing balance at 31/12/2019 [current period]	3,069,522	619,154	-	-	-	-	8,962,001	(50,343)	541,436	-	180,002	1,444	11,881	13,335,097

(*) The consolidated statement of changes in equity for 2019 is presented solely and exclusively for comparison purposes. See Note 1.5.

BANKIA FINANCIAL STATEMENTS 2020 BANKIA GROUP

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

BANKIA, S.A. AND SUBSIDIARIES COMPOSING THE BANKIA GROUP		
Consolidated statements of cash flows for the years ended 31 December 2020 and 2019		
(in thousands of euros)	2020	2019 (*)
A) CASH FLOWS FROM (USED IN) OPERATING ACTIVITIES	(843,521)	7,447,535
Profit or (-) loss for the year	230,022	542,289
Adjustments to obtain cash flows from (used in) operating activities	1,046,344	722,019
Depreciation and amortisation	195,372	200,952
Other adjustments	850,972	521,067
Net increase/decrease in operating assets	(3,994,008)	3,724,907
Financial assets held for trading	90,938	113,295
Non-trading financial assets mandatorily at fair value through profit or loss	22,854	(24,502)
Financial assets designated at fair value through profit or loss	-	-
Financial assets at fair value through other comprehensive income	3,374,410	3,905,283
Financial assets at amortised cost	(8,083,028)	408,583
Other operating assets	600,818	(677,752)
Net increase/decrease in operating liabilities	1,821,747	2,315,570
Financial liabilities held for trading	(41,863)	207,286
Financial liabilities designated at fair value through profit or loss	-	-
Financial liabilities at amortised cost	2,170,866	2,493,225
Other operating liabilities	(307,256)	(384,941)
Income tax received/paid	52,374	142,750
B) CASH FLOWS FROM INVESTING ACTIVITIES	235,144	1,195,425
Payments	(224,689)	(227,931)
Tangible assets	(40,687)	(63,794)
Intangible assets	(154,866)	(163,373)
Investments in joint ventures and associates	(16,263)	(17)
Subsidiaries and other business units	(2)	(3)
Non-current assets and liabilities classified as held for sale	(12,871)	(744)
Other payments related to investing activities	-	-
Receipts	459,833	1,423,356
Tangible assets	38,123	40,445
Intangible assets	-	-
Investments in joint ventures and associates	34,368	54,594
Subsidiaries and other business units	-	1,153
Non-current assets and liabilities classified as held for sale	387,342	1,327,164
Other receipts related to investing activities	-	-
C) CASH FLOWS USED IN FINANCING ACTIVITIES	(786,281)	(193,875)
Payments	(804,716)	(4,378,006)
Dividends	(352,110)	(353,515)
Subordinated liabilities	-	(1,006,860)
Redemption of own equity instruments	-	-
Acquisition of own equity instruments	(30,086)	(64,971)
Other payments related to financing activities	(422,520)	(2,952,660)
Receipts	18,435	4,184,131
Subordinated liabilities	-	1,000,000
Issuance of own equity instruments	-	-
Disposal of own equity instruments	18,435	49,131
Other receipts related to financing activities	-	3,135,000
D) EFFECT OF EXCHANGE RATE FLUCTUATIONS	-	-
E) NET INCREASE/(DECREASE) IN CASH AND CASH EQUIVALENTS (A+B+C+D)	(1,394,658)	8,449,085
F) CASH AND CASH EQUIVALENTS AT THE BEGINNING OF THE PERIOD	13,202,885	4,753,800
G) CASH AND CASH EQUIVALENTS AT THE END OF THE PERIOD	11,808,227	13,202,885
MEMORANDUM ITEM		
COMPONENTS OF CASH AND CASH EQUIVALENTS AT THE END OF THE PERIOD		
Cash	936,301	951,826
Cash equivalents at central banks	10,380,666	11,672,642
Other financial assets	491,260	578,417
Less: bank overdrafts repayable on demand	-	-
Total cash and cash equivalents at the end of the period	11,808,227	13,202,885
Of which: held by Group entities but not available to the Group	-	-

The accompanying Notes 1 to 46 and Appendices I to XIII are an integral part of the consolidated income statement for 2020.

(*) The consolidated statement of cash flows for 2019 is presented solely and exclusively for comparison purposes. See Note 1.5.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

BANKIA, S.A. AND SUBSIDIARIES COMPOSING THE BANKIA GROUP

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2020

(1) Description of the Group, incorporation of Bankia, reporting framework applied to draw up the consolidated financial statements and other information.

(1.1) Group description

Bankia, S.A. ("the Bank" or "Bankia" or the "Entity") is a private-law entity subject to the legislation and regulations for banks operating in Spain. Its registered office is at calle Pintor Sorolla, 8, Valencia. At 31 December 2020, the Bank's branch network comprised 2,127 offices. Bankia's bylaws may be consulted, together with other relevant legal information, at its registered office and on its website (www.bankia.com).

Bankia's bylaws stipulate the activities it may engage in, which are those commonly carried out by credit institutions and, in particular, meet the requirements of Law 10/2014, of 26 June, on the organisation, supervision and solvency of credit institutions.

Bankia is the parent of a business group (the "Group" or "Bankia Group"). At 31 December 2020, the consolidated group encompassed 41 companies, including subsidiaries, associates and joint ventures. These companies engage in a range of activities, including insurance, asset management, financing, services and property management. Appendices II, III and IV list the entities that form part of the scope of consolidation of the Bankia Group at 31 December 2020 (subsidiaries controlled by the Bank, joint ventures and associates over which Bankia, directly or indirectly, exercises significant influence, distinguishing those classified under "Non-current assets held for sale"), and specifying the percentage of voting rights controlled by Bankia in each company.

Bankia's main shareholder is BFA, Tenedora de Acciones, S.A.U. (hereinafter "BFA"), which at the 2020 year end held shares representing 61.83% of its share capital (62.48% including the impact of treasury shares). Therefore, in addition to the transactions it carries out directly, Bankia is a subsidiary of and belongs to the BFA, Tenedora de Acciones Group (hereinafter "BFA Group").

The Bankia Group's consolidated financial statements for 2020 were authorised for issue by Bankia's directors at the Board meeting held on 16 February 2021. The financial statements are pending approval by the shareholders of Bankia at their general meeting. However, the Bank's Board of Directors considers that these financial statements will be approved without any significant changes. The Bankia Group's consolidated financial statements for 2019 were approved by the shareholders at the general meeting held on 27 March 2020.

Appendix I presents the Bank's balance sheet at 31 December 2020, the income statement, statement of recognised income and expense, the statement of total changes in equity and the statement of cash flows for the year then ended, together with information related to 2019 for comparative purposes.

(1.2) Group incorporation

The Group was formed in July 2010 from the integration of seven savings banks (Caja Madrid, Bancaja, Caja Canarias, Caja Ávila, Caixa Laietana, Caja Segovia and Caja Rioja) under the Institutional Protection Scheme (IPS), whereby the resulting new Group integrated their organisation and management, acting as a single entity for accounting and regulatory purposes. BFA was incorporated in December 2010. Bankia, the institution resulting from the merger of the aforementioned seven savings banks, was subsequently incorporated as a subsidiary of BFA.

In 2012, several capital management measures were carried out and public aid was received, after which the Fund for Orderly Bank Restructuring (FROB) became BFA's sole shareholder. On 28 November 2012, the BFA-Bankia Group's Restructuring Plan for the 2012-2017 period was approved by the European Commission, the Bank of Spain and the FROB. At 31 December 2017, the Group had completed the measures and commitments set out in the Restructuring Plan.

In December 2017, Bankia carried out the merger by absorption of Banco Mare Nostrum, S.A. ("BMN"), which was the result of the 2010 merger of four savings banks – Cajamurcia, Caja Granada, Sa Nostra and Caixa Penedès. Its sole shareholder was the FROB following the capital management measures carried out and the public aid received in 2012 and 2013 under the framework of its Restructuring Plan approved by the European Commission, the Bank of Spain and the FROB in December 2012.

Royal Decree-Law 4/2016, of 2 December, introducing urgent measures on financial matters, extended the period for the FROB to dispose of its stake in Bankia from five to seven years. It also provided for the possibility of further extensions subject to approval by the Council of Ministers. On 21 December 2018, the Council of Ministers approved a further two-year extension of the divestment period for Bankia's privatisation to December 2021, with the aim of making more efficient use of public funds, maximising the recovery of the public aid given and allowing the FROB to carry out a more flexible divestment strategy so as to find the right conditions in the capital markets.

On 25 January 2019, the FROB, BFA and Bankia publicly announced an agreement regarding the management of the FROB's indirect holding, through BFA, Tenedora de Acciones S.A.U. in Bankia, S.A. Under prevailing legislation, this management is designed to favour the recovery of the public aid, ensuring maximum efficiency in the use of public funds and safeguarding the stability of the financial system.

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After completion of all the restructuring plans of the entities that received public financial support from the FROB and the divestment of all public holdings, except in the BFA-Bankia Group, the FROB's policy was updated (article 54.7 of Law 11/2015). The update lends continuity to the way the stake in the BFA-Bankia Group was being managed; i.e. based on responsible and informed monitoring of the investment; non-intervention in the management of the credit institution, allowing its directors to operate with independence; and promoting best practices in the securities market.

(1.3) Reporting framework applied to draw up the consolidated financial statements

In accordance with Regulation (EC) No 1606/2002 of the European Parliament and of the Council of 19 July 2002, all companies governed by the laws of a member state of the European Union and whose securities are traded on a regulated market in any European Union country must file consolidated financial statements for periods beginning on or after 1 January 2005 in accordance with the International Financial Reporting Standards as adopted by the European Union ("IFRS-EU").

In this respect, the Bankia Group's consolidated financial statements for 2020 were presented in accordance with IFRS-EU, considering Bank of Spain Circular 4/2017 of 27 November 2017, on public and confidential financial reporting rules and formats for credit institutions ("Circular 4/2017") and subsequent amendments, which implemented and adapted IFRS-EU for Spanish credit institutions.

The Group's consolidated financial statements for 2020 were prepared taking into account all accounting principles and standards and mandatory measurement criteria applicable in order to give a true and fair view, in all material respects, of the consolidated equity and financial position of Bankia, S.A. and subsidiaries composing the Bankia Group at 31 December 2020 and of the consolidated results of their operations and consolidated cash flows during the financial year then ended, pursuant to the aforementioned financial reporting framework, and in particular to the accounting principles and criteria therein.

The consolidated financial statements of the Bankia Group were prepared from the accounting records of Bankia and the other Group entities. However, since the accounting policies and measurement bases used in preparing these consolidated financial statements may differ from those used by certain Group entities, the required adjustments and reclassifications were made on consolidation to unify such policies and criteria and to make them compliant with the IFRS-EU used by the Bank.

The main accounting policies and measurement bases applied in preparing the Group's consolidated financial statements for 2020 are summarised in Note 2.

In addition, the requirements laid down in "Commission Delegated Regulation (EU) 2018/815 of 17 December 2018 supplementing Directive 2004/109/EC of the European Parliament and of the Council with regard to regulatory technical standards on the specification of a single electronic reporting format" have been taken into consideration.

(1.3.1) Main regulatory changes during the period from 1 January to 31 December 2020

A) New standards, amendments and interpretations with mandatory application in the calendar year that began on 1 January 2020, approved by the European Union

Following is a list of the main mandatory standards, amendments or interpretations endorsed by the European Union with mandatory application in the annual period that began on 1 January 2020, and which have therefore been applied in the preparation of these consolidated financial statements:

- Amendments to the IFRS Conceptual Framework

[Effective for annual periods beginning on or after 1 January 2020]

The conceptual framework review includes revised asset and liability definitions, as well as a new guide to their measurement, derecognition, presentation and disclosure.

The amendment described above has had no relevant impact on these consolidated financial statements or their disclosures.

- Amendments to IAS 1 "Presentation of Financial Statements" and IAS 8 "Accounting Policies, Changes in Accounting Estimates and Errors"

[Effective for annual periods beginning on or after 1 January 2020]

Introduces amendments to the aforementioned standards to align the materiality definition with that contained in the conceptual framework.

The standards described above have had no relevant impact on these consolidated financial statements or their disclosures.

- Amendments to IFRS 9, IAS 39 and IFRS 7: Interest rate benchmark reform - Phase 1

[Effective for annual periods beginning on or after 1 January 2020]

Several regulators in various jurisdictions are currently in the process of reforming the indices used as interest rate benchmarks for multiple financial transactions with different terms and currencies between different financial market participants.

These benchmark indices are being replaced by other risk-free alternatives based on real transactions.

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The interest rate benchmark reform could mean that certain requirements for hedging relationships cease to be met. This could lead to the discontinuation of hedging relationships designated by entities at the benchmark date.

For this reason, the IASB initiated a project to amend accounting standards, aimed at avoiding the discontinuation of affected hedging, and which comprises two phases:

- Phase 1 (finalised and adopted by the European Union): amendments required during the period prior to the full replacement of the benchmark indices.
- Phase 2 (finalised and to be adopted by the European Union): amendments required once the prevailing rates have been either definitively modified or replaced.

The phase 1 amendments include certain temporary exceptions to the general application of the standards (IAS 39 and IFRS 9), as well as requirements for additional disclosures (IFRS 7) in the event of using these temporary exceptions. These amendments cover the hedging relationships directly affected by the interest rate benchmark reform currently underway. It is understood that hedging relationships are directly affected by the reform if the reform gives rise to uncertainties about the timing or the amount of interest rate benchmark-based cash flows of the hedged item or of the hedging instrument.

The temporary exceptions shall cease to be applicable once certain conditions are met. One of these conditions is that the uncertainty deriving from the interest rate benchmark reform disappears with respect to the timing and the amount of the interest rate benchmark-based cash flows or when the hedging relationship is discontinued.

In order to implement the changes arising directly from the interest rate benchmark reform, the Group has created a multidisciplinary working group comprised of members of the Risks, Systems, Legal, Business, Regulatory Compliance and other Directorates, geared towards managing the transition of the affected contracts. The project is led by Financial Management, which regularly reports to the Group's governing bodies on the status of the implementation.

The completion of phase 1 has not had a relevant impact on these consolidated financial statements or on its disclosures, as there is no uncertainty with regard to the future of the EURIBOR, the interest rate benchmark used for most of the interest rate hedging designated by the Group. The EURIBOR will continue to be used and will not be replaced, however its calculation methodology will be reformed. The amendments introduced to its calculation methodology meet the requirements of the European Regulation on indices used as benchmarks (Benchmarks Regulation or BMR). This has meant that financial instruments referenced to the aforementioned index are not directly affected by the reform and therefore, it has not been necessary to use the aforementioned temporary exceptions.

- **Amendments to IFRS 3: "Business Combinations"**

[Effective for annual periods beginning on or after 1 January 2020]

Introduces clarifications to the definition of business. Specifically, it stipulates that, to be considered a business, an integrated set of activities and assets must include, at a minimum, an input and a substantive process that together significantly contribute to the ability to create output. It also clarifies that a business can exist even without including all of the inputs and processes required to create output.

The standard described above has had no relevant impact on these consolidated financial statements or their disclosures.

- **Amendments to IFRS 16: "Leases"**

[Effective on or after 1 June 2020]

This introduces a practical expedient to which lessees can opt, whereby they are exempt from assessing whether a COVID-19-related rent concession, that meets certain conditions, is a lease modification.

The standard described above has had no relevant impact on these consolidated financial statements or their disclosures.

B) New standards, amendments and interpretations with mandatory application in years subsequent to the calendar year that began on 1 January 2020 approved by European Union

The main standards, amendments and interpretations issued by the IASB and approved by the European Union for mandatory application in periods after the natural year that began on 1 January 2020, are as follows:

- **Amendments to IFRS 4: "Insurance Contracts"**

[Effective for annual periods beginning on or after 1 January 2021]

Extension of the temporary exemption to insurance entities from applying IFRS 9 "Financial Instruments" and certain provisions of IAS 28 "Investments in Associates and Joint Ventures" to annual periods beginning on or after 1 January 2023.

C) New standards, amendments and interpretations with mandatory application in years subsequent to the calendar year that began on January 2020 pending approval by the European Union

The following are the main standards, amendments or interpretations issued by the IASB that were pending approval by the European Union and are therefore not applied in the preparation of these consolidated financial statements:

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- **IFRS 17: "Insurance Contracts"**

[Effective for annual periods beginning on or after 1 January 2023, with early application permitted]

IFRS 17 sets out the principles for recognition, measurement, presentation and disclosure of insurance contracts. Its purpose is to ensure that an entity provides relevant information that faithfully represents such contracts. This information provides a basis for assessing the effect that insurance contracts have on the financial position of the entity, financial performance and cash flows. IFRS 17 replaces IFRS 4 on insurance contracts.

- **Amendments to IAS 1: "Presentation of Financial Statements"**

[Effective for annual periods beginning on or after 1 January 2023, with early application permitted]

This introduces clarifications on the requirements that have to be applied when classifying liabilities as current or non-current.

- **Amendments to IFRS 3: "Business Combinations"**

[Effective for annual periods beginning on or after 1 January 2022, with early application permitted]

Amendments shall be made to the references to the Conceptual Framework for Financial Information contained in the standard.

- **Amendments to IAS 16: "Property, Plant and Equipment"**

[Effective for annual periods beginning on or after 1 January 2022, with early application permitted]

Prohibition of an entity from being able to deduct from the cost of an item of property, plant and equipment any proceeds from selling items produced before the asset is available for use.

- **Amendments to IFRS 37 "Provisions, Contingent Liabilities and Contingent Assets"**

[Effective for annual periods beginning on or after 1 January 2022, with early application permitted]

Specifies the components that an entity must include as the cost of fulfilling a contract when assessing whether a contract is onerous.

- **Annual "Improvements to IFRS" project (2018-2020 cycle)**

[Effective for annual periods beginning on or after 1 January 2022, with early application permitted]

The improvements included in this cycle affect the following standards:

- IFRS 1 "First-time Adoption of International Financial Reporting Standards". Those subsidiaries that have adopted IFRS on a date subsequent to their parent are permitted to measure cumulative translation differences using the amounts reported by their parent, avoiding the need to keep two parallel accounting records.
- IFRS 9 "Financial instruments". The amendment clarifies which costs or fees an entity must include when it applies the '10 per cent' test when derecognising a financial liability. Only costs or fees paid or received between the borrower and the lender must be included as such.
- IFRS 16 "Leases" Amendment to Illustrative Example 13 accompanying the standard, in order to avoid any potential confusion regarding the treatment of lease incentives.
- IAS 41 "Agriculture". Removal of the requirement to exclude taxation cash flows when measuring the fair value in accordance with IAS 41.

- **Amendments to IFRS 9, IAS 39, IFRS4 and IFRS 16: Interest rate benchmark reform - Phase 2**

[Effective for annual periods beginning on or after 1 January 2021]

After the publication of the phase 1 amendments described above, phase 2 covers matters that could affect the presentation of financial information during the interest rate benchmark reform, such as changes in the basis used to determine contractual cash flows or hedging relationships that arise as a result of the interest rate benchmark reform.

The Group intends to adopt the aforementioned standards and amendments when they come into force and if they are finally applicable. Likewise, it continues to evaluate their impact. From the preliminary analyses performed, their initial application is not expected to have a significant impact on the consolidated financial statements.

(1.4) Responsibility for the information and estimates made

The information in these consolidated financial statements is the responsibility of Bankia's directors.

In the Group's consolidated financial statements for the year ended 31 December 2020, estimates were made in order to quantify certain assets, liabilities, income, expenses and obligations reported therein. These estimates relate basically to the following:

- The fair value of certain financial and non-financial assets and liabilities (see Notes 2.2 and 2.20).

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- Impairment and the classification by levels of certain financial assets, considering the value of the collateral received, and non-financial assets (mainly property), as well as contingent liabilities (see Notes 2.9, 2.15, 2.16, 2.17 and 2.20).
- Classification of financial assets, in the context of the assessment to determine whether the contractual cash flows are solely payments of principal and interest on the principal amount outstanding (see Note 2.2.4).
- The assumptions used in the actuarial calculation of the post-employment benefit liabilities and obligations and other long-term obligations (see Note 2.13).
- The estimation of the recoverable amount and costs to sell of non-current assets held for sale, investment property and inventories, based on their nature, condition and the purpose for which they are intended, acquired by the Group in payment of debt, regardless of the legal format pursuant to which they were acquired (see Notes 2.15, 2.17 and 2.20).
- The recoverability of recognised deferred tax assets (see Notes 2.14 and 26).
- The estimation of the commitments included in the agreement for the sale of the CIU custodian business (see Note 27).
- The useful life, right-of-use value and recoverable amount of tangible and intangible assets (see Notes 2.15 and 2.16).
- The assumptions used to quantify certain provisions and the probability of occurrence of certain losses to which the Group is exposed due to its activity (see Notes 2.18 and 20).

The declaration of COVID-19 as a global pandemic, and its health, economic and social consequences, has increased uncertainty regarding reasonable and supported macroeconomic information, and the impact of public aid measures required to estimate the Group's loan losses. The current scenario is subject to ongoing changes which, together with the lack of comparable historical references, give rise to a high level of volatility in these figures in the short term. The quantification of the adjustments arising from the situation caused by COVID-19 has entailed a high level of expert judgement by the Group (see Note 1.16).

Although these estimates were made on the basis of the best information available at 31 December 2020 and at the date of authorisation for issue of these consolidated financial statements on the events analysed, future events may require these estimates to be increased or decreased in subsequent years. Any changes to accounting estimates would be applied prospectively in accordance with the applicable standards, recognising the effects of the change in estimates in the related consolidated income statement in the future.

(1.5) Comparative information

As required by current law, the information contained in these consolidated financial statements relating 2019 is presented exclusively for the purposes of comparison with the information for 2020 and therefore does not constitute the Group's consolidated financial statements for 2019.

(1.6) Agency agreements

A list at 31 December 2020 of the Group's agents which meet the conditions established in Article 21 of Royal Decree 84/2015, of 13 February, is provided in Appendix XI, attached hereto.

(1.7) Investments in the capital of credit institutions

Details of ownership interests of more than 5% held by non-Group Spanish or foreign credit institutions in the share capital or voting rights of credit institutions forming part of the Group at 31 December 2019 was as follows:

Shareholding institution	Investee	Percentage ownership
Banco Popular de Ahorro de Cuba	Corporación Financiera Habana, S.A., in liquidation (see Note 1.15)	40.00%

In 2020, Corporación Financiera Habana, S.A., in liquidation, was wound up. As such, no equity investment is held in this company at 31 December 2020.

The Group has no ownership interests of 5% or more in the capital or voting rights of other Spanish or foreign credit institutions at 31 December 2020.

(1.8) Environmental impact

In view of the business activities carried out by the Group (see note 1.1), it does not have any environmental liabilities, expenses, assets, provisions or contingencies that might be significant with respect to its equity, financial position and results. Therefore, no specific disclosures relating to environmental issues are included in these notes to the financial statements.

(1.9) Minimum reserve ratio

At 31 December 2020 and throughout 2020, the Group met the minimum reserve ratio required by applicable Spanish legislation.

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(1.10) Deposit Guarantee Fund and Single Resolution Fund

The Bank is a member of the Credit Institution Deposit Guarantee Fund (hereafter “DGF”) created by Royal Decree-Law 16/2011, of 14 October, whose purpose is to guarantee deposits in cash, securities or other financial instruments at credit institutions, up to a maximum of EUR 100,000 for cash deposits or, for deposits made in another currency, the equivalent amount applying the appropriate exchange rates, and of EUR 100,000 for investors entrusting a credit institution with securities or other financial instruments. These two guarantees offered by the Fund are different and mutually compatible.

The Management Committee of the DGF determined the annual contribution to be made at 1.8 per mille of the calculation basis for the part relating to the guarantee of deposits which, added to the 2 per mille for the part relating to the guarantee of securities, left an accrued amount at 31 December 2020 of EUR 174,320 thousand (EUR 167,261 thousand in 2019), recognised under “Other operating expenses” in the accompanying consolidated income statement (see Note 37).

At 30 July 2012, the Management Committee of the DGF agreed to recognise a shortfall among the members, payable by each through 10 equal annual instalments to be settled on the same day as the members must make their ordinary annual contributions over the next 10 years. The instalment paid at each date by the member may be deducted from the member’s annual contribution payable on the same date, as appropriate, up to the amount of this ordinary contribution. In this respect, at 31 December 2020 and 31 December 2019, the Group recognised a financial liability equal to the present value of the payment commitments assumed and to be settled in the coming years for an amount of EUR 66,613 thousand and EUR 99,919 thousand respectively and an asset account for the same amounts to recognise accrual of the payment in the consolidated income statement over the entire settlement period.

Meanwhile, Directive 2014/59/EU of the European Parliament and of the Council of 15 May 2014 establishing a framework for the recovery and resolution of credit institutions and investment firms, requires Member States, among other measures, to establish financing arrangements for the purpose of ensuring the effective application by the resolution authority of the resolution powers. With the entry into force on 1 January 2016 of Regulation (EU) No 806/2014 of the European Parliament and of the Council of 15 July 2014, the Single Resolution Board replaced the national resolution authorities and assumed management of the resolution financing arrangements of credit institutions and certain investment firms under the Single Resolution Fund (SRF) as a key element of the Single Resolution Mechanism (SRM) established through Directive 2014/59/EU. The first ex-ante contributions made by institutions to the SRF were for the 2016 contribution period.

In 2020, Bankia made a contribution to the SRF of EUR 70,509 thousand (EUR 75,062 thousand in 2019), using EUR 10,576 thousand of irrevocable payment commitments (EUR 11,260 thousand in 2019), recognising the cash collateral under “Loans and advances” and the remaining EUR 59,933 thousand (EUR 63,802 thousand in 2019) under “Other operating expenses” in the accompanying consolidated income statement (see Note 37).

(1.11) Events after the reporting period

No other significant events occurred between 31 December 2020 and the date of authorisation for issue of the accompanying consolidated financial statements other than those included in this note or other notes to the consolidated financial statements.

(1.12) Customer service department

The Bank has in place the “Customer Protection Regulations of Bankia, S.A. and its Group”, approved by the Board of Directors. Among other aspects, the Regulations stipulate that Bankia, S.A.’s Customer Service Department must address and resolve any complaints or claims submitted by those in receipt of financial services from any of the Bankia Group financial companies – one of which is the Bank – covered by the scope of the service (Bankia, S.A. and Group entities subject to Ministry of Economy Order ECO/734/2004 of 11 March on Customer Service Departments and the Financial Institution Ombudsman).

Information on the activities of Bankia, S.A.’s Customer Service Department at 31 December 2020 and 2019, as required under Ministerial Order ECO/734/2004, is included in Appendix XIII attached hereto.

(1.13) Average supplier payment period “Reporting requirement”, additional provision three of Law 15/2010, of 5 July

Information on the average supplier payment period in commercial transactions at 31 December 2020 and 2019, as required under Law 15/2010, of 5 July, is included in Appendix XIII attached hereto.

(1.14) Segment reporting and distribution of revenue from ordinary Group activities, by categories of activities and geographic markets

Segment reporting is carried out on the basis of internal control, monitoring and management of Bankia’s activity and results, and developed in accordance with the various areas of business established with regard to the Group’s structure and organisation. The Board of Directors is the chief operating decision maker of each business.

The business segments are defined bearing in mind the inherent risks and management characteristics of each. For the purposes of business segment reporting of activities and income, the core business units on which accounting and management figures are available are taken as a reference. The same general principles are applied as those used in Group management information, and the measurement, valuation bases and accounting principles applied are basically the same as those used to prepare the consolidated financial statements, with no asymmetric allocations.

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The itemised segments on which the information in these consolidated financial statements is presented at 31 December 2020 and 2019 refer to the following business areas:

- Retail Banking
- Business Banking
- Corporate Centre

The Retail Banking area includes retail banking with legal and natural persons (with annual turnover of less than EUR 6 million), Private Banking and Asset Management activity, and the Bancassurance Directorate distributed through a large multi-channel network in Spain and operating a customer-focused business model.

The Business Banking area serves legal persons with annual sales volumes of over EUR 6 million as well as the main public sector players – e.g. the State and the Autonomous Regions, among others – (Business Banking and Corporate Banking), and activities in Capital Markets (trading in derivatives, financial advisory services, loan and special finance origination, fixed income origination and trading, and distribution of fixed income products to the network), and has specialised Business Development teams (including foreign trade, products and services, business intelligence and sustainable financing). Other individuals, legal persons and self-employed persons with revenues below this threshold are served by the Retail Banking area for these purposes.

Finally, the Corporate Centre deals with any areas other than those already mentioned, including the Investees Management area, as well as "Non-current assets held for sale".

Once the composition of each business segment is defined, the following management criteria are applied to determine segment results:

- Internal transfer prices: an internal transfer price, cost or return, as appropriate, which replicates the market interest rates for the term of the various transactions, is applied to average balances of Retail Banking and Business Banking positions. The 1-month Euribor is applied to average balances of Capital Market and Corporate Centre positions.
- Cost allocations: direct and indirect costs are allocated to the different segments based on the activity carried out.

The segment reporting of interest income by geographical area for 2020 and 2019 is as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Domestic market	2,288,968	2,458,518
International market:	-	771
European Union	-	-
Other OECD countries	-	-
Other countries	-	771
Total	2,288,968	2,459,289

Geographical segment reporting regarding the Group's consolidated ordinary income for 2020 and 2019 is as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Domestic market	3,783,957	3,996,620
International market:	-	771
European Union	-	-
Other OECD countries	-	-
Other countries	-	771
Total	3,783,957	3,997,391

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Business segment reporting regarding the Group's consolidated ordinary income for 2020 and 2019 is as follows:

2020:

(in thousands of euros)				
ITEM	Retail Banking	Business Banking	Corporate Centre	Group
External customers	2,046,948	758,616	978,393	3,783,957
Inter-segment transactions	(402,645)	(81,637)	484,282	-
Total ordinary income ⁽¹⁾	1,644,303	676,979	1,462,675	3,783,957

2019:

(in thousands of euros)				
ITEM	Retail Banking	Business Banking	Corporate Centre	Group
External customers	2,076,769	698,211	1,222,411	3,997,391
Inter-segment transactions	(49,770)	(87,732)	137,502	-
Total ordinary income ⁽¹⁾	2,026,999	610,479	1,359,913	3,997,391

(1) In the table above, "Ordinary income" is understood as the balances under "Interest income", "Dividend income", "Fee and commission income", "Gains or (-) losses on financial assets and liabilities not measured at fair value through profit or loss, net", "Gains or (-) losses on financial assets and liabilities held for trading, net", "Gains or (-) losses on non-trading financial assets mandatorily at fair value through profit or loss", "Gains or (-) losses on financial assets and liabilities designated at fair value through profit or loss, net", "Gains or (-) losses from hedge accounting, net" and "Other operating income" in the accompanying income statement for 2019, which can be regarded as comparable to the Group's revenue from ordinary business.

No external customer individually represents 10% or more of the Group's ordinary income.

Profit/loss by business segment for 2020 and 2019 is as follows:

2020:

(in thousands of euros)				
ITEM	Retail Banking	Business Banking	Corporate Centre	Group
NET INTEREST INCOME	831,125	425,746	647,247	1,904,118
Dividend income	-	17	1,837	1,854
Share of profit or loss of entities accounted for using the equity method	-	-	59,749	59,749
Fee and commission income and expenses	963,484	212,669	36,653	1,212,806
+/- Gains or losses on financial assets and liabilities and exchange differences	(115)	41,511	118,761	160,157
+/- Other operating income and expenses	(168,775)	(14,771)	(66,715)	(250,261)
GROSS INCOME	1,625,719	665,172	797,532	3,088,423
Administrative expenses	(916,535)	(63,585)	(605,078)	(1,585,198)
Depreciation and amortisation	(92,337)	(2,257)	(100,778)	(195,372)
RESULTS FROM OPERATING ACTIVITIES BEFORE PROVISIONS	616,847	599,330	91,676	1,307,853
Provisions or (-) reversal of provisions	13,751	7,463	3,217	24,431
Impairment or (-) reversal of impairment on financial assets not measured at fair value through profit or loss	(286,692)	(205,644)	(551,456)	(1,043,792)
Impairment losses on other assets (net) and other gains and losses	104	10	22,887	23,001
PROFIT/(LOSS) BEFORE TAX	344,010	401,159	(433,676)	311,493

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2019:

(in thousands of euros)

ITEM	Retail Banking	Business Banking	Corporate Centre	Group
NET INTEREST INCOME	1,283,839	398,767	340,421	2,023,027
Dividend income	-	185	17,249	17,434
Share of profit or loss of entities accounted for using the equity method	-	-	60,024	60,024
Fee and commission income and expenses	870,037	178,752	31,854	1,080,643
+/- Gains or losses on financial assets and liabilities and exchange differences	524	40,398	272,387	313,309
+/- Other operating income and expenses	(158,800)	(8,469)	(82,138)	(249,407)
GROSS INCOME	1,995,600	609,633	639,797	3,245,030
Administrative expenses	(934,499)	(61,675)	(619,554)	(1,615,728)
Depreciation and amortisation	(91,778)	(1,840)	(107,334)	(200,952)
RESULTS FROM OPERATING ACTIVITIES BEFORE PROVISIONS	969,323	546,118	(87,091)	1,428,350
Provisions or (-) reversal of provisions	(3,523)	55,137	(66,166)	(14,552)
Impairment or (-) reversal of impairment on financial assets not measured at fair value through profit or loss	(287,760)	102,176	(277,357)	(462,941)
Impairment losses on other assets (net) and other gains and losses	(193)	-	(194,974)	(195,167)
PROFIT/(LOSS) BEFORE TAX	677,847	703,431	(625,588)	755,690

Segment assets and liabilities of the Group by business segment at 31 December 2020 are as follows:

(in thousands of euros)

ITEM	Retail Banking	Business Banking	Corporate Centre	Group
Financial assets at amortised cost – Loans and advances – Customers	78,820,322	38,023,482	4,150,467	120,994,271
Other assets	30,371,303	15,455,757	43,020,618	88,847,678
Total assets	109,191,625	53,479,239	47,171,085	209,841,949
Financial liabilities at amortised cost – Deposits - Customers	104,027,059	14,090,675	10,341,797	128,459,531
Net inter-segment financing	-	-	-	-
Other liabilities	5,164,566	39,388,564	23,749,055	68,302,185
Total liabilities	109,191,625	53,479,239	34,090,852	196,761,716

31 December 2019:

(in thousands of euros)

ITEM	Retail Banking	Business Banking	Corporate Centre	Group
Financial assets at amortised cost – Loans and advances – Customers	80,485,273	32,314,690	4,633,048	117,433,011
Other assets	27,275,570	13,940,844	49,818,848	91,035,262
Total assets	107,760,843	46,255,534	54,451,896	208,468,273
Financial liabilities at amortised cost – Deposits - Customers	102,368,845	11,172,148	11,243,743	124,784,736
Net inter-segment financing	-	-	-	-
Other liabilities	5,391,998	35,083,386	29,873,056	70,348,440
Total liabilities	107,760,843	46,255,534	41,116,799	195,133,176

Amounts related to investments in associates and joint ventures accounted for using the equity method, increases in non-current assets held for sale that are not financial instruments and deferred tax assets are recognised in the Corporate Centre.

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(1.15) Changes in the Group's composition

Sale of the investment in Caja de Seguros Reunidos, Compañía de Seguros y Reaseguros, S.A.

On 23 January 2020, Bankia, S.A. entered into a contract with a third party for the sale of its investment in Caja de Seguros Reunidos, Compañía de Seguros y Reaseguros, S.A. ("Caser") classified at 31 December 2019 under "Non-current assets and disposal groups classified as held for sale". The effectiveness of the aforementioned sale was subject to compliance with certain conditions precedent, such as the obtaining of regulatory authorisations from the pertinent authorities.

On 25 June 2020, after the authorisations required for the transaction had been obtained, the aforementioned sale agreement was completed. This transaction generated profit of EUR 51 million, recognised in the consolidated income statement under "Gains or (-) losses on non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations".

Merger of the insurance companies

During 2020 the merger by absorption of Caja Granada Vida, Compañía de Seguros y Reaseguros, S.A. and Cajamurcia Vida y Pensiones de Seguros y Reaseguros, S.A. (absorbed companies) into Bankia Mapfre Vida, S.A., de Seguros y Reaseguros (absorbing company) was carried out, with no significant impact on the Group's consolidated equity. At 31 December 2019 the Group held a 49% stake in both the absorbed and absorbing companies, which was classified as "Investments in joint ventures and associates - Associates". The situation regarding the investment and classification has not changed in the absorbing company at 31 December 2020.

Corporación Financiera Habana, S.A., in liquidation

During 2020 Corporación Financiera Habana, S.A. in liquidation was wound up. This investment was fully impaired at the liquidation date.

Other information

There were no significant changes in the Group's composition or scope of consolidation in 2020 other than those already described.

Appendices II, III and IV hereto provide details of companies considered as Group companies, associates and joint ventures, respectively, for the purpose of preparing these consolidated financial statements.

(1.16) Considerations on the main impacts of the COVID-19 pandemic

Details of the explanatory notes to the consolidated financial statements which disclose the most relevant effects on the consolidated financial statements as a result of the COVID-19 pandemic are as follows:

- Note 1.4 outlines the influence of the COVID-19 pandemic on the judgements and estimates made.
- Note 1.16 contains a general description and quantitative information on the measures put into place by the Group and other measures in the public domain to support families and businesses affected by the pandemic.
- Note 2.9 includes certain aspects that have been taken into consideration with regard to the impairment of financial assets.
- Note 3.2 provides information on the influence of the outbreak on liquidity risk and financing.
- Note 4 provides details of the impact of COVID-19 on the Group's capital.
- Note 5 contains considerations on the effect of the pandemic on the dividends policy.

General considerations

COVID-19 international pandemic

On 11 March 2020, the World Health Organization declared the public health emergency caused by COVID-19 to be a worldwide pandemic. This declaration led most of the governments of affected countries to take different public health measures that have included social distancing, shielding, lockdown and/or quarantine measures to varying degrees depending on each government, with limitations on the free movement of people and even border closures. These measures have evolved in line with the progression of the pandemic in each region.

The declaration of a pandemic, the uncertainty associated with how it will progress and with the development of an effective vaccine, and the exceptional containment and social distancing measures and restrictions on free movement put in place to deal with the situation have led to a major global economic slowdown on both the supply and demand sides. Businesses have faced disruption in supply chains, temporary closures and reduced demand, while households face unemployment and a drop in income. At the same time, certain stock markets have been subject to high volatility, and there is significant uncertainty about how they will perform in the short term.

National health, economic and social measures

The rapid pace at which events at Spanish and international level have unfolded has led to the need for the adoption of a number of immediate measures to tackle the unprecedented and enormous health crisis, both in terms of the number of people affected and the economic and social impact it has generated at Spanish, European and global level.

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These measures started in Spain with Royal Decree 463/2020, of 14 March, declaring a state of emergency to manage the health crisis triggered by COVID-19, which was subsequently extended to varying degrees until it was lifted on 21 June 2020.

A brief period of de-escalation and gradual recovery was then followed by a new nationwide upsurge in the pandemic in the last four months of the year, requiring new measures to be taken. These were introduced through Royal Decree 926/2020, of 25 October, declaring a state of emergency to contain the spread of infections caused by SARS-CoV-2, which also newly declared a state of emergency until 9 November 2020, which was in turn subsequently extended until 9 May 2021 by virtue of Royal Decree 926/2020, of 3 November.

Following on from the foregoing measures, the Spanish government has enacted various regulations to deal with the health crisis and its economic and social impact and to protect and revive employment and economic activity, both at national level and through certain measures at sector level, the most important of which are discussed below.

These regulations have in turn been accompanied by others initiated by other public authorities and regional bodies, mainly regional governments and city councils.

Bankia's contingency plan

Against this backdrop, since the beginning of the crisis the Bank has adopted numerous operational and contingency-based measures, including:

- Setting up a Contingency Committee made up of various executives and members of senior management, which has monitored the situation on a daily basis, coordinating the actions carried out in different areas during the most critical months of the pandemic.
- Establishment of Coronavirus prevention and protection protocols, periodically updated in coordination with the health authorities and complemented by various internal guides, all of which are centralised in a single COVID-19 space for employees.
- Measures to ensure critical functions, identifying critical own and third-party services and establishing diversification plans, appropriating new funds to infrastructure to cater to the increase in online activity of both Bankia's customers and employees – including the provision of mobile devices and portable equipment – and reinforcing cyber security measures.
- Measures with suppliers and employees, both preventive (not allowing the presence of non-critical suppliers in corporate buildings, closing common at-risk spaces, transferring COVID protocols to lessors and lessees, etc.) and protective (PPE, face masks, hand gel, protective shields, etc.).
- Various prevention and work-life balance measures based on workplace characteristics, ranging from rotating shifts to remote work for a significant number of Bankia professionals, especially those in corporate buildings, which has reached nearly 95% for central services and 40% for the network.
- During the process, Bankia has been in permanent contact with the health authorities, has received advice from QUIRON Prevención and has held numerous meetings with the State Health and Safety Committee to keep this committee informed at all times of the measures adopted and to analyse the proposals made by the workplace labour union branches.

Bankia has secured the COVID-19 secure protocol certificate from APPLUS+ CERTIFICATION, an independent certification entity.

Financial support measures

Public measures to provide financial support to families and businesses

Royal Decree-Law 8/2020, of 17 March, on extraordinary urgent measures to address the economic and social impact of COVID-19 ("RDL 8/2020") provides, inter alia, for a moratorium (public or legislative moratorium) on the payment of mortgage loan instalments for the acquisition of a principal residence and property relating to the economic activity of entrepreneurs and professionals for economically vulnerable people affected by COVID-19, as well as the approval of a line of State guarantees to support lending to companies and self-employed workers, the granting of which is subject to meet certain requirements.

Royal Decree-Law 11/2020, of 31 March, which adopts urgent complementary social and economic measures to deal with COVID-19 ("RDL 11/2020") completed the first raft of measures, extending the moratorium mechanism on payment of instalments to other types of financing, such as consumer credit. In addition, the line of State guarantees was extended to economically vulnerably households as a result of the COVID-19 crisis to provide financing to pay rent for their primary residence.

If the established requirements are met, the public moratoriums relating to RDL 8/2020 and RDL 11/2020 grant a three-month grace period, with the suspension of payment of instalments and any item comprising them during the period of validity, as well as a freeze on the accrual of interest during such period.

Through the Spanish Ministry of Economic Affairs and Digital Transformation and managed by the Spanish Official Credit Institute (ICO), the line of State guarantees seek, if the requirements are met, to ensure that new or renewed loans are secured by the State for a maximum period of up to five years.

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In addition, Royal Decree-Law 25/2020, of 3 July, on urgent measures to support economic recovery and employment, establishes a 12-month moratorium for borrowers in financing transactions linked to tourism-related property who, after meeting certain conditions, have undergone financial difficulties as a result of COVID-19.

Royal Decree-Law 26/2020, of 7 July, on economic reactivation measures to deal with the impact of COVID-19 in transport and housing, introduces measures for a six-month postponement of payments relating to loans, finance leases and operating leases that self-employed workers and companies engaging in road transport, and meeting a number of requirements, use to purchase vehicles.

In view of the lingering effects of the crisis, Royal Decree-Law 34/2020, of 17 November, on urgent measures to provide support for business solvency, the energy sector and in tax matters, brought in new measures aimed at mitigating the liquidity problems of businesses and self-employed professionals, thus maintaining the line of business solvency support provided for in the previous royal decrees. Such measures include the following: the deadline for the granting of public guarantees to address the liquidity needs of self-employed workers and businesses has been extended from 31 December 2020 to 30 June 2021; borrowers with a loan that has a public guarantee under Royal Decree-Law 8/2020 may apply for an extension to the loan due date, as well as an extension on the public guarantee by the same amount of time; customers that meet the eligibility requirements laid down in the Royal Decree-Law may obtain an extension of the grace period for repayment of the principal of the guaranteed loan – whether the guarantee was delivered under Royal Decree-Law 8/2020 or under Royal Decree-Law 25/2020 – for a maximum period of 12 months, thus allowing for a maximum total grace period of 24 months; financial institutions are required to uphold working capital financing facility limits until 30 June 2021 for all customers that meet the eligibility requirements and have been granted a loan that is guaranteed under either Royal Decree-Law 8/2020 or Royal Decree-Law 25/2020.

Lastly, and consistent with the prolonged effects of the pandemic, “Royal Decree-Law 3/2021, of 2 February, introducing measures to reduce the gender gap and other Social Security and economic measures”, has extended the deadline to apply for public moratoriums until 30 March 2021. It moreover stipulates a maximum cumulative duration of nine months for those applied for since 30 September 2020, including any moratoriums granted previously, and allows for a transitional regime for those granted between 30 September and the date on which the Royal Decree-Law came into force, for which the duration initially granted may be maintained

Private financial support measures for Bankia customers

As a complementary measure, on 16 April 2020 the CECA banking association resolved to reach a sector agreement (sector-specific or private moratorium) that aims to create a common framework establishing the general criteria for deferral of payment by certain borrowers affected by the health and economic crisis – those who are unable to qualify for the public moratorium and therefore cannot benefit from it, or for those whose capacity proves insufficient – allowing for the deferral of payments within a specific period. As a member of CECA, Bankia is one of the entities adhering to the aforementioned sector-specific moratorium.

The transactions modified under this agreement allow for the suspension of principal payments during the period of validity – 12 months for loans or credits with mortgage guarantee and 6 months for personal loans – with the customer assuming the payment of interest on the outstanding principal over the duration thereof.

On 22 June 2020, it was agreed to extend the term of this sector agreement until 29 September 2020.

On 15 December 2020, an addendum was executed for the purpose of adapting the sector agreement of 16 April and its amendment of 22 June 2020, in line with how the pandemic was unfolding and the guidelines issued by regulators. This introduced the possibility of applying for new moratoriums by 31 March 2021 at the latest for a term of up to nine months in transactions with mortgage guarantee and up to six months in transactions with personal guarantee. Moreover, the addendum provides that moratoriums applied for by the entities adhering to the agreement and their customers between 30 September 2020 and the date of the addendum, and which have been granted, shall be deemed to be protected under the sector agreement, provided that they meet the terms and conditions laid down in the agreement and the deadlines stipulated in the addendum are met.

Bankia has also implemented other measures such as the advance payment of pensions and unemployment benefits, extended repayment terms for short-term loans, the granting of bridge loans until customers obtain the new State-guaranteed liquidity lines through the ICO and flexible fee collection.

Quantitative information on public and sector-specific financial support measures

Nearly 113,000 transactions associated with the aforementioned moratoriums have been granted at 31 December 2020 for a gross carrying amount of approximately EUR 5,625 million, of which nearly of Euros 3,400 million are legislative moratoriums related to transactions secured by a mortgage, of Euros 375 million are legislative moratoriums related to transactions not secured by a mortgage, and approximately of Euros 1,850 million are sector-specific moratoriums. The outstanding balance on these transactions at 31 December 2020 is approximately EUR 4,600 million. Almost all the financing was granted to households, 89% of which was secured by a mortgage and 87% of which matured at less than six months, and most of the balances were classified as performing.

At 31 December 2020 the amount drawn down on the new loans extended and backed by a public guarantee is in excess of EUR 8,200 million, approximately. Of this balance, more than 95% corresponds to companies, of which approximately 69% are SMEs. Approximately 75% of the amount of these transactions is secured.

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During the year ended 31 December 2020 the Group has recognised a negative amount of Euros 13 million in the consolidated income statement as a result of adjusting the carrying amount of the transactions modified under a legislative moratorium to the renegotiated cash flows.

Other considerations

Against the current backdrop and in order to provide the greatest possible certainty in this unprecedented situation, the competent authorities and accounting and prudential bodies (IASB, BoE, EBA, ECB, ESMA, etc.) have made various pronouncements to draw attention to the margin of flexibility granted by the regulatory framework in force to support the economy in the particular and extraordinary circumstances caused by the spread of COVID-19. This is without foregoing a prudent approach, through the appropriate identification and classification of transactions and a reasonable estimate of the related credit risk coverage (see Note 2.9), or the capital and liquidity measures carried out (see Note 4 and Note 3.2, respectively).

As regards the recognition of credit risk in the current environment, the accounting treatment applied by the Bankia Group complies with the current accounting and prudential framework and is aligned with the pronouncements made by the various regulators and supervisors so as to ensure the strict and immediate recognition of transactions of which impairment is evidenced to be non-temporary (see Note 2.9).

Furthermore, Notes 3.2 and 4 provide additional information on liquidity risk management and capital management, respectively, in relation to COVID-19.

(1.17) Joint Merger Plan between Caixabank and Bankia

At their General Meeting on 1 December 2020, the Bank's shareholders resolved to approve the merger by absorption of Bankia ("Bankia" – absorbed company) into Caixabank, S.A. ("Caixabank" – absorbing company), with the termination of Bankia, via dissolution without liquidation, and the transfer of all of its assets and liabilities as a whole to Caixabank, which will thus acquire, by universal succession, all of the assets and liabilities and the rights and obligations of the absorbed company (the "Merger"), under the terms and conditions envisaged in the joint merger plan signed by the directors of Caixabank and Bankia on 17 September 2020 (the "Joint Merger Plan"). To this end, and pursuant to Law 3/2009, of 3 April, on structural changes to companies ("Law 3/2009") and other applicable legislation, the following resolutions, inter alia, were adopted as part of a single transaction:

- Approval of the replacement of Bankia's merger balance sheet by its half-yearly financial statement at 30 June 2020 required by the legislation governing the stock market, made public by Bankia on 31 July 2020 and on which KPMG Auditores, S.L., the auditor of Bankia's accounts, duly issued their assurance on 28 July 2020, such statement being approved for the pertinent purposes.
- Approval of the Joint Merger Plan in its entirety and without amendment, and such has been the case for the pertinent purposes. As provided in article 32 of Law 3/2009, the Joint Merger Plan has been available on the corporate website of Bankia (www.bankia.com) and that of Caixabank (www.caixabank.com) since 18 September 2020. Moreover, on 23 October 2020, BDO Auditores, S.L.P., as the independent expert appointed by the Mercantile Registry of Valencia, issued the required report on the Joint Merger Plan, in accordance with article 34 of Law 3/2009.
- Approval of the merger agreement in accordance with article 40 of Law 3/2009 and article 228 of the Mercantile Registry Regulations, the merger by absorption of Bankia into CaixaBank strictly adhering to the terms and conditions of the Joint Merger Plan. The following circumstances, inter alia, associated with the Joint Merger Plan are also noted, without prejudice to the rest of the circumstances thereof that have also been approved and replicated for the pertinent purposes:
 - The exchange ratio for the shares of the merging entities, which was determined on the basis of the actual value of the net assets of CaixaBank and Bankia, will be 0.6845 newly issued shares of CaixaBank, of the same characteristics and with the same rights as the existing CaixaBank shares at the date of their issue, for each share of Bankia, of EUR 1 par value each.
 - Provided the prior legal requirements have been fulfilled, the exchange of Bankia shares for CaixaBank shares will take place once the merger has been approved by the shareholders of Bankia and Caixabank at their general meetings (this condition was met on 1 and 3 December 2020, respectively) the conditions precedent referred to hereafter have been met; the notarial instrument of Merger and the corresponding capital increase in Caixabank have been executed; and such notarial instrument of Merger has been filed at the Mercantile Registry of Valencia. The aforementioned exchange of shares will be carried out as of the date indicated in the prospectus to be published in accordance with the applicable legislation.
 - The date from which the operations of the absorbed company shall be deemed, for accounting purposes, to be performed by the absorbing company shall be the date resulting from the application of International Financial Reporting Standard (IFRS) 3, rule 44 of Bank of Spain Circular 4/2017 of 27 November, to credit institutions, on public and confidential

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financial reporting rules and formats; and recognition and measurement standard 19 of the Spanish General Chart of Accounts approved by Royal Decree 1514/2007, of 16 November.

- In accordance with these regulations, the effective date of the Merger for accounting purposes shall be the date on which, once the shareholders of Caixabank and Bankia have approved the Merger at their respective general meetings, the last of the administrative authorisations required for the Merger to take effect is obtained, as this is the date on which the absorbing company is deemed to have acquired control of the absorbed company.
- Approval for the Merger to avail of the special tax regime provided for in Chapter VII of Title VII and in additional provision two of Corporate Income Tax Law 27/2014, of 27 November.

The approval of the merger agreement described above has not brought to light any relevant aspects that would need to be disclosed or would have a significant impact on these consolidated financial statements from an accounting perspective.

At the date of authorising these consolidated financial statements for issue, the administrative authorisations required for the Merger to take effect, as stipulated in the Joint Merger Plan, have not been obtained, neither have the pertinent bodies expressed their opposition, as the case may be.

(2) Principles, accounting policies and measurement bases applied

A summary of the main accounting policies and measurement bases applied to prepare the Bankia Group's consolidated financial statements for the year ended 31 December 2020 is as follows:

(2.1) Business combinations and consolidation

(2.1.1) Business combinations

A business combination is a transaction or another event in which the acquirer obtains control over one or more businesses. For these purposes, an entity controls another entity when it has the power to govern its financial and operating policies, as stipulated by law, the bylaws or agreement, so as to obtain economic benefits from its activities.

A business is defined as an integrated set of activities and assets that is capable of being conducted and managed for the purpose of providing goods or services to customers, thus providing a return for the Bank in the form of interest, dividends or other types of income from its core activities.

In particular, obtaining control over an entity is considered a business combination.

The business combinations through which the Group obtains control over an entity or economic unit are recognised for accounting purposes using the acquisition method, the main phases of which are summarised as follows:

- Identify the acquirer.
- Determine the acquisition date.
- Recognise and measuring the identifiable assets acquired, the liabilities assumed and any non-controlling interest in the acquiree. Other than the exceptions mentioned in IFRS 3, in general, the identified assets, liabilities and contingent liabilities of the entity or business acquired are measured at fair value when control is acquired.
- Recognise and measure goodwill or a gain from a bargain purchase in the consolidated income statement by comparing the price paid in the business combination and the initial value of the identifiable assets, liabilities and contingent liabilities of the acquiree.

In those situations in which the Group obtains control of an acquiree in which it holds an equity interest immediately prior to the acquisition date (a business combination achieved in stages), its equity interests in the acquiree, previously held at their acquisition-date fair values, are remeasured and the resulting gains or losses, if any, are recognised in the consolidated income statement.

In the case of business combinations carried out without transferring consideration, such as business combinations achieved by contract alone, the Group recognises, where applicable, the amount of the net assets and liabilities of the acquiree applying the policies and principles contained in IFRS 3 (in general and with the exceptions established in IFRS 3) at fair value in the Group's equity, such that any goodwill or gains arising from the purchase are not recognised in business combinations of this type.

(2.1.2) Basis of consolidation

For the purposes of consolidation and in accordance with the criteria set out in IFRS 10 Consolidated Financial Statements, IFRS 11 Joint Arrangements and IAS 28 Investments in Associates and Joint Ventures, the Group is composed of four types of companies: subsidiaries, joint ventures, associates and structured entities, defined as follows:

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(2.1.2.1) Subsidiaries

Subsidiaries are companies over which the Group has control. Control over an investee is understood as the exposure, or rights, to variable returns from involvement with the investee and the ability to use power over the investee to affect the amount of investor returns.

Consideration as a subsidiary requires:

- Power: An investor has power over an investee when the investor has existing rights that give it the current ability to direct the relevant activities; i.e. the activities that significantly affect the investee's returns;
- Returns: An investor is exposed, or has rights, to variable returns from its involvement with the investee when the investor's returns from its involvement have the potential to vary as a result of the investee's performance. The investor's returns can be only positive, only negative or both positive and negative.
- Link between power and returns: An investor controls an investee if the investor not only has power over the investee and exposure or rights to variable returns from its involvement with the investee, but also has the ability to use its power to affect the investor's returns from its involvement with the investee.

The financial statements of subsidiaries are fully consolidated with those of the Bank, except those of subsidiaries classified as non-current assets held for sale, which are recognised and measured as described in Note 2.20.

The share of non-controlling interests of subsidiaries in the Group's consolidated equity are presented under "Minority interests [non-controlling interests]" on the consolidated balance sheet, while their share of profit and losses is presented under "Profit or loss - Attributable to minority interests [non-controlling interests]" in the consolidated income statement (see Note 24).

When companies are acquired during the year, only the profit/loss from the date of acquisition until the close of that year is consolidated.

Accordingly, the profit/loss of companies disposed of during the year is consolidated only from the beginning of the year until the disposal date.

Appendix II contains significant information on these entities.

(2.1.2.2) Joint ventures

These are entities over which there is a contractually agreed sharing of control. A joint arrangement is a contractual agreement giving two or more entities, or "parties", control of an activity subject to joint control. In a joint arrangement, no party has control over the arrangement, but rather control is shared with the other parties, which implies, contractually, that decisions about the relevant activities require the unanimous consent of the parties that share control. There are different types of joint arrangements, but they can be grouped as follows:

- A joint operation, whereby the parties that have joint control of the arrangement have rights to the assets, and obligations for the liabilities, relating to the arrangement. It may be structured through a separate vehicle or not. In the consolidated financial statements, a joint operator recognises, according to their nature and in accordance with the applicable IFRS:
 - its assets, including its share of any assets held jointly;
 - its liabilities, including its share of any liabilities incurred jointly;
 - its revenue from the sale of its share of the output arising from the joint operation;
 - its share of the revenue from the sale of the output by the joint operation, and
 - its expenses, including its share of any expenses incurred jointly.
- A joint venture, in which the parties that have joint control of the arrangement have rights to the net assets of the arrangement. Joint ventures must necessarily be structured in a separate vehicle. A joint venturer must recognise its interest in the joint venture as an investment and account for this investment using the equity method in accordance with IAS 28.

The assets and liabilities assigned to jointly controlled operations and the assets controlled jointly with other venturers are recognised on the consolidated balance sheet, classified according to their specific nature. Similarly, the Group's share of the income and expenses of joint ventures is recognised in the consolidated income statement on the basis of the nature of the related items.

The financial statements of the joint ventures ("jointly controlled entities") are consolidated with those of the Bank using the equity method, except those classified as non-current assets held for sale, which are recognised and measured as described in Note 2.20.

Appendices III and IV attached hereto contain significant information on these companies.

(2.1.2.3) Associates

Associates are entities over which the Bank has significant influence, but not control or joint control.

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Such influence is usually evidenced by a direct or indirect holding of 20% or more of the investee's voting rights.

In the consolidated financial statements, investments in associates are accounted for using the equity method, as defined by IAS 28 except those classified as non-current assets held for sale, which are recognised and measured as described in Note 2.20.

Relevant information on these entities is provided in Appendices III and IV.

At 31 December 2020, the Group's investments in entities in which it holds an equity interest of over 20% that have not been classified as investments in associates on the consolidated balance sheet are immaterial and relate primarily to entities under the management of an insolvency administrator.

(2.1.2.4) Structured entities

A structured entity is an entity that has been designed so that voting or similar rights are not the dominant factor in deciding who controls the entity, such as when any voting rights relate to administrative tasks only and the relevant activities are directed by means of contractual arrangements. A structured entity often has some or all of the following features or attributes:

- Restricted activities.
- A narrow and well-defined objective, such as to effect a tax-efficient lease, carry out research and development activities, provide a source of capital or funding to an entity or provide investment opportunities for investors by passing on risks and rewards associated with the assets of the structured entity to investors.
- Insufficient equity to permit the structured entity to finance its activities without subordinated financial support.
- Financing in the form of multiple instruments contractually linked to investors, which create concentrations of credit or other risks (tranches).

Examples of entities that are regarded as structured entities include, but are not limited to:

- Securitisation vehicles.
- Asset-backed financing.
- Some investment funds.

In those cases where the Group creates, or has interests in, entities designed to provide investment opportunities for customers or to transfer risks or for other purposes, it determines whether control exists over the investee using internal criteria and procedures and related regulations, and, therefore, whether it should or should not be consolidated.

These methods and procedures determine the existence of control by considering how decisions are taken regarding relevant activities and whether there is exposure to variability of returns and if there is a link between power and returns.

Consolidated structured entities

These entities include the so-called "asset securitisation funds" and vehicles, created to provide investment opportunities to customers or to transfer risks or for other purposes, and are fully consolidated where, based on analysis, it is concluded that the Group has control.

In the specific case of the securitisation funds to which Group entities transfer lending portfolios, when assessing whether the Group has control, the following circumstances which indicate control are considered:

- The activities of the securitisation funds are carried out on behalf of the entity, in accordance with the specific needs of the business, such that it obtains benefits or advantages from the activities of the securitisation funds.
- The entity retains decision-making power to obtain most of the benefits of the activities of the securitisation funds or delegates this power through an "automatic pilot" mechanism (securities funds are structured such that all decisions and activities have been predefined before their creation).
- The entity has rights to the majority of the benefits of the securitisation funds and, therefore, is exposed to the risks inherent in its activity. The entity retains most of the residual benefits of the securitisation funds.
- The entity retains most of the risks of the securitisation funds' assets.

If control is determined to exist on the basis of these indicators, the securitisation funds are included in the consolidated Group.

The Group determined that in none of the securitisations carried out since 1 January 2004 could the securitised assets be derecognised from the consolidated balance sheet, and that the funds should be consolidated, as the Group manages the impairment of collateral and substantially retains the expected credit losses and possible variations in net cash flows through subordinated financing and credit facilities in favour of the securitisation funds (see Notes 2.2.2 and 12.7). However, if the entity substantially transfers these risks, it derecognises these assets.

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Unconsolidated structured entities

The Group has vehicles for the purpose of providing investment opportunities to customers, transferring risks or for other purposes. These vehicles are not consolidated as the Group does not have control and as they do not meet the criteria for consolidation set forth in IFRS 10. The amount of the assets and liabilities of these vehicles is not material in relation to the Group's consolidated financial statements.

(2.1.2.5) Changes in levels of investments in subsidiaries, joint ventures and associates, and related impairment

Subsidiaries

Acquisitions and disposals that do not result in a change of control are accounted for as equity transactions, and gains and losses are not recognised in the income statement. Initially recognised goodwill is not remeasured. The difference between the consideration paid or received and the decrease or increase in the amount of non-controlling interests, respectively, is recognised in reserves. Similarly, if a parent loses control of a subsidiary, it derecognises the assets, liabilities and non-controlling interests and any other items that could be recognised in valuation adjustments of the former subsidiary and recognises the fair value of the consideration received and any investment retained at the reclassification date. The difference between these amounts is recognised in the income statement.

Joint ventures and associates

At the date on which joint control or significant influence is obtained, the Group estimates the fair value of the investment, which from that time is considered to be its cost, recognising any gains or losses deriving from differences between its carrying amount before joint control or significant influence was obtained and its fair value through profit or loss. The cumulative gain or loss in accumulated other comprehensive income in consolidated equity is retained until the investment is disposed of, whereupon it is reclassified to reserves.

Investments that give rise to a situation of joint control or significant influence are accounted for using the equity method from the date they become a joint venture or associate. The difference between the cost of the investment and the Group's share of the net fair value of the investee's identifiable assets and liabilities is accounted for as follows:

- Goodwill relating to the joint venture or associate is included in the carrying amount of the investment.
- Any excess of the net fair value of the investee's identifiable assets and liabilities over the cost of the investment is recognised as income in the consolidated income statement in the year in which joint control or significant influence is obtained.

Additionally, when joint control or significant influence in a joint venture or associate is lost, the retained investment is accounted for in a similar manner to a subsidiary; i.e. as an asset at fair value. The difference between the carrying amount and fair value is recognised in profit or loss. The irrevocable option of including the investment in the portfolio of financial assets at fair value through other comprehensive income is not available for investments originally measured at fair value through profit or loss.

Impairment losses for the period are recognised as an expense in the consolidated income statement, with a balancing entry in the carrying amount of the asset. Subsequent reversals are recognised as income in the consolidated income statement.

Indications of objective evidence of impairment for these investments include:

- Significant financial difficulty of the issuer.
- Significant changes in the technological, market, economic or legal environment in which the issuer operates, which may have adverse effects on the recovery of the investment.
- A significant or prolonged decline in the fair value of an asset below its carrying amount. In these cases, a test should be carried out to assess whether the indications are clear evidence of impairment.

There is also objective evidence of impairment when the issuer has entered, or it is probable that it will enter, into a creditors' agreement.

The Group recognises impairment losses on these investments provided that there is objective evidence that the carrying amount of an investment is not recoverable. The amount of the impairment losses is the difference between the carrying amount of an instrument and its recoverable amount. Recoverable amount is the higher of fair value less costs to sell and the present value of future cash flows (value in use).

(2.2) Financial instruments

(2.2.1) Initial recognition of financial instruments

Financial instruments are initially recognised on the consolidated balance sheet when the Group becomes a party to the contract in accordance with the provisions thereof. Specifically, debt instruments, such as loans and cash deposits, are recognised from the date on which the legal right to receive or the legal obligation to pay cash arises. Derivative financial instruments are generally recognised from the trade date.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

A regular way purchase or sale of financial assets, defined as one in which the parties' reciprocal obligations must be discharged within a time frame established by regulation or convention in the marketplace and that may not be settled net, such as stock market and forward currency purchase and sale contracts, is recognised on the date from which the rewards, risks, rights and duties attaching to all owners are for the purchaser, which, depending on the type of financial asset purchased or sold, may be the trade date or the settlement or delivery date. In particular, transactions performed in the currency market and equity instruments traded in Spanish secondary securities markets are recognised on the trade date, and debt instruments traded in these markets are recognised on the settlement date.

(2.2.2) Derecognition of financial instruments

A financial asset is derecognised when any of the following conditions arise:

- The contractual rights to the cash flows from the financial asset expire; or
- The financial asset and substantially all the significant risks and rewards associated therewith are transferred, or although these are neither substantially transferred nor retained, control over the financial asset is transferred (see Note 2.7).

Financial liabilities are derecognised from the consolidated balance sheet when the obligations are extinguished or when they are repurchased by the Group with the intention either to resell them or to cancel them.

(2.2.3) Fair value and amortised cost of financial instruments

The fair value of a financial instrument on a specific date is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The most objective and common reference for the fair value of a financial instrument is the price that would be paid for it on an organised, transparent and deep market ("quoted price" or "market price").

The Group measures daily all the positions that must be recognised at fair value based either on available market prices for the same instrument, or on valuation techniques considered appropriate in the circumstances and which maximise the use of observable market inputs or, where applicable, on the best available information, using assumptions that market agents would apply to measure the asset or liability assuming they are acting in their best interest.

Note 25 provides information on the fair value of the Group's main assets and liabilities at 31 December 2020 and 2019.

Amortised cost is understood to be the acquisition cost of a financial asset or liability plus or minus, as appropriate, the principal repayments and interest payments, and plus or minus, as appropriate, the cumulative amortisation, using the effective interest method, of any difference between the initial amount and the maturity amount of the financial instruments, and in the case of financial assets, adjusted for any loss allowance.

The effective interest rate is the rate that exactly discounts all estimated future cash payments or receipts through the expected life of a financial instrument to the initial value of the financial instrument, without considering expected credit losses. For fixed rate financial instruments, the effective interest rate coincides with the contractual interest rate established on the acquisition date adjusted, where applicable, for the fees and transaction costs that, pursuant to IFRS 9, must be included in the calculation of the effective interest rate. In the case of floating rate financial instruments, the effective interest rate is determined in a similar fashion to fixed rate transactions and is recalculated on the date of every revision of the contractual interest rate of the transaction, taking into account any changes in the future cash flows.

(2.2.4) Classification and measurement of financial assets and liabilities

Financial instruments are classified in the Group's consolidated balance sheet as follows:

- **Financial assets at amortised cost:** financial assets classified in this category present contractual terms that result in cash flows that are solely payments of principal and interest on the principal amount outstanding and are managed within a business model whose objective is to hold assets to collect their contractual cash flows.

This category includes debt securities, financing granted to third parties in connection with ordinary lending activities carried out by Group companies and receivables from purchasers of their goods and users of their services, provided the assets are managed within a business model of holding the financial assets in order to collect their contractual cash flows and the cash flows are solely payments of principal and interest on the principal amount outstanding. It also includes finance lease transactions in which the Group acts as the lessor.

Financial assets included in this category are initially measured at fair value, adjusted to reflect transaction costs that are directly attributable to the acquisition of the financial asset, which are taken to consolidated profit or loss until maturity using the effective interest method. Unless there is evidence to the contrary, the fair value at initial recognition is the transaction price; i.e. the fair value of the consideration given.

As an exception to the preceding paragraph, trade receivables that do not contain a significant financing component are measured initially at their transaction price. In addition, trade receivables that have a significant financing component with an original maturity of less than one year may be recognised initially at their transaction price.

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Assets acquired at a discount are measured at the cash amount paid and the difference between their repayment value and the amount paid is recognised as finance income using the effective interest method during the remaining term to maturity.

Subsequently, all financial assets included in this category are measured at their amortised cost, calculated using their effective interest rate.

When the contractual cash flows are renegotiated or modified in such a way that they do not result in a financial asset being derecognised as a result of a substantial modification, the Group recalculates the gross carrying amount of the financial asset as the present value of the renegotiated contractual cash flows discounted at the original effective interest rate. The difference between the gross carrying amount before and after the modification is recognised under "Impairment or (-) reversal of impairment on financial assets not measured at fair value through profit or loss and modification losses or (-) gains, net" in the consolidated income statement.

In this connection, the Bankia Group considers that, in general, the modifications in the contractual cash flows from loans subject to renegotiation under a public or sector-specific moratorium, which are temporary and linked to the COVID-19 pandemic, are not substantial.

The interest accrued on these assets from their initial recognition, calculated using the effective interest method, is recognised under "Interest income" in the consolidated income statement. Exchange differences on securities included in this portfolio denominated in currencies other than the euro are recorded as set out in Note 2.4. Any impairment losses on these assets are recognised as set out in Note 2.9. Debt securities included in fair value hedges are recognised as set out in Note 2.3.

- **Financial assets at fair value through other comprehensive income:** this category includes debt securities whose contractual terms result in cash flows that are solely payments of principal and interest on the principal amount outstanding, are managed within a business model whose objective is to hold assets to collect their contractual cash flows and give rise to cash flows from the sale of those assets.

It also includes equity instruments that are not related to subsidiaries, joint ventures or associates, voluntarily and irrevocably designated initially in this category and that shall not be classified as held for trading.

The instruments included in this category are initially measured at fair value adjusted by the transaction costs that are directly attributable to the acquisition of the financial asset, which are recognised, until maturity, in the consolidated income statement using the effective interest method, except for those of financial assets with no fixed maturity, which are recognised in the income statement when these assets become impaired or are derecognised.

After acquisition, the financial assets included in this category are measured at fair value.

Changes in the fair value of financial assets classified as at fair value through other comprehensive income are recognised with a balancing entry in "Accumulated other comprehensive income" on the consolidated balance sheet until the financial asset is derecognised, whereupon they are reclassified to the consolidated income statement for the year, in the case of debt instruments, or to in an item of reserves, in the case of investments in equity instruments. Any impairment losses on these instruments are recognised as set out in this Note. Exchange differences on financial assets denominated in currencies other than the euro are recorded as set out in Note 2.4. Changes in the fair value of financial assets hedged in fair value hedges are recognised as explained in Note 2.3.

The interest accrued on debt instruments calculated using the effective interest method is recognised under "Interest income" in the consolidated income statement. Dividends accrued on equity instruments classified in this category are recognised under "Dividend income" in the consolidated income statement.

- **Financial assets and financial liabilities mandatorily at fair value through profit or loss:** this category includes financial instruments classified as held for trading and non-trading financial instruments mandatorily measured at fair value through profit or loss:
 - **Financial assets held for trading:** those acquired for the purpose of selling them in the near term or that are part of a portfolio of identified financial instruments that are managed together and for which there is evidence of a recent actual pattern of short-term profit-taking, and derivatives that have not been designated as hedging instruments, including those separated from hybrid financial liabilities.
 - **Financial liabilities held for trading:** those that have been issued with an intention to repurchase them in the near term or that form part of a portfolio of identified financial instruments that are managed together and for which there is evidence of a recent pattern of short-term profit taking; short positions arising from financial asset sales under non-optional repurchase agreements or borrowed securities received on loan or as collateral with the right to sell, and derivatives not designated as hedging instruments, including those separated from hybrid financial liabilities pursuant to applicable regulations.
 - **Non-trading financial assets mandatorily at fair value through profit or loss:** including debt instruments that cannot be classified as at amortised cost or at fair value through other comprehensive income because, due to their contractual terms, they give rise to cash flows that are not solely payments of principal and interest on the principal amount outstanding.

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This category also includes equity instruments that are not related to subsidiaries, joint ventures or associates that should not be classified as held for trading and have not been voluntarily and irrevocably designated initially at fair value through other comprehensive income.

- **Financial assets and financial liabilities designated at fair value through profit or loss:** these include, among others, financial instruments designated voluntarily and irrevocably initially at fair value through profit or loss if doing so eliminates or significantly reduces accounting mismatches, and hybrid instruments composed simultaneously of an embedded derivative and a host financial liability not held for trading that meets the requirements for accounting for the embedded derivative separately from the host financial instrument.

Financial assets and liabilities classified as held for trading, non-trading financial assets mandatorily at fair value through profit or loss, and financial assets and financial liabilities designated at fair value through profit or loss are measured initially at fair value, and any subsequent changes in fair value are recognised with a balancing entry in "Gains or losses on financial assets and liabilities held for trading, net", "Gains or losses on non-trading financial assets mandatorily at fair value through profit or loss, net" and "Gains or losses on financial assets and liabilities designated at fair value through profit or loss, net", respectively, in the consolidated income statement, except for fair value changes due to returns accrued on the financial instrument other than from trading, which are recognised under "Interest income", "Interest expenses" or "Dividend income" in the consolidated income statement, depending on their nature. Returns on debt instruments included in this category are calculated using the effective interest method.

The amount of the change in fair value attributable to changes in the credit risk of financial liabilities designated at fair value through profit or loss is recognised in "Accumulated other comprehensive income" on the consolidated balance sheet, unless it would create or enlarge an accounting mismatch, which must be appropriately documented and justified. In this case, the Group may elect to recognise the full amount of the change in fair value initially and definitively in profit or loss.

- **Financial liabilities at amortised cost:** these include financial liabilities not included in any of the preceding categories.

The liabilities issued by consolidated entities which, although considered capital for legal purposes, do not meet the requirements for classification as equity; i.e. basically any shares issued by the consolidated entities that do not carry voting rights and entitle their holders to receive dividends if certain conditions are met, are accounted for in the same way as the rest of the financial liabilities classified as at amortised cost, and are recognised under "Financial liabilities at amortised cost - Debt securities issued" on the consolidated balance sheet. This category also includes financial liabilities arising from issues of contingent convertible bonds convertible into ordinary Bankia shares.

Financial liabilities at amortised cost are initially measured at fair value adjusted by the amount of transaction costs that are directly attributable to the issue of the financial liability, which are allocated to the consolidated income statement until maturity using the effective interest method defined in prevailing regulations. They are subsequently measured at amortised cost using the effective interest method.

The interest accrued on these liabilities from initial recognition, calculated using the effective interest method, is recognised under "Interest expenses" in the consolidated income statement, except for coupons accrued on the issuance of contingent bonds convertible into ordinary Bankia shares, which are recognised in equity as they are payable at the Group's discretion. Exchange differences on liabilities denominated in currencies other than the euro are recorded as set out in Note 2.4. Financial liabilities included in fair value hedges are recognised in accordance with Note 2.3.

Assessment of business models

The business model refers to how the Group manages its financial assets in order to generate cash flows. The assessment of the business model of the various financial assets recognised on the balance sheet is performed at the level that best reflects how groups of financial assets are managed together to achieve a particular objective.

Accordingly, the assessment is not carried out on an instrument-by-instrument basis, but rather on a higher level of aggregation, based on the following factors:

- How the performance of the business model and the financial assets held within that business model are evaluated and reported to management.
- The risks that affect the performance of the business model and the way in which those risks are managed.
- How managers and management in charge of these businesses models are compensated.

Contractual cash flow characteristics

The second step in the process carried out by the Group to classify financial assets is to assess whether the contractual cash flows that are solely payments of principal and interest on the principal amount outstanding are consistent with a basic lending arrangement. This assessment is carried out through an 'SPPI test' (Solely Payments of Principal and Interest).

In a basic lending arrangement, consideration for the time value of money and credit risk are typically the most significant elements of interest, although interest also includes the consideration for other risks (e.g. liquidity risk) and costs. To perform the SPPI test, the Group evaluates the facts and circumstances affecting the instrument. Key considerations include:

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- Contractual terms that change the timing or amount of contractual cash flows: the existence of contingent events that might affect the cash flows, extension options or prepayment options, etc.
- Contractual terms that do not provide the Group with consideration for the time value of money and for credit risk: transactions in which the interest rate is periodically reset but the frequency of that reset does not match the tenor of the interest rate, returns linked to prices or performance of other assets, leverage, etc.
- Non-recourse instruments: financial assets whose contractual cash flows are described as principal and interest, but those cash flows do not represent the payment of principal and interest on the principal amount outstanding.
- Contractually linked instruments: situations in which an issuer may prioritise payments to the holders of financial assets using multiple contractually linked instruments that create concentrations of credit risk (tranches).
- The currency in which the financial asset is denominated.
- De minimis and non-genuine: variables that, while not passing the SPPI test, have an impact that is insignificant or immaterial (de minimis) or that affect contractual cash flows only on the occurrence of an event that is extremely rare, highly abnormal and very unlikely to occur (non-genuine). However, if a contractual cash flow characteristic could have an effect on the contractual cash flows that is more than de minimis or that cash flow characteristic is genuine, and introduces exposure to risks or volatility that is unrelated to a basic lending arrangement, it does not give rise to contractual cash flows that are solely payments of principal and interest on the principal amount outstanding.

Nevertheless, financial instruments that should be considered as non-current assets held for sale in accordance with IFRS 5 are recognised in the consolidated financial statements of the Bankia Group as explained in Note 2.20.

(2.2.5) Reclassification of financial instruments between portfolios

When, and only when, the Group changes its business model for managing financial assets, it reclassifies all affected debt instruments on the basis that a change in the business model is considered to be exceptional or infrequent.

The Group has defined the following business models:

- Hold assets in order to collect contractual cash flows, whose objective is to hold financial assets to maturity in order to collect the contractual cash flows. Some sales are permitted, if those sales are infrequent or insignificant in value or when, irrespective of their frequency and value, they are carried out due to an increase in the assets' credit risk.
- Hold assets in order to collect contractual cash flows and sell financial assets, whose objective is to hold financial assets to maturity, but also to sell them in order to collect the contractual cash flows arising from their sale. These financial assets are measured at fair value through other comprehensive income.
- Hold assets for sale, whose objective is to manage the financial assets in order to collect cash flows by selling them, which normally involves frequent purchases and sales of the assets. These financial assets are measured at fair value through profit or loss.

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The following diagram illustrates potential reclassifications of debt instruments among categories:

		Reclassification to:		
		Fair value through profit or loss	Fair value through other comprehensive income	Amortised Cost
Reclassification from:	Fair value through profit or loss		<ul style="list-style-type: none"> Fair value at the date of reclassification as gross carrying amount Recognition of subsequent changes in fair value in accumulated other comprehensive income 	<ul style="list-style-type: none"> Fair value at the date of reclassification as gross carrying amount
	Fair value through other comprehensive income	<ul style="list-style-type: none"> Fair value at the date of reclassification as gross carrying amount Reclassification of the amount accumulated in accumulated other comprehensive income to profit or loss at the date of reclassification 		<ul style="list-style-type: none"> Fair value at the date of reclassification as gross carrying amount, adjustment for the elimination of the amount accumulated in other comprehensive income (which coincides with amortised cost) No changes are made to the effective interest rate or expected credit losses
	Amortised cost	<ul style="list-style-type: none"> Fair value at the date of reclassification as gross carrying amount Recognition of the difference between amortised cost and fair value in profit or loss 	<ul style="list-style-type: none"> Fair value at the date of reclassification as gross carrying amount Recognition of the difference between amortised cost and fair value in accumulated other comprehensive income No changes are made to the effective interest rate or expected credit losses 	

There have been no changes in the Group's business model during the period, and therefore no reclassification of debt instruments.

Under no circumstances does the Group reclassify derivatives to a category other than fair value through profit or loss, nor does it reclassify any financial liabilities.

Reclassification to fair value through profit or loss is not permitted for equity instruments not held for trading and irrevocably designated on initial recognition as at fair value through other comprehensive income.

Similarly, the Group does not reclassify equity instruments measured at fair value through profit or loss to financial assets at fair value through other comprehensive income.

(2.3) Hedge accounting and mitigation of risk

The Group has elected to continue applying the recognition and measurement criteria for hedges included in IAS 39.

The Group uses financial derivatives as part of its strategy to reduce its exposure to interest rate, credit and currency risks, among other risks. When these transactions meet certain requirements stipulated in the applicable accounting regulations, they qualify for hedge accounting.

When the Group designates a transaction as a hedge, it does so from the inception of the hedge or hedged instruments, and the hedging transaction is duly documented. The hedge accounting documentation includes identification of the hedged item(s) and the hedging instrument(s), the nature of the risk to be hedged and the criteria or methods used by the Group to assess the effectiveness of the hedge over its entire life, taking into account the risk to be hedged.

The Group enters into hedges on a transaction-by-transaction basis in accordance with the criteria explained previously, continually monitoring the effectiveness of each hedge, to ensure that changes in the value of the hedging instrument and the hedged item offset each other.

To measure the effectiveness of hedges designated as such, the Group analyses whether, from inception to expiration of the hedge, it can expect, prospectively, that the changes in the fair value or cash flows of the hedged item that are attributable to the hedged risk will be almost fully offset by changes in the fair value or cash flows, as appropriate, of the hedging instrument or instruments and, retrospectively, whether the actual results of the hedge have been within a range of 80% to 125% of the results of the hedged item.

The Group discontinues hedge accounting when the hedging instrument expires or is sold, when the hedge no longer meets the requirements for hedge accounting or it revokes the designation as a hedge.

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The Group's hedging transactions are classified into the following categories:

- **Fair value hedges:** these hedge exposure to changes in the fair value of recognised financial assets and liabilities or unrecognised firm commitments, or a component of any such item, that is attributable to a specific risk and could affect the consolidated income statement.

The Group applies hedge accounting to reduce the risk that the fair value of fixed-rate assets and liabilities will fluctuate as if they were instruments indexed to a floating interest rate. The Group only hedges changes in the fair value of the hedged instrument attributed to changes in the reference rate, which constitutes the main element of the total fluctuation in the fair value of the hedged item.

The Group uses the hypothetical derivative method to assess effectiveness, by comparing changes in the fair value of the hedging instruments and hedged items attributable to the change in the reference rate. This method implies modelling a derivative instrument whose characteristics perfectly match those of the hedged risk, so that the change in the fair value of the hypothetical derivative should be equivalent to the change in the present value of the expected future cash flows of the hedged item. The measurement of hedge ineffectiveness is based on a comparison between the changes in the fair of the derivative actually arranged as a hedge and the changes in the fair value of the hypothetical derivative.

The Group also matches the principal of the hedging instruments with the principal of the hedged items.

The Group's main hedged positions and the financial hedging instruments used are as follows:

- Financial assets at fair value through other comprehensive income: fixed-rate debt securities, whose risk is hedged with interest rate derivatives (basically swaps).
- Financial assets at amortised cost: fixed-rate loans, whose risk is hedged with interest rate derivatives (basically swaps).
- Financial liabilities at amortised cost: long-term fixed-rate deposits and debt securities issued by the Group, whose risk is hedged with interest rate derivatives (basically swaps).

The main reason for the ineffectiveness of this type of hedge may arise from the divergence between payment dates of the hedging instruments and the hedged item, and the use of different interest rate curves to discount the hedging instruments and the hedged item.

Specifically, for financial instruments designated as hedged items and hedge accounting, the differences in value are recognised as follows:

- The gains or losses arising on both the hedging instruments and the hedged items associated with the hedged risk are recognised directly in the consolidated income statement. The balancing entry for changes in the fair value of the hedged item attributable to the hedged risk is recorded as an adjustment to the fair value of the hedged instruments.
- When fair value hedging is discontinued, in the case of hedged items at amortised cost, the value adjustments made as a result of the hedge accounting are recognised in the consolidated income statement until maturity of the hedged items, using the effective interest rate recalculated at the date the hedge accounting is discontinued.
- **Cash flow hedges:** these hedge exposure to variability in cash flows that is attributable to a specific risk associated with all or a component of a recognised asset or liability or a highly probable forecast transaction and could affect consolidated profit or loss.

The Group applies hedge accounting to reduce the risk that the cash flows of floating-rate assets and liabilities will fluctuate as if they were instruments indexed to a fixed interest rate.

The Group's main hedged positions and the financial hedging instruments used are as follows:

- Financial assets at fair value through other comprehensive income: floating-rate debt securities, whose risk is hedged with interest rate derivatives (basically swaps).
- Financial assets at amortised cost: floating-rate loans, whose risk is hedged with interest rate derivatives (basically swaps).

The Group uses the hypothetical derivative method to assess effectiveness, by comparing changes in the fair value of the hedging instruments and hedged items attributable to the change in the reference rate, as explained for fair value hedges. All cash flow hedges arranged by the Group are transactions in which the hedged transaction perfectly matches the hedging derivative. As a result, no significant causes of ineffectiveness for this type of hedge have arisen.

Specifically, for financial instruments designated as hedged items and hedge accounting, the differences in value are recognised as follows:

- The gains or losses attributable to the portion of the hedging instruments that qualifies as an effective hedge are recognised temporarily in consolidated equity under "Accumulated other comprehensive income - Items that may be reclassified to profit or loss - Hedging derivatives. Cash flow hedge reserve [effective portion]". Financial instruments hedged in this type of hedging transaction are recognised as explained in "Classification and measurement of financial assets and liabilities", with no change made to the recognition criteria due to their consideration as hedged items.

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- As a general rule, in cash flow hedges, the gains or losses attributable to the effective portion of the hedging instruments are not recognised in the consolidated income statement until the gains or losses on the hedged item are recognised in the consolidated income statement or, if the hedge relates to a highly probable forecast transaction that will lead to the recognition of a non-financial asset or liability, they are recognised as part of the acquisition or issue cost when the asset is acquired or the liability is assumed.
- The gains or losses on the ineffective portion of the hedging instruments are recognised directly under "Gains or (-) losses from hedge accounting, net" in the consolidated income statement.
- If a cash flow hedge is discontinued, the cumulative gain or loss on the hedging instrument recognised under "Equity - Accumulated other comprehensive income" on the consolidated balance sheet will continue to be recognised under that heading until the forecast hedged transaction occurs, whereupon it will be reclassified to the consolidated income statement or it will correct the acquisition cost of the asset or liability to be recorded, if the hedged item is a forecast transaction that results in the recognition of a non-financial asset or liability.
- **Hedges of net investment in a foreign operation:** these hedge the currency risk deriving from investments in subsidiaries, associates, joint ventures and branches of the Group whose activities are based or undertaken in a different country or in a currency other than the euro. The treatment for this type of hedge is the same as for cash flow hedges. The amounts recognised as valuation adjustments in consolidated equity in accordance with the aforementioned criteria are taken to the consolidated income statement when they are disposed of or derecognised.

(2.4) Foreign currency transactions

(2.4.1) Functional currency

The Group's functional currency is the euro. Consequently, all balances and transactions denominated in currencies other than the euro are considered to be denominated in "foreign currency".

Details of the equivalent euro value (in thousands of euros) of the main asset and liability balances on the consolidated balance sheet at 31 December 2020 and 2019, indicating the nature of the items and the main currencies in which they are denominated, are as follows:

(in thousands of euros)				
ITEM	31/12/2020		31/12/2019	
	Assets	Liabilities	Assets	Liabilities
Balances in US dollars				
Cash, cash balances at central banks and other demand deposits	50,910	-	160,994	-
Financial assets and financial liabilities held for trading	200,333	113,474	236,051	120,998
Financial assets at amortised cost	1,467,209	-	1,350,957	-
Financial liabilities at amortised cost	-	1,526,059	-	1,267,675
Financial assets at fair value through other comprehensive income	18,495	-	36,053	-
Other	515	17,370	36,695	19,486
Sum	1,737,462	1,656,903	1,820,750	1,408,159
Balances in pounds sterling				
Cash, cash balances at central banks and other demand deposits	7,411	-	6,050	-
Financial assets and financial liabilities held for trading	59,681	60,810	104,682	106,657
Financial assets at amortised cost	259,678	-	175,839	-
Financial liabilities at amortised cost	-	153,687	-	73,353
Other	-	20	-	4
Sum	326,770	214,517	286,571	180,014
Balances in other currencies				
Cash, cash balances at central banks and other demand deposits	24,490	-	20,662	-
Financial assets and financial liabilities held for trading	2,387	3,387	6,314	7,597
Financial assets at amortised cost	435,926	-	226,736	-
Financial liabilities at amortised cost	-	92,827	-	101,677
Other	5	3,200	8	1,786
Sum	462,808	99,414	253,720	111,060
Total foreign currency balances	2,527,040	1,970,834	2,361,041	1,699,233

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(2.4.2) Criteria for translation of foreign currency balances

Balances in foreign currencies are translated to euros in two consecutive phases:

- Translation of foreign currency to the functional currency of the Group entities, joint ventures and entities accounted for using the equity method, and
- Translation to euros of the balances of consolidated companies or companies accounted for using the equity method whose presentation currency is not the euro.

The functional currencies of all the Group entities or entities accounted for using the equity method in the consolidated financial statements are the same as their respective presentation currencies.

Translation of foreign currency to the functional currency: foreign currency transactions performed by consolidated entities or entities accounted for using the equity method are initially recognised in their respective financial statements at the equivalent value of their functional currencies, translated using the exchange rates prevailing at the transaction date. Subsequently, the consolidated entities translate the foreign currency monetary items to their functional currencies using the exchange rates at year end.

Furthermore:

- Non-monetary items measured at historical cost are translated to the functional currency at the exchange rate at the date of acquisition.
- Non-monetary items measured at fair value are translated to the functional currency at the exchange rate at the date when the fair value was determined.

Entities whose functional currency is not the euro: the balances in the financial statements of the consolidated entities and entities accounted for using the equity method whose functional currency is not the euro are translated to euros as follows:

- Assets and liabilities, at the closing rates.
- Income and expenses and cash flows, at the average exchange rates for the year.
- Equity, at the historical exchange rates.

(2.4.3) Exchange rates applied

The exchange rates used by the Group in translating the foreign currency balances to euros for the purpose of preparing the consolidated financial statements, taking into account the criteria mentioned above, were the official rates published by the European Central Bank.

(2.4.4) Recognition of exchange differences

Exchange differences arising from the translation of foreign currency balances into the functional currency of consolidated entities and their branch offices are generally recognised at their net amount under "Exchange differences [gain or (-) loss], net" in the consolidated income statement, except for exchange differences deriving from financial instruments at fair value through profit or loss, which are recognised in the consolidated income statement under "Gains or (-) losses on financial assets and liabilities held for trading, net", "Gains or (-) losses on non-trading financial assets mandatorily at fair value through profit or loss, net" or "Gains or (-) losses on financial assets and liabilities designated at fair value through profit or loss, net", without differentiating them from the rest of the changes in fair value.

However, exchange differences arising from non-monetary items whose fair value is adjusted through equity are recognised in consolidated equity under "Accumulated other comprehensive income - Items that may be reclassified to profit or loss - Foreign currency translation" on the consolidated balance sheet until they are realised.

The exchange differences arising on the translation to euros of the financial statements in the functional currencies of the consolidated entities, whose functional currency is not the euro, are recognised in consolidated equity under "Accumulated other comprehensive income - Items that may be reclassified to profit or loss - Foreign currency translation" on the consolidated balance sheet, whereas those translated to euros of the financial statements of entities accounted for using the equity method are recognised under "Accumulated other comprehensive income - Items that may be reclassified to profit or loss - Share of other recognised income and expense of investments in joint ventures and associates".

(2.5) Recognition of income and expenses

The most significant accounting criteria used by the Group to recognise its income and expenses are summarised as follows:

(2.5.1) Interest income and expenses, dividends and similar items

As a general rule, interest income, interest expenses and similar items are recognised on the basis of their period of accrual using the effective interest method defined in IFRS 9. Dividends received from companies other than those within the scope of consolidation of the Group are recognised as income when the consolidated entities' right to receive them arises.

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However, when a debt security is assessed to be impaired individually or because recovery is considered unlikely, except for purchased or originated credit-impaired financial assets, the interest accrued in the consolidated income statement is the result of applying the effective interest rate to the amortised cost (i.e. adjusted for any loss allowance), recognising an impairment loss for the same amount.

For purchased or originated credit-impaired financial assets, interest income is calculated by applying the credit-adjusted effective interest rate to the amortised cost of the financial asset.

(2.5.2) Commissions, fees and similar items

Fee and commission income and expenses that are not to be included in the calculation of the effective interest rate of transactions and/or are not included in the acquisition cost of financial assets or liabilities other than those classified as at fair value through profit or loss are recognised in the consolidated income statement using criteria that vary according to their nature. The most significant fee and commission items are as follows:

- Fees and commissions linked to the acquisition of financial assets and liabilities carried at fair value through profit or loss, which are recognised in the income statement at the settlement date.
- Those arising from transactions or services that are performed over a period of time, which are recognised in the consolidated income statement over the life of these transactions or services.
- Those relating to services provided in a single act, which are recognised in the income statement when the single act is carried out.

(2.5.3) Non-financial income and expenses

Non-financial income and expenses are recognised on an accrual basis.

(2.5.4) Deferred income and accrued expenses

These are recognised for accounting purposes at the present value of the estimated cash flows discounted at market rates.

(2.6) Offsetting

Asset and liability balances are offset, i.e. reported on the consolidated balance sheet at their net amount, when, and only when, they arise from transactions in which a contractual or legal right of set-off exists and the Group intends to settle them on a net basis, or to realise the asset and settle the liability simultaneously.

In this regard, the presentation of financial assets subject to valuation adjustments for depreciation or impairment, net of these adjustments, is not considered “offsetting”.

In addition, the Group offsets positions in trading derivatives arranged through clearing houses, when they meet the criteria for offsetting a financial asset and a financial liability, as follows:

- the entity has a legally enforceable right to set off the recognised amounts of the instruments; and
- the entity intends either to settle on a net basis, or to realise the asset and settle the liability simultaneously.

IAS 32 “Financial Instruments: presentation and disclosure” clarifies when a financial asset and financial liability are eligible for offset. The criteria were considered for the aforementioned offset. Specifically, regarding the first of the above requirements, the right of set-off cannot be contingent on a future event and must be legally enforceable in the following circumstances: the normal course of business, the event of default and the event of insolvency or bankruptcy of the entity and all the counterparties.

Regarding the second requirement, the settlement mechanism through clearing houses must have features that eliminate or result in insignificant credit and liquidity risk, inasmuch as they process receivables and payables in a single settlement process or cycle, such that the result is, effectively, equivalent to net settlement.

Notes 9 and 13 present details of net positions by class of derivative. However, in accordance with prevailing regulations, other disclosures regarding offset positions are presented at their gross amount.

(2.7) Transfers of financial assets

The accounting treatment of transfers of financial assets depends on the extent to which the risks and rewards associated with the transferred assets are transferred to third parties:

- If substantially all the risks and rewards of the transferred assets are transferred to third parties – i.e. an unconditional sale of financial assets, a sale of financial assets under an agreement to repurchase them at their fair value at the date of repurchase, a sale of financial assets together with a purchased call option or a written put option that is deeply out of the money, securitisation of assets in which the transferor does not retain a subordinated debt or grant any credit enhancement to the new holders, and other similar cases – the transferred financial asset is derecognised and any rights or obligations retained or created in the transfer are recognised simultaneously.

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- If substantially all the risks and rewards associated with the transferred financial asset are retained – i.e. a sale of financial assets under an agreement to repurchase them at a fixed price or at the sale price plus interest, a securities lending agreement in which the borrower undertakes to return the same or similar assets, securitisation of financial assets in which a subordinated debt or another type of credit enhancement that absorbs substantially all the expected credit losses on the securitised assets is retained, and other similar cases – the transferred financial asset is not derecognised and continues to be measured applying the same criteria as those used prior to the transfer. However, the following items are recognised with no offsetting:
 - An associated financial liability, for an amount equal to the consideration received; this liability is subsequently measured at amortised cost, or, if the aforementioned requirements for classification as other financial liabilities at fair value through profit or loss are met, at fair value, in accordance with the aforementioned criteria for this type of financial liability.
 - The income from the financial asset transferred but not derecognised and any expense incurred on the new financial liability.
- If the Group neither transfers nor retains substantially all the risks and rewards associated with the financial asset transferred – i.e. a sale of financial assets with a purchased call option or a written put option that is neither deeply in the money nor deeply out of the money, securitisation of financial assets in which the transferor retains a subordinated debt or other type of credit enhancement for a portion of the transferred asset, and other similar cases – the following distinction is made:
 - If the transferor does not retain control of the transferred financial asset, the transferred financial asset is derecognised and any right or obligation retained or created as a result of the transfer is recognised.
 - If the transferor retains control of the transferred financial asset, it continues to recognise it on the consolidated balance sheet for an amount equal to its exposure to changes in value and recognises a financial liability associated with the transferred financial asset. The net amount of the transferred asset and associated liability is the amortised cost of the rights and obligations retained, if the transferred asset is measured at amortised cost, or the fair value of the rights and obligations retained, if the transferred asset is measured at fair value.

Accordingly, financial assets are only derecognised when the cash flows they generate have been extinguished or when substantially all the inherent risks and rewards have been transferred to third parties.

Note 27.1 contains a summary of the main circumstances of the principal transfers of assets outstanding at the 2020 and 2019 year ends.

(2.8) Exchanges of assets

Exchanges of assets entail the acquisition of tangible or intangible assets in exchange for other non-monetary assets or a combination of monetary and non-monetary assets. For the purposes of these consolidated financial statements, the foreclosure of assets to recover amounts owed to consolidated entities by third parties is not considered an exchange of assets.

The assets received in an exchange of assets are recognised at fair value, provided that the transaction can be deemed to have commercial substance, as defined in IAS 16 and 38, and that the fair value of the asset received or, failing this, of the asset given up, can be estimated reliably. The fair value of the instrument received is determined as the fair value of the asset given up plus, where applicable, the fair value of any monetary consideration given up in exchange, unless the fair value of the asset received is more clearly evident.

If the exchanges of assets do not meet the above requirements, the asset received is recognised at the carrying amount of the asset given up plus the monetary consideration given up or assumed in the acquisition.

(2.9) Impairment of financial assets

The impairment model is applicable to debt instruments at amortised cost, debt instruments measured at fair value through other comprehensive income, and other exposures that give rise to credit risk, such as loan commitments given, financial guarantees given, and other commitments given.

The criteria for assessing and classifying transactions in the consolidated financial statements in accordance with their credit risk includes both the credit risk attributable to insolvency and any country risk to which the transactions are exposed. Credit transactions that are exposed to both credit risk attributable to insolvency and country risk are classified in the category attributable to insolvency risk. However, impairment losses attributable to insolvency are estimated on a country risk basis when the latter requirements are more stringent.

Impairment losses for the period are recognised as an expense in the consolidated income statement, with a balancing entry in the carrying amount of the asset. Reversals of previously recognised impairment losses are recognised as income in the consolidated income statement. For debt instruments measured at fair value through other comprehensive income, the instrument is subsequently adjusted to fair value, with a balancing entry in “Accumulated other comprehensive income” in consolidated equity.

A) Classification of transactions on the basis of credit risk attributable to insolvency

Financial instruments – including off-balance sheet exposures – are classified into the following categories considering whether there has been a significant increase in credit risk since initial recognition of the transaction or a default event has occurred:

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

- Stage 1 – Performing exposures: the risk of a default event has not increased significantly since initial recognition of the transaction. The amount of the loss allowance for this type of instrument is equal to 12-month expected credit losses.
- Stage 2 – Performing exposures under special monitoring: the risk of a default event has increased significantly since initial recognition of the transaction. The amount of the loss allowance for this type of instrument is equal to lifetime expected credit losses.
- Stage 3 – Non-performing exposures: a default event in the transaction has occurred. The amount of the loss allowance for this type of instrument is equal to lifetime expected credit losses.
- Total write-off: transactions in which the Group has no reasonable expectations of recovery. The amount of the loss allowance for this type of instrument is equal to its carrying amount and entails the full or partial write-off of the asset.

The Group uses the following definitions for the purposes of classifying a financial instrument into one of the preceding categories:

Significant increase in credit risk

For financial instruments classified in Stage 1 – Performing exposures, the Group assesses whether to continue recognising 12-month expected credit losses. The Group assesses whether there has been a significant increase in credit risk since initial recognition. If so, it transfers the financial instrument to Stage 2 – Performing exposures under special monitoring and recognises lifetime expected credit losses. This assessment is performed from a dual perspective – quantitative and qualitative – and it is symmetrical, such that the financial instrument may return to Stage 1 – Performing exposures.

To perform this assessment from a quantitative perspective, the Group has developed a specific approach for comparing probability of default (PD), whereby current PD is compared to the original PD associated with the rating level at inception. If the assessment shows an increase above absolute and relative thresholds, the Group considers that there has been a significant increase in the credit risk of the instrument. These thresholds were calibrated in accordance with the criteria set out in the Group's risk approval policy and consider the individual characteristics of the loan portfolios. The election of the thresholds for classification of transactions into Stage 2 – Performing exposures under special monitoring was based on analysis of the Group's historical experience, in which transactions with similar PD levels were classified in Stage 2 – Performing exposures under special monitoring using quantitative and qualitative criteria.

For the purposes of the quantitative comparison, the Group availed of the simplification allowed in the standard, which considers changes in the risk of a default occurring over the next 12 months as a reasonable approximation to changes in lifetime risk of default of the instrument. This approach is aligned with the Group's credit risk management practices and provides a reasonable approximation to the changes in the lifetime risk of a default occurring. In this respect, no situations have been identified where the financial instrument presents significant payment obligations beyond the next 12 months, where changes in relevant macroeconomic or other credit-related factors occur that are not adequately reflected in the risk of a default occurring in the next 12 months, or where changes in credit-related factors only have an impact on the credit risk of the financial instrument beyond 12 months indicating that a lifetime assessment is necessary.

Moreover, for comparison and considering the ageing of current transactions, for those in which no PD was available on origination, the Group has used the first PD available.

The Group's credit risk management systems also include other quantitative and qualitative components which, combined or separately, could give rise to the consideration that the credit risk of the financial instrument has increased significantly, such as adverse changes in the borrower's financial position, downgrades in credit rating, unfavourable changes in the sector in which they operate or in their regulatory or technological environment, among others, which do not present evidence of impairment. These factors and weightings vary by type of product, type of borrower, and characteristics of the financial instrument, so it is not possible to detail a single set of criteria for determining the occurrence of a significant increase in credit risk.

Irrespective of the assessment based on probability of default and indications of deterioration in the credit risk of the exposure, a significant increase in credit risk is determined in transactions presenting the following circumstances:

- More than 30 days past due, rebuttable presumption based on reasonable and supportable information. The Group has not applied a longer period of time for these purposes.
- Refinancing or restructuring that does not present evidence of impairment. Appendix X shows the classification and allowance policies and criteria applied by the Group for these types of transactions.
- Special debt sustainability agreement that does not present evidence of impairment until the cure criterion is applied.
- Agreements with issuers or borrowers declared subject to bankruptcy proceedings that do not present evidence of impairment.
- Repeat default or addition to the default ladder that does not present evidence of impairment of mortgage loans extended to individuals.

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However, for assets with a counterparty of low credit risk, the Group applies the possibility included in the standard of considering that their credit risk has not increased significantly. Such counterparties are primarily central banks, general government, deposit guarantee and resolution funds, credit institutions, reciprocal guarantee companies, and non-financial corporations considered to belong to the public sector.

As regards the measures granted by the Bankia Group to support families and businesses during the COVID-19 pandemic, these measures do not in themselves give rise to an improvement over the previous classification of the loan on the basis of credit risk attributable to insolvency. In addition, the Group analyses those situations in which the beneficiary of a support measure is dealing with one-off liquidity pressures caused by the outbreak or, on the contrary, the debtor's ability to pay may be jeopardised in the long term. In this regard:

- At the outset of the situation caused by the COVID-19 pandemic and when the transactions are modified, the Group assesses whether there has been a significant increase in credit risk in such transaction. In the absence of such an increase, the Group does not lower the credit rating assigned to the transaction.
- The granting of guarantees by the State does not increase or reduce the risk of default by the borrower and, therefore, does not affect the assessment as to whether there has been a significant increase in credit risk since initial recognition. At the outset of the situation caused by the COVID-19 pandemic and when the State-backed financing is extended, the Group assesses whether there has been a significant increase in credit risk in the pre-existing transactions arranged with the borrower. In the absence of this increase, the Group does not lower the credit rating assigned to the transaction.

After being granted, public and sector-specific moratoriums entail the calculation of days of default based on the new payment schedule resulting from application thereof. Amounts suspended by public moratoriums are not considered as due and payable or, therefore, as past-due during the moratorium.

Default and credit-impaired financial assets

To determine the risk of default, the Group applies a definition that is consistent with the one used for internal credit risk management of financial instruments and considers quantitative and qualitative indicators.

In this respect, the Group considers that default occurs in credit exposures in the following circumstances:

- More than 90 days past due. This includes all of a borrower's transactions when the amount of balances more than 90 days past due exceeds 20% of the amount outstanding.
- There are reasonable doubts that the full amount of the asset will be repaid.

A financial instrument is considered credit-impaired when one or more events that have a detrimental impact on its estimated future cash flows have occurred. Evidence that a financial asset is credit-impaired includes observable data about the following events:

- Significant financial difficulty of the issuer or the borrower.
- Breach of contract, such as a default or past-due event.
- The lender, for economic or contractual reasons relating to the borrower's financial difficulty, having granted to the borrower a concession(s) that the lender would not otherwise consider. Appendix X shows the classification and allowance policies and criteria applied by the Group for these types of transactions.
- It is becoming probable that the borrower will enter bankruptcy or other financial reorganisation.
- The disappearance of an active market for that financial instrument because of the issuer's financial difficulties.
- The purchase or origination of a financial asset at a deep discount that reflects the incurred credit losses.

It may be possible to identify a single discrete event or, instead, the combined effect of several events may have caused financial assets to become credit-impaired.

In any case, the Group's definitions of default and credit-impaired asset are aligned.

In relation to the support measures granted to families and households to mitigate the effects of the COVID-19 pandemic, the following considerations should be noted:

- As regards non-payment of more than 90 days, the granting of the moratorium entails the calculation of days of default based on the new payment schedule resulting from application thereof. Accordingly, the amounts suspended by the public moratoriums are not considered due and payable and, therefore, are not overdue for the purpose of increasing the calculation of days of default for such balances. As such, they do not generate new classifications to Stage 3 - Non-performing exposures during the moratorium as a result of default exceeding 90 days.

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- With respect to the existence of reasonable doubts as to the full repayment of the loan, in those cases where relief measures (moratoriums and guarantee lines) have been granted, the Group continues to apply the general criteria contained in the monitoring policies to assess the borrower's ability to pay. This analysis aims to identify those situations in which it is highly likely that temporary problems will turn into longer-term difficulties, ultimately leading to the borrowers' inability to meet their contractual obligations.

No reasonable expectations of recovery

The Group classifies a transaction as a total write-off when, after an individualised assessment, it has no reasonable expectations of recovering the contractual cash flows due to manifest and irreversible deterioration of the solvency of the transaction or borrower.

In this respect, the Group deems the recovery of the following transactions to be remote (automatic classification factors):

- Transactions classified as Stage 3 – Non-performing due to arrears that have been in this category for more than four years or that, before reaching this age, have been covered by a credit risk allowance or provision of 100% for over two years, unless there is effective collateral, on the basis of the present value, covering at least 10% of the gross carrying amount of the transaction.
- Transactions with borrowers declared to be in bankruptcy proceedings for which there is evidence that the liquidation phase has been or is due to be declared, except those with effective collateral, on the basis of the present value, covering at least 10% of the gross carrying amount of the transaction.

Classification in this category for the above reasons does not, however, mean that the Group should cease negotiations and legal action to recover the amount.

The Group also assesses the individual facts and circumstances that could indicate that recovery of the contractual cash flows of the transaction is remote. These include situations where recovery proceedings have been exhausted although the age of default is less than four years; exposures in bankruptcy proceedings for which the expectation of recovery is low; or situations where high costs must be incurred that do not justify the amount to be recovered.

B) Methodologies for estimating expected credit losses due to insolvency

The estimation of expected credit losses considers the following aspects, among others:

- The existence of several possible outcomes, for which different weightings are determined based on the probability of occurrence of the various scenarios.
- The time value of money.
- The latest available information without undue cost or effort, reflecting past events, current conditions and forecasts of future economic conditions.

In estimating the expected credit losses on debt instruments, the Group takes into consideration all the characteristics of the transaction, including the cash flows that would be obtained from enforcing the government's guarantees. Therefore, the expected credit loss is decreased by the positive impact of the cash flows expected to be recovered from the guarantor, irrespective of the classification of the transaction's credit risk attributable to insolvency.

The process for estimating expected credit losses is carried out on an individual or collective basis.

B.1) Individual estimation of allowances and provisions

The Group takes into consideration the following characteristics to identify borrowers which, due to their credit exposure and level of risk, require individual assessment:

- Individual assessment to determine the accounting classification: in this case, all borrowers exceeding the EUR 5 million EAD threshold, excluding those identified as having low credit risk, except for those classified as Stage 3 – Non-performing exposures.
- Individual estimation of allowances and provisions: in this case for:
 - All borrowers that exceed the aforementioned threshold and are classified as Stage 3 - Non-performing exposures, as well as those below the threshold classified as Stage 3 - Non-performing exposures and determined using experienced judgement, including borrowers classified as Stage 3 – Non-performing exposures for reasons other than arrears, or as Stage 2 – Performing exposures under special monitoring, except those classified on the basis of automatic classification factors.
 - Also subject to individual estimation are borrowers with transactions identified as having low risk classified as Stage 3 – Non-performing exposures although they are below the materiality threshold.

The Group's approach for estimating expected credit losses of debt instruments takes the negative difference between the present value of estimated future cash flows discounted at the effective interest rate and the respective amounts of credit exposure.

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- Forecast future cash flows: considering all the amounts the Group expects to obtain over the instrument's remaining life. In this regard, it considers both going concern and gone concern approaches; i.e. settlement and enforcement of collateral.
- Credit exposure: carrying amount of transactions at the calculation date and off-balance sheet amounts expected to be disbursed in the future. To estimate the amounts of off-balance-sheet exposures expected to be disbursed bearing credit risk, a Credit Conversion Factor (CCF) is applied to the nominal amount of the transaction.

The assessment of the effectiveness of guarantees and collateral considers, among others, the time required to enforce, and the ability to dispose of, the collateral. Collateral or guarantees whose effectiveness depends substantially upon the credit quality of the debtor, or of any economic group to which the debtor may belong, are not eligible. The Group has policies and procedures on the evaluation of collateral in accordance with applicable regulations.

Allowances for large borrowers for which no significant increase in credit risk or evidence of impairment has been determined and which have therefore been classified in Stage 1 - Performing exposures, are estimated collectively. The Group also collectively estimates expected credit losses on transactions assessed individually and classified in Stage 2 – Standard exposure under special monitoring solely on the basis of automatic classification factors or where no other factor has had a significant influence.

B.2) Collective estimation of credit losses

The estimation of expected credit losses for all credit exposures not assessed individually is made collectively.

The calculation of collective allowances of significant portfolios for which sufficient information is available is made using internal models. For portfolios with insufficient depth of available information, approaches are used that include experience and information on the Spanish banking sector and forecasts of future conditions. Allowances for exposures with low credit risk not classified in Stage 3 – Non- performing exposures are calculated using this approach, since there are not enough observations to develop internal models.

In accordance with applicable regulations and following the required approval by the Board of Directors and the corresponding internal validation process, on 1 January 2018 the Group implemented the use of internal methodologies to carry out the collective estimation of credit loss allowances. In line with the Group's internal models for estimating capital requirements, this internal methodology includes the calculation of losses, based on internal data, through own estimates of credit risk parameters.

The Group has established backtesting methodologies between estimated and actual losses. As a result of this testing, the Bank makes modifications to internal methodologies when periodic backtesting shows significant differences between estimated and actual losses.

When calculating expected losses on a collective basis using internal methods, the Group considers the following:

a) Criteria for grouping transactions

The Group distributes financial assets with credit risk in homogeneous groups based on the similar risk characteristics of the instruments included in the group. The criteria considered for this segmentation are representative of the patterns of estimated losses of each group.

Factors used by the Group for grouping transactions include the type of borrower or issuer (retail, self-employed, business, etc.), the classification of the borrower or issuer, the type of transaction (mortgage, consumer, card, etc.), the type of guarantee (personal, collateral, etc.). For certain portfolios, specific factors are applied, such as LTV ratios, the borrower's or issuer's turnover and sector for non-retail portfolios and the amount of time classified in Stage 3 – Non- performing exposures.

b) Risk parameters

The aggregate amount of expected credit losses is determined using the following parameters:

- The exposure at default (EAD): the Group's risk exposure at the time of default.
- Probability of default (PD): the probability of a default occurring.
- Loss given default (LGD): the percentage of exposure at risk that is not expected to be recovered in the event of default.

c) Scenarios and use of forecasts of future economic conditions

Expected credit losses recognised in the consolidated financial statements are the result of a series of probability-weighted scenarios.

In estimating impairment losses due to credit risk, all reasonable and well-founded information available must be considered, including that of a forward-looking nature. This means that past events and current conditions, as well as forecasts about future economic conditions, must be taken into consideration. To make the estimate, the Group takes the most likely scenario (baseline scenario) as the starting point. This baseline scenario is consistent with the scenario used for the purposes of the Group's internal planning processes.

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On the basis of the baseline scenario, a number of assumptions are made about the trends in the macroeconomic variables, such that two additional scenarios are obtained (one more favourable and the other more adverse), thus defining three scenarios at Group level.

The key macroeconomic variables vary across portfolios. However, the Group considers the most important macroeconomic variables to be the unemployment rate and gross domestic product ("GDP").

At 31 December 2020, the estimate of the macroeconomic variables applied was revised with respect to those applied at 31 December 2019, as a result of the changes in the macroeconomic scenarios arising from the COVID-19 pandemic.

As a result of the change in economic conditions generated by the COVID-19 pandemic, the weighting of the three scenarios with respect to employees at 31 December 2019, wherein the favourable and adverse scenarios were weighted at 20% and the baseline scenario at 60%, was revised at 31 December 2020. In this new situation, the favourable scenario is temporarily weighted at 15% and the adverse scenario remains at 20%, given the possibility that the economic consequences will be long term and the measures to sustain economic activity in households and companies could hypothetically be insufficient, with the baseline scenario being weighted at 65%.

To generate the reference macroeconomic variables, the scenarios published by Bankia Research in September 2020 were used. These macroeconomic forecasts consider a significant contraction in GDP in the short term and a progressive recovery in the following years to return to pre-COVID-19 levels.

The following table shows the expected changes in unemployment rate and GDP over the next three years, taking into account the aforementioned weighting considered by the Group at 31 December 2020:

	%			
	2020	2021	2022	2023
Unemployment rate	16.0	17.1	15.7	14.4
GDP (variation)	(13.0)	5.0	8.0	3.7

In addition, in applying the impact of the forward-looking scenarios on the expected loss, the Group has considered the aforementioned mitigating measures in terms of public and sector-specific support. However, since it is difficult to consider both effects in the current context, while the current situation persists, and following the guidelines of the various regulators and supervisors to make use of the flexibility contained in the accounting standard, the Group has given greater weight to the more stable projections, based on its historical experience and long-term projections with respect to the short-term variables, on estimating the impairment losses due to credit risk.

Considering the mitigating measures, the Group has therefore reflected more stable conditions in its forward-looking scenarios, in which the effects of the immediate fluctuations generated in an environment subject to continuous change in the very short term are mitigated. Once the situation begins to stabilise and reasonable and well-founded information is available, the Group will be able to make more reliable forecasts that will be reflected in the macroeconomic scenarios and the associated probabilities.

Lastly, the Group has carried out an additional exercise to assess exposures granted to borrowers that have been significantly affected by the pandemic. This exercise was carried out on the basis of segmentation by sectors and risks so as to identify the most vulnerable borrower groups, evaluating the outlook for each sector and using this information in the borrower credit ratings, with a view to identifying those exposures for which the risk has increased significantly since initial recognition, for the purpose of classifying them, primarily, as Stage 2 – Performing exposures under special monitoring (see Notes 12.2 and 12.3).

As a result of the aforementioned exercises, which involve estimating impairment losses due to credit risk generated by the rise in expected loss as a result of the economic downturn caused by the COVID-19 pandemic, taking into consideration the aforementioned relief and recovery measures, as well as the recommendations from the regulatory and prudential authorities, not to mention the existing uncertainty with regard to when recovery will take place considering the exceptional circumstances of 2020, in comparison with the historical data used to estimate expected losses, during 2020 additional allowances of financial assets EUR 490 million and EUR 15 million have been recognised to Investment property for impairment losses as a result of COVID-19.

C) Credit risk attributable to country risk

Country risk is understood as the risk associated with counterparties resident in a specific country due to circumstances other than normal commercial risk (sovereign risk, transfer risk or risks arising from international financial activity) or risk attributable to insolvency. The Group classifies third-party transactions into groups based on their economic performance, political situation, regulatory and institutional framework, and payment capacity and record, allocating to each the percentages of allowances stipulated in prevailing regulations.

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Non-performing assets due to country risk are deemed to be those transactions with ultimate obligors resident in countries that have had long-standing difficulties in servicing their debt, the possibility of recovering such debt being considered as doubtful; and off-balance sheet exposures, recovery of which is considered a remote possibility due to circumstances attributable to the country.

The Group does not have any significant exposures to credit risk attributable to country risk, so the level of provisions in this connection is not significant relative to total impairment allowances set aside by the Group.

(2.10) Financial guarantees and provisions for financial guarantees

“Financial guarantees” are defined as contracts whereby an entity undertakes to make specific payments on behalf of a third party if the latter fails to do so, irrespective of the various legal forms they may take: deposits, financial guarantees, irrevocable documentary credits issued or confirmed by the entity, etc.

In accordance with IFRS-EU, the Group generally treats financial guarantees provided to third parties as financial instruments within the scope of IFRS 9.

To determine whether a derivative sold is recognised as a financial guarantee or a trading derivative, a financial instrument is considered a derivative financial instrument when it meets the following conditions:

- Its value changes in response to the changes in a variable, sometimes called the "underlying", such as an interest rate, financial instrument and commodity price, foreign exchange rate, a credit rating or credit index, where this involves non-financial variables that are not specific to one of the parties to the contract.
- It requires no initial investment or one that is much smaller than would be required for other financial instruments that would be expected to have a similar response to changes in market factors.
- It is settled at a future date, except where it relates to a regular way purchase or sale of financial assets, defined as one in which the parties' reciprocal obligations must be discharged within a time frame established by regulation or convention in the market place and that may not be settled net.

Financial guarantees are contracts that require the Group, when it acts as issuer in the ordinary course of its business, to make specified payments to reimburse a creditor for a loss it incurs, because a specified debtor fails to make payment where due in accordance with the original or modified terms of a debt instrument, irrespective of its legal form, which may include, among others, a guarantee, a financial surety, an insurance contract or a credit derivative.

Specifically, guarantee contracts related to credit risk where execution of the guarantee does not require, as a necessary condition for payment, that the creditor is exposed to and has incurred a loss due to a debtor's failure to pay as required under the terms of the financial asset guaranteed, as well as in contracts where execution of the guarantee depends on changes in a specific credit rating or credit index, are considered derivative financial instruments.

The Group initially recognises the financial guarantees provided under liabilities on the consolidated balance sheet at fair value, plus the directly attributable transaction costs, which is generally the amount of the premium received plus, where applicable, the present value of the fees, commissions and interest receivable from these contracts over the term thereof, and it simultaneously recognises, under assets, the amount of the fees, commissions and similar amounts received at the start of the transactions and the amounts receivable at the present value of the fees, commissions and interest receivable. Subsequently, these contracts are recognised under liabilities on the consolidated balance sheet at the higher of the following two amounts:

- The amount determined in accordance with IFRS 9, taking into account the provisions of Annex IX of Bank of Spain Circular 4/2017 in this estimate. In this regard, financial guarantees, regardless of the guarantor, instrumentation or other circumstances, are reviewed periodically so as to determine the credit risk to which they are exposed and, if appropriate, to consider whether a provision is required. The credit risk is determined by application of criteria similar to those established for quantifying impairment losses on debt instruments carried at amortised cost, which are described in Note 2.9 above.
- The amount initially recognised for these instruments, less the related amortisation which, in accordance with IFRS 15, is charged to the consolidated income statement on a straight-line basis over the contract term.

The provisions made, if applicable, for these instruments are recognised under “Provisions - Commitments and guarantees given” under liabilities on the consolidated balance sheet. These provisions are recognised and reversed with a charge or credit, respectively, to “Provisions or (-) reversal of provisions” in the consolidated income statement.

If, in accordance with the foregoing, a provision is required for these financial guarantees, the unearned commissions on these transactions, which are recognised under “Financial liabilities at amortised cost – Other financial liabilities” under liabilities on the consolidated balance sheet, are reclassified to the appropriate provision.

(2.11) Leases

In lease accounting, different treatments apply when the Group acts as a lessee or as a lessor:

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

A) The Group as lessee

At the inception of a contract, the Group assesses whether the contract is, or contains, a lease. For all contracts which, after this assessment, are considered to be, or contain, a lease, the Group recognises an asset on the consolidated balance sheet, which represents the right to control the use of the identified asset for a period of time. At the same time, the Group recognises a lease liability, which represents the Group's obligation to make lease payments for the use of the underlying asset that are not paid at that date.

There are exemptions for short-term leases (leases with a lease term of 12 months or less) or leases in which the underlying asset is of low value. For these two types of leases, the Group recognises the lease payments as an expense on a straight-line basis over the lease term under "Administrative expenses - Other administrative expenses" in the consolidated income statement.

At the commencement date of the lease, the Group recognises the lease liability of the underlying asset at the present value of the lease payments that are not paid at that date, discounted using the interest rate implicit in the lease, if that rate can be readily determined. If that rate cannot be readily determined, the Group uses its incremental borrowing rate. The lease liability is recognised in "Financial liabilities at amortised cost - Other financial liabilities" on the consolidated balance sheet. The finance cost related to the lease liability is recognised under "Interest expenses" in the consolidated income statement. After the commencement date, the Group measures the lease liability by increasing the carrying amount to reflect interest, calculated using the effective interest rate method, and reducing the carrying amount to reflect the lease payments made.

The right-of-use asset is presented at the commencement date under "Tangible assets - Property, plant and equipment" and "Tangible assets - Investment property" on the consolidated balance sheet measured at the amount of the lease liability less any lease payments made at or before the commencement date, any initial direct costs incurred or the cost to be incurred in dismantling and removing the underlying asset or restoring it to the condition required by the terms and conditions of the lease.

Subsequently, the right-of-use asset is adjusted for the following:

- The asset's depreciation. The right-of-use asset is depreciated over the shorter of the useful life of the underlying asset and the lease term. Annual depreciation charges are recognised with the balancing entry in "Depreciation" in the consolidated income statement.
- Any impairment losses are recognised in "Impairment or (-) reversal of impairment on non-financial assets" in the consolidated income statement.
- Reflecting any new measurement of the lease liability.

The criteria for depreciation, the estimation of the assets' useful lives and the recognition of potential impairment losses are consistent with those described for property, plant and equipment for own use in Note 2.15.1 to the accompanying consolidated financial statements.

Variable lease payments that do not depend on an index or a rate are not included in the measurement of the lease obligation or the related right-of-use asset. These payments are recorded as an expense in the period under "Administrative expenses - Other administrative expenses" in the consolidated income statement.

Sale and leaseback transactions

In transactions in which the Group sells an asset it owns to a third party and leases that asset back, Group assesses whether the terms of the contract meet the requirements for the disposal to be considered the sale of the underlying asset; i.e. control of the asset is transferred to the buyer.

- If the transfer is a sale, the Group derecognises the asset and recognises the right-of-use asset arising on the sale and leaseback at the proportion of the carrying amount that relates to the right-of-use retained by the Group. It also recognises a lease liability. Therefore, the Group only recognises the amount of the gain or loss that relates to the rights transferred to the buyer-lessor.
- If the transfer does not satisfy the requirements to be accounted for as a sale, the Group continues to recognise the transferred asset and recognises a financial liability equal to the consideration received.

B) The Group as lessor:

Lease contracts in which the Group acts as lessor are classified as finance or operating leases. If the analysis of the contractual terms and conditions determines that the lease transfers substantially all the risks and rewards incidental to ownership of the assets, the contract is classified as a finance lease. All other leases are classified as operating leases.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Finance leases

The factors considered by the Group to determine whether a lease agreement is a finance lease and therefore transfers substantially all the risks and rewards incidental to ownership of the asset include:

- Whether the lease term covers the majority of the useful life of the asset.
- Whether the price of exercising the purchase option is lower than the fair value of the residual value of the asset at the end of the lease term.
- Whether the present value of the minimum lease payments amounts to substantially all the fair value of the leased asset.
- Whether use of the asset is restricted to the lessee.

When the Group acts as lessor of an asset in a finance lease, the sum of the present values of the lease payments receivable from the lessee plus the guaranteed residual value, which is generally the exercise price of the lessee's purchase option at the end of the lease term, is recognised as lending to third parties and is therefore included under "Financial assets at amortised cost" on the consolidated balance sheet based on the type of lessee.

When the Group acts as lessee in a finance lease, it recognises the cost of the leased assets on the consolidated balance sheet according to the nature of the leased asset, and, simultaneously, a liability for the same amount (at the lower of the fair value of the leased asset and the sum of the present values of the amounts payable to the lessor plus, where applicable, the exercise price of the purchase option). The depreciation policy for these assets is consistent with that for the Group's property, plant and equipment for own use (see Note 2.15.1). In both cases, the finance income and finance costs arising under these agreements are credited and debited, respectively, to "Interest income" and "Interest expenses", respectively, in the consolidated income statement and the accrued interest is estimated using the effective interest method as defined in IFRS 9.

Operating leases

In operating leases, ownership of the leased asset and substantially all the risks and rewards relating to the leased asset are retained by the lessor. When the Group acts as lessor in operating leases, it presents the acquisition cost of the leased assets under "Tangible assets" as "Investment property" or as "Property, plant and equipment - Leased out under an operating lease", depending on the type of assets leased. The depreciation policy for these assets is consistent with that for similar items of property, plant and equipment for own use, and income from operating leases is recognised on a straight-line basis under "Other operating income" in the consolidated income statement.

(2.12) Investment funds, pension funds, assets under management and savings insurance policies marketed and managed by the Group

Assets managed by consolidated companies and owned by third parties are not shown on the consolidated balance sheet. Fees and commissions generated on this activity are included under "Fee and commission income" in the consolidated income statement. Note 27.3 provides information on third-party assets managed by the Group at 31 December 2020 and 2019.

The investment funds and pension funds managed and savings insurance policies marketed and managed by the Group are not recognised on the Group's consolidated balance sheet because the related assets are owned by third parties (see Note 27.3). The fees and commissions earned in the year for the services rendered by Group companies to these funds (e.g. asset management and custody services) are recognised under "Fee and commission income" in the consolidated income statement (see Note 33).

(2.13) Staff expenses

(2.13.1) Post-employment benefits

(2.13.1.1) Types of commitments

Post-employment benefits are forms of compensation payable after completion of employment. The Group has undertaken to pay post-employment benefits to certain employees and to their beneficiary right holders.

Under current law, post-employment obligations are classified as defined contribution or defined benefit obligations, depending on the terms of the commitments assumed in each specific case. The Group's post-employment obligations to its employees are deemed to be defined contribution plan obligations wherever the Group makes predetermined contributions to a separate entity and will have no legal or effective obligation to pay further contributions if the separate entity cannot pay the employee benefits relating to the service rendered in the current and prior periods. Post-employment obligations that do not meet the aforementioned conditions are considered as defined benefit obligations.

All pension obligations to current and former employees of the Group are funded by pension plans and insurance policies.

All pension obligations to current and former employees of the Group are funded by plans in Spain.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(2.13.1.2) Description of the post-employment obligations undertaken by the Group

The post-employment obligations assumed by the Group with employees and their characteristics are as follows:

- Pensions of current employees:

A system is in place whereby individual, annual contributions are made based on a percentage of certain remuneration items, always observing the minimums set out in the Collective Bargaining Agreement.

At 31 December 2020, there were no individuals with defined benefit obligations for retirement.

- Pensions of retired employees:

On 15 July 2020 a labour agreement was entered into with most of the representatives of the Bank's employees. Among other measures, this agreement provides for unification of the system for reviewing defined benefit pension obligations, where these are subject to review, and stipulates constant future growth at a fixed annual rate of 0.35% effective as of 1 January 2021.

Virtually all the commitments for pensions of retired employees assumed by the Group are externalised through the pension plan and insurance policies.

In addition to these obligations, Note 6 describes the obligations with members of the Board of Directors of Bankia, S.A. and with Bankia's senior executives.

(2.13.1.3) Actuarial assumptions applied in the calculation of post-employment benefits

As a rule, the Group uses the following criteria to determine its obligations and commitments, and to cover such commitments:

- the projected unit credit method (which treats each year of service as giving rise to an additional unit of benefit entitlement and measures each unit separately); and
- actuarial assumptions, which when determined:
 - are not biased, and neither reckless nor excessively conservative,
 - are mutually compatible and adequately reflect the economic relations existing between factors such as inflation, expected salary increases, discount rates and expected return on plan assets, future levels of salaries and benefits based on market expectations at the date of the consolidated financial statements for the period in which the obligations are to be settled,
 - the interest rate used to discount cash flows is based on market rates at the date of the consolidated financial statements corresponding to the issuance of high quality bonds or obligations.

(2.13.1.4) Accounting criteria for post-employment obligations

The Group classifies post-employment obligations for accounting purposes as follows:

- *Defined contribution plans.* The Group's contributions to defined contribution plans are recognised under "Administrative expenses – Staff expenses" in the consolidated income statement.

If at 31 December 2019 there are any outstanding contributions to be made to the external plan funding the post-employment benefit obligations, the related amount is recognised at its present value under "Provisions - Provisions for pensions and other post-employment defined benefit obligations". At 31 December 2020, there were no outstanding contributions to be made to external defined contribution plans.

- *Defined benefit plans.* Under the caption "Provisions - Provisions for pensions and other post-employment defined benefit obligations" on the liability side of the consolidated balance sheet, the Group recognises the present value of obligations assumed net of the fair value of assets qualifying as "plan assets" (or under "Other assets – Other" on the asset side of the consolidated balance sheet, depending on whether the resulting difference is positive or negative and on whether or not the conditions for recognition are satisfied).

"Plan assets" are defined as those that are related to certain defined benefit obligations, that will be used directly to settle such obligations, and that meet the following conditions:

- they are not owned by the Group, but by a legally separate third party that is not a related party;
- they are only available to pay or fund post-employment benefits for employees;
- they cannot be returned to the Group unless the assets remaining in the plan are sufficient to meet all the benefit obligations of the plan or of the Group to current and former employees, or they are returned to reimburse employee benefits already paid by the Group;
- they may not be non-transferable financial instruments issued by the Group if held by a long-term post-employment benefits fund or entity.

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If the Group has recourse to an insurer to pay part or all of the expenditure required to settle a defined benefit obligation, and it is practically certain that the insurer will reimburse some or all of the expenditure required to settle that obligation, but the insurance policy does not qualify as a plan asset, the Group recognises its right to reimbursement, which in all other respects is treated as a plan asset, under “Insurance contracts linked to pensions” on the asset side of the balance sheet.

In compliance with IAS 19, the Bankia Group has recognised in its consolidated financial statements the liabilities (and/or, as the case may be, the assets) related to post-employment benefit obligations at the present value of the obligations, less the fair value of any plan assets.

Post-employment defined benefit payments are recognised as follows:

- In the consolidated income statement:
 - current service cost;
 - any past service cost and gains or losses on plan settlements;
 - the net interest on the defined benefit liability (asset), which is determined by multiplying the net defined benefit liability (asset) by the interest rate used to estimate the present value of the obligations at the start of the annual reporting period, taking account of any changes in the net defined benefit liability (asset). Net interest comprises the interest income on plan assets, interest cost on the obligation and interest from measuring plan assets at the present value of the cash flows available to the entity from plan curtailments or reduction in future contributions to the plan.
- In the consolidated statement of changes in equity:
 - actuarial losses and gains arising from changes in the present value of the defined benefit obligations resulting from the effects of changes in actuarial assumptions and experience adjustments;
 - the return on plan assets, excluding amounts included in net interest on the net defined benefit liability (asset);
 - any change in the effect of the asset ceiling, excluding amounts included in net interest on the net defined benefit liability (asset).

(2.13.2) Other long-term employee benefits

“Other long-term employee benefits” mainly comprise the early retirement commitments to employees who no longer render services but, not being retirees for legal purposes, continue to hold economic rights against their employers until they become legal retirees. They also comprise any other long-term or similar commitments to employees.

These long-term commitments are recognised under the same caption as post-employment defined benefit plans, except as regards amounts recognised in the consolidated statement of changes in equity, which are recorded in the consolidated income statement, with the special features disclosed below for each specific case.

(2.13.2.1) Early retirement commitments

At 31 December 2020, these commitments were covered by insurance policies and an internal fund.

(2.13.2.2) Commitments derived from the Labour Agreement adopted as a result of the creation of BFA

On 14 December 2010, a majority of labour union representatives at the Cajas entered into an agreement entitled “Labour Agreement in the Framework of the Process of Integration under an IPS entered into by Caja Madrid, Bancaja, Caja Insular de Canarias, Caja Ávila, Caixa Laietana, Caja Segovia and Caja Rioja” (the “Labour Agreement”) as a result of the integration of the Cajas and the creation of BFA (the central body of the IPS) set out in the Integration Agreement approved by the Boards of Directors and ratified at the General Meetings of the Cajas.

The Labour Agreement set forth an array of measures offered to the Cajas employees on an elective basis until 31 December 2012 so that the necessary staff restructuring could be carried out, with staff reduced by approximately 4,594 employees. Such measures included early retirements, relocation, indemnified redundancies, contract suspension and shorter working days.

(2.13.2.3) Labour Agreement - Bankia Restructuring Plan

On 8 February 2013, a labour agreement was entered into with the majority of the Bank’s union representatives, which includes the collective dismissal of up to 4,500 Bank employees, with variable termination benefits depending on the age of the worker and changes to the working conditions of employees that continue to work at the Bank through measures to eliminate or reduce fixed remuneration conditions, variable remuneration conditions, pension plan contributions, entitlements for risk and promotion measures. The agreement encourages voluntary redundancies and employability with the creation of an employment pool for those affected, while also enabling Bankia to move towards an efficiency ratio below 50%.

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(2.13.2.4) Labour Agreement adopted as a result of the creation of BMN

The savings banks or Cajas that founded BMN entered into the so-called "Labour Agreement among the Cajas under the Framework of the Process of Integration under an IPS", which contemplated, among other measures, the resizing of the workforce of the founding Cajas with the extinction of a maximum of 1,049 jobs, coupled with the commitment to continue to contribute to their pension plans and make special payments under certain circumstances. In keeping with the content of the above labour agreements and the nature and characteristics of the commitments, these commitments have been classified as "Other long-term commitments".

(2.13.2.5) Labour agreements entered into with the representatives of BMN's employees

Against the backdrop of BMN's Restructuring Plan, the Bank's management and its employees' representatives entered into a series of agreements which mainly contemplated the modification of employment terms, with the aim of minimising the impact on employment. The measures included paid leaves of absence, contract suspensions, and voluntary leaves of absence.

(2.13.2.6) Workforce Restructuring Agreement due to the merger between Bankia and BMN

As a result of the merger by absorption of BMN by Bankia, on 15 February 2018 a Workforce Agreement was signed, with 92% representation of the Bank's trade unions.

The Workforce Agreement contains a series of voluntary redundancy measures to implement the required restructuring. The collective procedure includes up to a maximum of 2,000 Bank employees, along with geographical mobility arrangements.

The Workforce Agreement also sets the framework for working conditions of Bank employees and the conditions under which BMN employees will be taken on, as well as other labour-related issues.

At 31 December 2020, the Group had covered its liabilities under the aforementioned Labour and Workforce Agreements in terms of outstanding settlements to employees already on the scheme, with appropriate provisions under "Provisions – Pensions and other post-employment defined benefit obligations" (to cover early retirement commitments) and "Provisions – Other provisions" (for the remaining commitments undertaken) on the consolidated balance sheet (see Note 20).

(2.13.2.7) Death and disability

The obligations assumed for coverage of death and disability of serving employees are covered by an insurance policy under the Pension Plan and are recognised in the income statement at an amount equal to the contributions made to the fund.

The amount accrued and paid in 2020 to cover these obligations was EUR 4,234 thousand (EUR 5,757 thousand at 31 December 2019) which is recognised under "Administrative expenses - Staff expenses" in the consolidated income statement for 2020 (EUR 5,681 thousand was covered by the Employee Pension Plan at 31 December 2019).

(2.13.3) Financial assistance for employees

Financial assistance for employees is set out in the Collective Bargaining Agreement for Savings Banks. Certain terms and conditions have been improved via internal agreements. Assistance mainly entails advances, social loans and loans for the acquisition of primary residences.

Where appropriate, the difference between arm's length terms and the interest rates applied for each type of loan mentioned above is recognised as an increase in staff expenses with a balancing entry under "Interest income" in the consolidated income statement.

(2.13.4) Termination benefits

Under current legislation, the Spanish consolidated companies and certain foreign companies are required to pay termination benefits to employees made redundant without just cause. Termination benefits must be recognised when the Group is committed to terminating the employment contracts of its employees and has a detailed formal termination plan. In addition to the commitments described in Note 2.13.2, the Bank signed a labour agreement whose related commitments are adequately covered by provisions recognised at 31 December 2020 (see Note 20).

(2.14) Income tax

The Spanish corporate income tax expense and similar taxes levied on foreign consolidated subsidiaries are recognised in the consolidated income statement, except when they result from a transaction recognised directly in equity, in which case the income tax is also recognised in the Group's equity.

Income tax expense is calculated as the tax payable on taxable profit for the year, after adjusting for variations in assets and liabilities due to temporary differences, tax credits for tax deductions and benefits, and tax losses (see Note 26).

The Group considers that a temporary difference exists when there is a difference between the carrying amount of an asset or liability and its tax base. The tax base of an asset or liability is the amount attributed to that asset or liability for tax purposes. A taxable temporary difference is one that will generate a future obligation for the Group to make a payment to the relevant taxation authorities. A deductible temporary difference is one that will generate a right for the Group to a rebate or a reduction in the amount payable to the related taxation authorities in the future.

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Tax credits and tax loss carryforwards are amounts that, after performing the activity or obtaining the profit or loss giving entitlement to them, are not used for tax purposes in the related tax return until the conditions for doing so established in the tax regulations are met and the Group considers it probable that they will be used in future periods.

Current tax assets and liabilities are the taxes that are expected to be recoverable from or payable to, respectively, the related taxation authorities within 12 months after the reporting date. Deferred tax assets and liabilities are the taxes that are expected to be recoverable from or payable to the related taxation authorities more than 12 months after the reporting date.

Deferred tax liabilities are recognised for all taxable temporary differences. In any case, deferred tax liabilities arising from accounting for goodwill are not recognised.

The Group only recognises deferred tax assets arising from deductible temporary differences and from tax credits and tax loss carryforwards when the following conditions are met:

- Deferred tax assets are only recognised when it is considered probable that the consolidated entities will have sufficient future taxable profit against which these can be utilised; and, in the case of deferred tax assets arising from tax loss carryforwards, when the carryforwards have arisen for identified reasons that are unlikely to be repeated.
- No deferred tax assets or liabilities are recognised if they arise from the initial recognition of an asset or liability (except in the case of a business combination) that at the time of recognition affects neither accounting profit nor taxable profit.

Deferred tax assets and liabilities are reviewed at the end of each reporting period to ascertain whether they remain in force, and the appropriate adjustments are made on the basis of the results of the review.

Note 26.5 explains the main implications of this legislation on the recognised deferred taxes.

Constitution of the Bankia tax group

The Bankia tax group opted to pay taxes under the special tax consolidation scheme regulated by Chapter VII of Title VII of the Revised Spanish Income Tax Law ("TRLIS"), for the tax period commenced on 1 January 2011, and informed the taxation authorities of this decision.

Note 26.1 provides a breakdown of the companies making up the tax group headed by Bankia, S.A.

(2.15) Tangible assets

(2.15.1) Property, plant and equipment for own use

Property, plant and equipment for own use include assets, owned by the Group or held under a lease, for present or future administrative use or for the production or supply of goods and services that are expected to be used for more than one financial year. This category includes, inter alia, items of property, plant and equipment received by the consolidated companies in full or partial settlement of financial assets representing rights to receivables from third parties which are intended to be held for continuing use. Property, plant and equipment for own use are presented on the consolidated balance sheet at acquisition cost, which is the fair value of any consideration given for the asset plus any monetary amounts paid or committed, less:

- The corresponding accumulated depreciation and,
- If relevant, any estimated impairment losses (carrying amount higher than recoverable amount).

The right-of-use assets from leases in which the Group acts as lessee are presented under this item and recognised in accordance with the measurement rules explained in Note 2.11.

Depreciation is calculated using the straight-line method on the basis of the acquisition cost of the assets less their residual value. The land on which the buildings and other structures stand has an indefinite life and, therefore, is not depreciated. Right-of-use assets from leases are depreciated on a straight-line basis over the shorter of the useful life of the underlying asset (determined based on the percentages indicated below) and the lease term.

The depreciation charge for the period is recognised under "Depreciation and amortisation" in the consolidated income statement and is calculated basically using the following depreciation rates (based on the average years of estimated useful life of the various assets):

	Annual rate
Buildings for own use	2%
Furniture and fixtures	10% to 25%
IT equipment	25%

At each reporting date the consolidated companies assess whether there is any internal or external indication that a tangible asset may be impaired (i.e. its carrying amount exceeds its recoverable amount). If this is the case, the carrying amount of the asset is reduced to its recoverable amount and future depreciation charges are adjusted in proportion to the revised carrying amount and to the new remaining useful life (if the useful life has to be re-estimated). When necessary, the carrying amount of property, plant and equipment for own use is reduced with a charge to "Impairment or (-) reversal of impairment on non-financial assets" in the consolidated income statement.

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Similarly, if there is an indication of a recovery in the value of an impaired tangible asset, the consolidated companies recognise the reversal of the impairment loss recognised in prior periods with the related credit to "Impairment or (-) reversal of impairment on non-financial assets" in the consolidated income statement and adjust the future depreciation charges accordingly. Under no circumstances may the reversal of an impairment loss on an asset raise its carrying amount above that which it would have if no impairment losses had been recognised in prior years.

The estimated useful lives of property, plant and equipment for own use are reviewed at least once a year with a view to detecting significant changes therein. If changes are detected, the useful lives of the assets are adjusted by correcting the depreciation charge to be recognised in the consolidated income statement in future years on the basis of the new useful lives.

Upkeep and maintenance expenses on property, plant and equipment for own use are recognised as an expense in the consolidated income statement in the period in which they are incurred.

Property, plant and equipment that require more than one year to be ready for use include as part of their acquisition or production cost the borrowing costs which have been incurred before the assets are ready for use and which have been charged by the supplier or relate to loans or other types of borrowings directly attributable to their acquisition, production or construction. Capitalisation of borrowing costs is suspended, if appropriate, during periods in which the development of the assets is interrupted and ceases when substantially all the activities necessary to prepare the asset for its intended use have been completed.

The Group's buildings for own use that are no longer part of its branch network and that, under current regulations, satisfy the requirements for recognition as non-current assets held for sale, given the existence of a detailed plan for their immediate sale, are measured as described in Note 2.20.

(2.15.2) Investment property

"Investment property" on the consolidated balance sheet reflects the net values of the land, buildings and other structures held to earn rentals or for potential capital appreciation in the event of sale, through potential increases in their market value.

The criteria used to recognise the acquisition cost of investment property, to calculate its depreciation and its respective estimated useful life and to recognise the possible impairment losses thereon are consistent with those described in relation to property, plant and equipment for own use (Note 2.15.1).

However, in the process for estimating impairment losses on investment property foreclosed or received in payment of debt (see Note 2.20) reclassified from non-current assets held for sale to investment property, for example when the property is earmarked for lease, when determining the appropriate method for estimating fair value, the Group assesses whether the lease transaction satisfies the following two requirements:

- The lessee's ability to pay is sufficient to service the lease payments; and
- The lease price indicates that the market value of the leased asset is above its carrying amount

If either of these two requirements is not met, fair value is estimated as explained in Note 2.20 for assets foreclosed or received in payment of debt classified as non-current assets held for sale.

Appendix IX provides further information about real estate assets foreclosed or received by the Group in payment of debt and classified under this consolidated balance sheet heading on the basis of ultimate purpose, as referred to above.

(2.16) Intangible assets

Intangible assets are identifiable non-monetary assets without physical substance which arise as a result of a legal transaction or which are developed internally by the consolidated companies. Only intangible assets whose cost can be estimated reasonably objectively and from which the consolidated companies consider it probable that future economic benefits will be generated are recognised.

Intangible assets are recognised initially at acquisition or production cost and are subsequently measured at cost less any accumulated amortisation and impairment losses.

(2.16.1) Goodwill

Any differences between the cost of equity-accounted investments in consolidated entities and other forms of business combinations, other than those in which no consideration is transferred, carried out with respect to the net fair values of the assets acquired and liabilities assumed, adjusted for the percentage interest acquired in the net assets and liabilities in the case of shareholding purchases, at the acquisition date, are recognised as follows:

- If the acquisition price exceeds the aforementioned fair value, as goodwill under "Intangible assets - Goodwill" on the consolidated balance sheet. In the case of acquisitions of investments in associates or joint ventures accounted for using the equity method, any goodwill that may arise from the acquisition is recognised as forming part of the value of the investment and not as an individual item under "Intangible assets – Goodwill".
- Any negative differences between the cost of acquisition less the aforementioned fair value are recognised, once the measurement process has been reviewed, as income under "Negative goodwill recognised in profit or loss" in the consolidated income statement.

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Positive goodwill (excess of the acquisition price of an investee or business over the net fair value of the assets acquired and liabilities and contingent liabilities assumed from this entity or business) – which is only recognised on the consolidated balance sheet when acquired for consideration – thus represents advance payments made by the acquiring entity for future economic benefits arising from the assets of the entity or business acquired that are not individually and separately identifiable and recognisable.

Goodwill is allocated to one or more cash-generating units that are expected to benefit from the synergies of the business combination. The cash-generating units represent the smallest identifiable group of assets that generates cash inflows for the Group that are largely independent of the cash inflows from other assets or groups of assets of the Group. Each unit or group of units to which the goodwill is allocated:

- Represents the lowest level within the entity at which the goodwill is monitored for internal management purposes.
- Is not larger than a business segment.

The cash-generating units to which goodwill has been allocated are tested for impairment, to which end the goodwill allocated is included in their carrying amount. Impairment tests are carried out at least annually, or whenever there is any indication that an asset may be impaired.

Goodwill is not amortised, but rather is tested for impairment regularly and written down if there is evidence of impairment. A cash-generating unit to which goodwill has been allocated is tested for impairment by comparing the unit's carrying amount, excluding any goodwill attributable to non-controlling interests if the entity has opted not to measure non-controlling interests at fair value, with its recoverable amount.

The recoverable amount of a cash-generating unit is the higher of its fair value less costs to sell and its value in use. To estimate value in use, the Group generally uses models based on the following assumptions:

- The recoverable amount is the value in use of the investment, obtained from the present value of the cash flows that are expected to be obtained from the cash-generating unit, from its ordinary activities (adjusted for extraordinary items) or from the possible disposal thereof.
- Estimated cash flow projections usually have a maximum time horizon of five years and include cyclical growth rates based on various factors such as the economic situation at the time the assessment is performed, growth in the industry, historical rates etc. At 31 December 2020, no estimates had been made with cash flows for longer periods.
- The cash flows are discounted using specific discount rates for each asset, on the basis of a risk-free interest rate which is increased by a risk premium for each investment based on various capital-weighting factors (ratings, internal scorings, etc.).

If the carrying amount of the cash-generating unit is higher than its recoverable amount, the Group recognises an impairment loss. The impairment loss is allocated, first, to reduce the carrying amount of any goodwill allocated to the cash-generating unit, and then, for any remaining amount of the impairment loss, to reduce the carrying amount of the other assets pro rata on the basis of the carrying amount of each asset in the unit. If the entity has opted to measure non-controlling interests at fair value, it would recognise the impairment of goodwill attributable to these non-controlling interests.

Impairment losses on goodwill are recognised in "Impairment or (-) reversal of impairment on non-financial assets – intangible assets" in the consolidated income statement. Impairment losses on goodwill recognised under "Intangible Assets - Goodwill" as indicated in the preceding paragraph cannot be reversed in a subsequent period.

(2.16.2) Other intangible assets

Intangible assets other than goodwill are recorded on the consolidated balance sheet at cost of acquisition or production, net of accumulated amortisation and any impairment losses.

Intangible assets can have an indefinite useful life – when, based on an analysis of all the relevant factors, it is concluded that there is no foreseeable limit to the period over which the asset is expected to generate net cash inflows for the consolidated entities – or a finite useful life, in all other cases.

Intangible assets with an indefinite useful life are not amortised. At the end of each reporting period, however, consolidated entities review the remaining useful life of each asset to confirm that it is still indefinite and, if this is not the case, appropriate action is taken.

Intangible assets with finite lives are amortised using the same criteria as for the depreciation of property, plant and equipment. The annual amortisation of intangible assets with a finite useful life is recognised under "Depreciation and amortisation" in the consolidated income statement. None of the Group's significant intangible assets, other than goodwill, have an indefinite useful life. These intangible assets, which were developed by non-Group companies, have an average useful life of 10 years.

The estimated useful life of these assets is updated periodically through an individual analysis of the various items, considering among other aspects the type of applications, their functional and technical state, and their alignment with the business strategy. According to applicable accounting standards, the effects of changes in useful life are applied prospectively over the remaining estimated years of useful life.

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The consolidated entities recognise any impairment loss on the carrying amount of these assets with a charge to "Impairment or (-) reversal of impairment on non-financial assets - Intangible assets" in the consolidated income statement. The criteria for recognising impairment losses on these assets and any recovery of impairment losses recognised in past years are similar to those used for property, plant and equipment for own use (see Note 2.15.1).

(2.17) Inventories

At 31 December 2020 and 2019, the Group had not recognised any amounts under inventories.

(2.18) Provisions and contingent liabilities

When preparing the consolidated financial statements, the Group's directors make a distinction between:

- Provisions: credit balances covering present obligations at the reporting date arising from past events which could give rise to a loss for the Group, which is considered likely to occur and certain as to its nature, but uncertain as to its amount and/or timing; and
- Contingent liabilities: possible obligations that arise from past events and whose existence will be confirmed only by the occurrence or non-occurrence of one of more uncertain future events not wholly within the control of the consolidated entities, or current obligations of the Group, the settlement of which is unlikely to require an outflow of resources embodying economic benefits, or the amount of which, in extremely rare circumstances, cannot be measured with sufficient reliability.

The Group's financial statements include all significant provisions with respect to which it is considered more likely than not that the obligation will have to be settled. Contingent liabilities are not recognised in the consolidated financial statements, but rather are disclosed in accordance with the requirements of IAS 37.

Provisions are measured based on the best information available on the consequences of the events giving rise to them and estimated at the end of each reporting period. They are used to meet the specific obligations for which they were originally recognised. They may be wholly or partly reversed if these obligations cease to exist or diminish.

In accordance with IAS 37.92, in rare cases, where disclosure of information can be expected to prejudice seriously the Group's position, generally in a class action lawsuit, detailed information does not have to be disclosed but a description of the general nature of the contingencies should be provided.

The recognition and reversal of provisions considered necessary pursuant to the foregoing criteria are recognised with a charge or credit, respectively, to "Provisions or (-) reversal of provisions" in the consolidated income statement, unless expressly indicated otherwise.

(2.18.1) Legal proceedings related to the 2011 IPO

Civil proceedings regarding the invalidity of the subscription of shares.

At present, there are claims being processed, albeit a small number, seeking the invalidity of the subscription of shares issued in 2011 in the public offering for the stock market listing of Bankia, S.A., including those related to subsequent purchases, although in the latter case the claims are residual. In application of prevailing legislation, this contingency was recognised in accordance with the information disclosed in Note 20.

On 19 July 2016, Bankia was informed of the class action suit filed by ADICAE (Spain's Association of Bank, Savings Bank and Insurance Users). These proceedings are currently on hold.

Summary Procedure 1/2018, arising from Preliminary Proceedings No. 59/2012, before the Criminal Chamber of the National High Court (Audiencia Nacional).

Criminal proceedings in which the court admitted the lawsuit filed by Unión Progreso y Democracia against Bankia, BFA and former members of their respective Boards of Directors for consideration. Other criminal complaints by parties purportedly affected by Bankia's IPO (private prosecution) and by persons without such status (class prosecution) were subsequently joined to these proceedings. Bankia raised a total of EUR 3,092 million in July 2011 from the IPO: EUR 1,237 million from institutional investors and EUR 1,855 million from retail investors. Since retail investors have been refunded for virtually the entire amounts invested in the IPO through civil lawsuits or the voluntary repayment process carried out by Bankia, the contingency existing with these parties is considered practically resolved.

On 23 November 2018, as part of the collateral civil liability proceedings, a payment into court of EUR 38.3 million was set. At present, requests for payments into court amounting to EUR 5.8 million have been issued and a decision has yet to be issued by the Court.

On 11 May 2017, the presiding judge of Central Examining Court No. 4 of the National High Court ordered that there was a case to answer, thereby concluding the examination stage, as detailed in Note 20.

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On 17 November 2017, Central Examining Court No. 4 of the National High Court ordered commencement of the trial. Specifically, this order commenced the trial in respect of the crimes of falsification of financial statements (defined in article 290 of Spain's Criminal Code) and investor fraud (article 282 bis of the Criminal Code) against certain former directors and current and former executives of Bankia and BFA, the external auditor at the time of the IPO, and against BFA and Bankia as legal persons. As detailed in Note 20, the State Prosecutor and the FROB presented written submissions seeking the dismissal of the criminal charges against BFA and Bankia. The FROB did not seek secondary civil liability on the part of Bankia or BFA.

On 29 September 2020, Panel 4 of the National High Court's Criminal Chamber delivered a judgment (no. 13/2020) whereby it unanimously acquitted all the defendants in respect of:

Only two prosecutors have lodged the corresponding cassation appeal with the Spanish Supreme Court's Criminal Chamber (namely, the Spanish Association of Minority Shareholders of Listed Companies (AEMEC) and Bochner España, S.L. et al.) against the judgment of 29 September 2020 handed down.

In addition, under the scope of this proceeding, three collateral proceedings are ongoing:

- In the two collateral proceedings regarding the preference shares of Caja Madrid and Bancaja, on 17 May 2018 an order was issued to discontinue the cases as the existence of fraud in the issuance and marketing of preference shares in the knowledge that the investors would lose their investment has not been confirmed.

The two orders were appealed by the private prosecution (not by the public prosecution), with Bankia and BFA (which are not under investigation) having opposed these appeals.

In orders issued on 28 February 2019, the Criminal Chamber of the National High Court dismissed the appeals lodged, confirming the provisional stay, which has since become final.

- In the collateral proceedings regarding the cards, on 3 October 2018 the Supreme Court delivered a judgment confirming the first instance Judgment of 23 February 2017 in which certain former directors and executives of Caja Madrid and Bankia were convicted, and holding that Bankia must be held liable in respect of the civil liability arising from the crime.

On 26 November 2018, an enforcement decree was issued opening individual collateral proceedings for the secondary civil liability of each convicted party, determining and establishing the amounts payable by them.

The Group considered the lawsuit underway in Abbreviated Proceedings 1/2018 (deriving from Preliminary Proceedings No. 59/2012) as a contingent liability with an uncertain outcome.

(2.18.2) Other litigation and/or claims in progress

At the 2020 year end, a number of legal proceedings and claims were underway against the Group in connection with the ordinary course of its business activities. The directors believe that, based on the information available at the reporting date and considering the amounts provided for by the Group to this end (see Note 20), the conclusion of these proceedings and claims will not have a material impact on the Group's equity position.

The main material claims against the Group and their current status are as follows:

Class actions

- Civil proceedings regarding hybrid instruments (preference shares and subordinated bonds). The EUR 246 million provision set aside for this was used in full in 2015. Under the terms of the agreement signed between Bankia and BFA, this provision covers the estimated maximum loss for Bankia derived from the costs arising from the enforcement of judgments against the Bank in the various proceedings against it related to the aforementioned issues. Other class action suits have been filed by ADICAE seeking an injunction and invalidity of the issue and sale of those hybrid instruments. Of the six actions initially brought, three are already concluded as the cassation appeals brought by ADICAE were rejected in two cases, and in a third case the second instance judgment which found in favour of the Bank has since become final as no appeal was lodged, and the main claims filed by the claimant in class actions have been definitively dismissed.
- Claims seeking the invalidity of floor clauses. There were 4,411 legal proceedings underway regarding individual actions seeking invalidity at 31 December 2020. Bankia, in addition to virtually all Spanish financial institutions, is also being sued in a class action brought by ADICAE being conducted at Madrid Mercantile Court 11, under case no. 471/2010. On 12 November 2018, Panel 28 of the Madrid Regional Appellate Court issued judgment no. 603/2018 rejecting the appeals filed by the defendant financial institutions against the first instance judgement partially upholding the claim. This judgment upholds the actions for an injunction and the refund of amounts paid brought by ADICAE and, as a result, orders the defendants, including Bankia, (i) to eliminate the floor clauses in the contracts signed with consumers and (ii) to refund the amounts paid as a result of these clauses, with no statute of limitations. Nevertheless, the judgment of the Madrid Regional Appellate Court does not have any automatic effects with respect to the claim for a refund of the amounts paid which, as the case may be, must be decided upon enforcement of the judgment on a case-by-case basis.
- Lawsuits filed in connection with mortgage arrangement fees. At 31 December 2020 a total of 14,426 legal proceedings are underway.

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The judgments of the Supreme Court regarding mortgage arrangement fees, dated 23 January 2019, significantly reduced the existing economic contingency inasmuch as they clarify that the main component of those expenditures, stamp duty, must be assumed by the borrower in the event that a Court declares the clause null and void, in respect of loans arranged prior to the entry into force of Royal Decree-Law 17/2018, of 8 November, amending the Revised Transfer Tax and Stamp Duty Law.

On 16 July 2020, the CJEU delivered a judgment which, in general terms, does not disallow the criterion upheld by the Supreme Court on the various matters analysed.

As regards mortgage fees, the CJEU confirms the interpretation of the Supreme Court, since, without prejudice to the fact that an unfair term must be regarded as not included with no further modification, a refund of the amounts paid does not apply when the payment was made pursuant to the provisions of national law that lay the obligation to pay all or part of such costs on the consumer. In addition, the CJEU notes that an action to enforce the refund under the declaration of invalidity due to a clause being deemed unfair may be subject to a statute of limitations. In view of the CJEU's decision, the Supreme Court subsequently delivered various judgments which interpret the applicable regulations of national law.

As regards the arrangement fee, the CJEU provides certain instructions for the purpose of determining the validity thereof, which generally fall in line with the considerations on which the Supreme Court has based its assertion that it is transparent and not unfair.

Between 2019 and 2020, Bankia received notice of nine class actions brought by ADICAE seeking an injunction and the invalidity of the fee clauses agreed upon in contracts arranged by different savings banks that formed Bankia. These actions incorporate different parties and they also seek the refund of amounts paid. A first instance judgment has yet to be handed down on three of these nine proceedings. In three cases, the judgments delivered fully dismiss the actions brought (one such judgment is final), while in another three the judgments uphold only those actions seeking invalidity and an injunction, and dismiss the actions seeking a refund of amounts paid.

At the behest of the Spanish Association of Financial Users (ASUFIN), two class actions remain ongoing.

- One of these is seeking the invalidity of the fee clause and the clause that pegs variable interest to the official mortgage price index (IRPH). This particular case, despite joining actions seeking an injunction and a refund of amounts paid, was ultimately admitted only with respect to the injunction sought on the IRPH clause, and after the Valencia Regional Court had rejected the claim for a refund and ASUFIN had withdrawn its action seeking an injunction and invalidity of the fee clause. A first instance judgment has been delivered which dismisses the action seeking an injunction and the invalidity of the IRPH clause. ASUFIN has appealed this decision.
- A further action has been brought by ASUFIN against Bankia and another seven financial institutions and which several customers have joined, seeking an injunction and the invalidity of the fee clause. This is in addition to the action seeking a refund of amounts paid. Bankia answered this claim recently.

In addition, during the year Bankia received notice of a further action brought by ASUFIN against Bankia and another seven financial institutions and which several customers have joined, seeking an injunction and the invalidity of the fee clause. This is in addition to the action seeking a refund of amounts paid. Bankia answered this claim recently.

Therefore, in view of the foregoing, at present and solely as regards the claims filed with the courts, the risk of an impact on the Entity's equity due to them finding against the Group, in terms of a greater contingency, is not significant.

- In relation to mortgage loans linked to the official mortgage price index (IRPH) the Group, as well as other Spanish financial institutions, is party to proceedings in which the claimants have filed a claim with regard to the validity of these mortgage loans.

In its judgment of 3 March 2020, the Court of Justice of the European Union resolved the request for a preliminary ruling from the Court of First Instance no. 38 of Barcelona in relation to the alleged lack of transparency in the contractual terms of consumer mortgage loan agreements that are tied to mortgage loan reference indices (IRPH). This matter arises from a decision delivered by the Supreme Court in December 2017 which ruled, after analysing the contractual terms, that these terms met the principles of transparency. According to the CJEU, it is the responsibility of the Spanish courts to determine in each case whether the information obligations set out in prevailing legislation at the loan arrangement date have been met. Therefore, after analysing how the mortgage loans were marketed and arranged, the Spanish courts shall determine, as the case may be, whether there is a lack of transparency and the consequences thereof.

In the wake of the foregoing judgment of the CJEU, in November 2020 the Spanish Supreme Court handed down five judgments wherein, applying the case law laid down by the Court of Justice of the European Union, it finds the clause not to be unfair.

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At 31 December 2020, prevailing mortgage loans with individuals who are up to date with payments, which include a contractual term linked to the IRPH agreed between the consumer and the Entity, amount to approximately EUR 1,100 million (EUR 1,300 million at 31 December 2019). In addition, an amount of approximately EUR 1,350 million of up-to-date payments (EUR 1,600 million at 31 December 2019) corresponds to loan portfolios relating to the financing of housing and land for which the reference index (IRPH) stipulated in the contractual terms was not agreed between the consumer and the Entity, but rather was imposed by way of a mandatory provision applicable to the consumers in accordance with the legal and de facto framework at the date the contract was signed, such as savings plans for government-subsidised housing. At 31 December 2020, 445 lawsuits are underway with an immaterial economic risk for this kind of proceeding.

Taking into consideration the aforementioned material and procedural prospects and the related existing uncertainty, the Group has treated the matter as a contingent liability, the materialisation and consequences of which are uncertain for Bankia.

- In relation to the proceedings regarding the so-called revolving and deferred payment cards, in March 2020 the Supreme Court delivered a judgment confirming the criterion of the Supreme Court Judgment of November 2015, which establishes the purportedly unfair nature of financing transactions on which the interest rate charged could be considered manifestly disproportionate, although no clear, specific and consistent case law has been established. The total number of lawsuits in relation to revolving cards is 107 and the related economic risk is not significant.

Other lawsuits

- Lawsuits filed in accordance with Law 57/1968. At 31 December 2020, there were 740 legal proceedings in progress.
- Lawsuits related to derivatives. At 31 December 2020, there were 91 legal proceedings in progress.
- Lawsuit brought against Bankia, S.A. and others before First Instance Court No. 48 of Madrid: Bankia, S.A. and Corporación Industrial Bankia, S.A. entered into a settlement agreement with the creditors holding credit rights vis-à-vis Alazor y Accesos de Madrid with respect to the settlement of liabilities, whereby all liabilities required of both companies related to the Comfort Letter and Support Agreement provided were settled, without prejudice to the formal termination of the proceeding on completion of the pertinent procedural steps. Payment of the settlement agreement has not had a significant impact on the Group's profit or loss or its equity.
- Criminal complaint brought by the Banco de Valencia Small Shareholder Association "Apabankval": In 2012, Apabankval lodged a criminal complaint against the Board of Directors of Banco de Valencia and the external auditor in respect of corporate crimes. The amount of the civil liability claims has yet to be quantified. The Apabankval complaint has led to Preliminary Proceedings 65/2013-10 at Central Examining Court No. 1 of the National High Court.

Subsequently, a second criminal complaint was brought by several individuals ("Banco de Valencia"). Against this backdrop, in a ruling dated 6 June 2016, Central Examining Court No. 1 of the National High Court accepted the addition to Preliminary Proceedings 65/2013-10 of a new criminal complaint filed by shareholders of Banco de Valencia against several members of the board of directors of Banco de Valencia, the external auditor and Bankia, S.A. ("in place of Bancaja") for the corporate crime of falsification of financial statements set out in article 290 of the Spanish Criminal Code.

On 13 March 2017, Panel 3 of the National High Court's Criminal Chamber issued a ruling confirming that: (i) Bankia cannot be held criminally liable for the events; and (ii) Bankia should be held secondarily liable in the civil liability case.

As of 1 June 2017, Apabankval represented approximately 351 affected parties. In addition, in keeping with the ruling issued on 8 January 2018, Central Examining Court No. 1 has so far identified another 89 people who have come forward as affected parties whose legal representation and defence has been assumed by the Apabankval association, as provided for in article 113 of Spain's Criminal Procedure Law.

On 6 September 2017, an individual filed a new criminal complaint regarding the crime of falsification of financial statements under article 290.2 of the Criminal Code. On this occasion the complaint has been brought against the former natural person directors in respect of the criminal liability and against Bankia only in respect of the civil liability (with civil liability also being sought of Valenciana de Inversiones Mobiliarias and the external auditor).

On 13 December 2017, Central Examining Court No. 1 ordered the inclusion of BFA, Tenedora de Acciones S.A.U and Fundación Bancaja as parties secondarily liable in the civil liability proceedings. BFA filed an appeal for amendment against this order – which was rejected in a ruling of 13 December 2017 – and a subsidiary appeal to a superior civil court which it has subsequently withdrawn, not because BFA accepts the ruling, but because it plans to re-file the arguments put forward, which it considers solid and well-founded, at a later stage in the proceedings.

On 19 October 2018, a ruling was issued rejecting the FROB's appeal – which BFA joined – against the ruling upholding BFA's secondary civil liability, with one dissenting vote on the understanding that the FROB – a public body – cannot be included in the proceedings because secondary civil liability is being claimed of BFA, of which it is the sole owner.

On 2 December 2019, Central Examining Court No. 1 ruled that there was a case to answer, ordering the continuation of the preliminary proceedings in abbreviated proceedings for the alleged participation in a continuous corporate crime of falsification of Banco de Valencia's financial statements for 2009-2010, provided for and punishable under articles 290.1,

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290.2 and 74 of the Criminal Code, against the members of Banco de Valencia's board of directors and against different companies as parties secondarily liable, including BFA, Bankia, Bankia Hábitat, S.L. and Valenciana de Inversiones Mobiliarias, S.L. These companies have filed appeals for reconsideration with the same Central Examining Court and, subsidiarily, with the Criminal Chamber of the National High Court or directly on appeal.

Following a ruling delivered on 12 June 2020 which dismissed the appeals for amendment filed by the defence, Bankia and BFA each lodged an appeal with the Criminal Chamber of the National High Court.

The Group has treated this contingency as a contingent liability the outcome of which remains uncertain at the reporting date.

(2.19) Non-financial guarantees provided

Deposits or guarantee contracts whereby the Group undertakes to compensate an obligee in the event of non-compliance with a specific obligation other than a payment obligation of a particular debtor of the obligee, such as deposits given to ensure participation in auctions or tender processes, surety bonds, irrevocable promises to provide surety and guarantee letters which are enforceable by law, are considered, for the purpose of preparing these consolidated financial statements, to be insurance contracts.

When the Group provides the guarantees or sureties indicated in the preceding paragraph, it recognises them under "Other liabilities" on the consolidated balance sheet at fair value plus the related transaction costs, which, unless there is evidence to the contrary, is the same as the value of the premiums received plus, if applicable, the present value of cash flows to be received for the guarantee or surety provided, and an asset is recognised simultaneously for the present value of the cash flows to be received. Subsequently, the present value of the fees or premiums to be received is discounted, and the differences are recognised in the consolidated income statement under "Interest income"; the value of the amounts initially recognised in liabilities is allocated on a straight-line basis to the consolidated income statement. In the event that, in accordance with IAS 37, a provision for the surety is required which exceeds the liability recognised, the provision is recognised using criteria similar to those described for the recognition of impairment of financial assets and the amount recorded is reclassified as an integral part of the aforementioned provision.

(2.20) Non-current assets and disposal groups classified as held for sale and discontinued operations

"Non-current assets and disposal groups classified as held for sale" on the consolidated balance sheet include the carrying amounts of items – either individual ("non-current assets") or forming part of a group ("disposal group") or part of a business unit to be disposed of ("discontinued operations") – whose sale is highly probable in their current conditions within one year after the date of the consolidated financial statements. Therefore, the carrying amount of the items – which may be financial or non-financial – is expected to be recovered through a sale transaction rather than through continuing use.

Subsidiaries that meet the criteria to be classified as non-current assets held for sale are fully consolidated and their assets and liabilities are presented and measured accordingly as a disposal group. Investments in associates or joint ventures that meet the requirements of the preceding paragraph are also considered, where appropriate, as non-current assets held for sale.

"Liabilities included in disposal groups classified as held for sale" include the payables related to disposal groups or to discontinued operations of the Group.

In general, non-current assets and disposal groups classified as held for sale are measured at the lower of their carrying amount calculated at the classification date and their fair value less estimated costs to sell. As long as they are classified in this category, tangible and intangible assets, which by their nature would be depreciable, are not depreciated or amortised.

If the carrying amount of the assets exceeds their fair value less costs to sell, the Group adjusts the carrying amount of the assets by the amount of the excess with a charge to "Profit or (-) loss from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations" in the consolidated income statement. If the fair value of such assets subsequently increases, the Group reverses the losses previously recognised and increases the carrying amount of the assets without exceeding the carrying amount prior to the impairment, with a balancing entry in the same heading of the consolidated income statement.

The gains or losses arising on the sale of non-current assets held for sale are presented under "Profit or (-) loss from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations" in the consolidated income statement.

However, financial assets, assets arising from employee remuneration, deferred tax assets and assets under insurance contracts that are part of a disposal group or of a discontinued operation are not measured as described in the preceding paragraphs, but rather in accordance with the accounting policies and rules applicable to these items, which were explained in previous sections of Note 2.

Income and expenses of components classified as discontinued operations are shown, net of the related tax effect, under "Profit or (-) loss after tax from discontinued operations" in the consolidated income statement.

Assets foreclosed or received in payment of debt by the Group, for the full or partial settlement of debtors' payment obligations, are considered non-current assets held for sale unless the Group has decided to make continuing use of the assets or to hold them to earn rentals and/or for future capital appreciation, in which case they are measured as described in Note 2.15.

Initial recognition

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Non-current assets held for sale foreclosed or received in payment of debt are measured initially at the lower of:

- The carrying amount of the financial assets applied.

For the purposes of calculating the carrying amount of the financial assets applied, at the date of initial recognition the allowances or provisions for these financial assets are estimated on the basis of their accounting classification before the delivery, treating the asset as collateral. The amount of the allowance is compared with the previous amount and the difference is recognised as an addition to or release of allowances and provisions, as applicable.

To estimate the allowances and provisions for the financial assets applied, the recoverable amount of the collateral is taken as the fair value less the estimated costs to sell of the asset foreclosed or received in payment of debt, calculated by applying the discounts detailed below to the reference value (updated appraisal value), provided that the entity's experience of sales bears out its ability to realise the asset at its fair value. Otherwise, if the experience of sales does not corroborate this ability, the recoverable amount is estimated by applying to the reference value (updated appraisal value) market information on the Spanish banking sector regarding average discounts for real estate collateral.

- The Group's sales experience bears out its ability to realise the asset as each year it sells at least 25% of its finished dwellings, 20% of its completed offices, commercial premises or multipurpose buildings, and 15% of the rest of its real estate assets.

The market value in full individual appraisals set out in Ministerial Order ECO/805/2003, of 27 March, is used (see Note 25.3.2), to which certain discounts are applied in accordance with the type of foreclosed property. For the types of foreclosed real estate assets for which the Group has appropriate experience of sales and approved internal models, it uses those models to calculate the discounts to apply to the reference value in order to obtain the fair value less the estimated costs to sell.

- The fair value at the date of foreclosure or receipt of the asset less the estimated costs to sell.

The Group has an internal methodology for estimating discounts on the reference value and costs to sell real estate assets foreclosed or received in payment of debt classified as non-current assets held for sale. This methodology is based on the Group's prior experience of sales of similar assets, in terms of time scales, prices and volumes, and the time taken for their sale. The methodology complies with the principles and requirements governing the development and use of internal methodologies for estimating discounts on the reference value and the costs to sell assets foreclosed or received in payment of debt, and it underwent the necessary internal validation process prior to its approval and use.

For assets located in Spain, the Group is considered to have adequate sales experience for a type of real estate if it sells yearly a minimum of 10% of its annual average stock and 75 units of that type.

Real estate assets foreclosed or received in payment of debt classified as non-current assets held for sale for which the Group has not attained sufficient sales volume, meaning therefore that its management unit does not possess the sales experience needed to sell or otherwise realise those assets at their fair value, are measured by applying to the reference value, market information on the Spanish banking sector regarding average discounts for foreclosed assets.

All court costs associated with the claiming and foreclosure of these assets are recognised immediately in the consolidated income statement for the foreclosure period. Registry costs and taxes paid may be added to the value initially recognised provided that, as a result, such value does not exceed the fair value less the estimated costs to sell mentioned in the paragraph above. All expenses related to the administration and management of the assets are recognised in the consolidated income statement in the period in which they are accrued.

Subsequent measurement

Subsequent measurement is made at fair value less estimated costs to sell:

- Fair value less estimated costs to sell is obtained by applying to the reference value the discounts obtained internally or, where appropriate, using market information on the Spanish banking sector regarding average discounts for foreclosed assets according to whether there is appropriate experience of sales for each category or asset, as explained above. The difference vis-à-vis the carrying amount of the assets is recognised as potential impairment or, where appropriate, a reversal of impairment if the Group has the ability to realise the asset at the estimated fair value, up to the amount of accumulated impairment. This ability remains provided the asset foreclosed or received in payment of debt has not exceeded the average holding period of real estate with active sales policies.
- The reference value used to estimate fair value is the market value obtained in appraisals updated at least annually with the following considerations:
 - If fair value is greater than EUR 300,000: the reference value is taken from the latest full individual appraisal available.
 - If fair value is lower than or equal to EUR 300,000: the reference value is the latest available appraisal. Automated appraisal methods – statistical appraisals – can be used. In any event, once this real estate has been on the balance sheet for three years, its valuation is updated by means of the full individual appraisal. After that date, a combination of automated appraisal methods and full individual appraisals may be used (see Note 25.3.2), such that the frequency of the latter is at least every three years.

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In general, the reference value is updated with a full individual appraisal when the properties have remained on the balance sheet for three years, and at least every three years thereafter by a different appraiser to the previous one. In any event, the appraisal company or service must change after two consecutive individual appraisals performed by the same appraisal company or service.

Appendix IX provides further information about real estate assets foreclosed or received by the Group in payment of debt and classified under this consolidated balance sheet heading on the basis of ultimate purpose, as referred to above. Notes 18.3 and 18.5.1 provide details of assets held for sale and assets included in disposal groups, respectively, classified under "Non-current assets and disposal groups classified as held for sale".

(2.21) Consolidated statement of cash flows

The following terms are used in the consolidated statement of cash flows with the meanings specified:

- Cash flows: inflows and outflows of cash and cash equivalents. Cash equivalents are short-term, highly liquid investments that are subject to an insignificant risk of changes in value (where applicable: and, exclusively, since they form part of cash management, bank overdrafts repayable on demand, which reduce the amount of cash and cash equivalents).
- Operating activities: the typical activities of credit institutions and other activities that cannot be classified as investing or financing activities. Operating activities also include interest paid on any financing received, even if this financing is considered to be a financing activity. Activities performed with the various financial instrument categories indicated in paragraph i) above are classified, for the purpose of this statement, as operating activities, except for subordinated financial liabilities, debt certificates including bonds, and investments in equity instruments classified at fair value through other comprehensive income which are not strategic investments. For these purposes, a strategic investment is that made with the intention of establishing or maintaining a long-term operating relationship with the investee, since, inter alia, one of the circumstances that could determine the existence of significant influence prevails, even though this influence does not actually exist.
- Investing activities: the acquisition and disposal of non-current assets and other investments not included in cash and cash equivalents, such as tangible assets, intangible assets, investments in subsidiaries, joint ventures and associates, non-current assets held for sale and associated liabilities, equity instruments classified at fair value through other comprehensive income which are strategic investments.
- Financing activities: activities that result in changes in the size and composition of equity and liabilities that are not operating activities, such as subordinated liabilities and debt certificates including bonds.

In preparing the consolidated statement of cash flows, "Cash and cash equivalents" were considered to be short-term, highly liquid investments that are subject to a low risk of changes in value. Thus, for the purposes of drawing up the statement of cash flows, the balance of "Cash, cash balances at central banks and other demand deposits" under assets on the consolidated balance sheet was considered as cash and cash equivalents.

(2.22) Share-based payment transactions

Share-based remuneration of senior executives and Board members

When the Bank immediately delivers shares to eligible employees with no requirement of a certain period of time before the employee becomes the unconditional owner of the shares, the total services received are expensed under "Staff expenses" in the consolidated income statement, with a balancing entry for the corresponding increase in equity.

When the shares are delivered to employees after a certain period of service, the expense is recognised under "Staff expenses" in the consolidated income statement, along with the corresponding increase in the equity of the company making the payment.

At the grant date on which the employee is entitled to receive share-based payments (the grant date is understood as the date on which employees and the entity agree to the share remuneration format, its periods and conditions), the amount of the remuneration to be paid, i.e. the amount of the increase in the equity of the company making the payment, is measured at the fair value of the shares committed. If fair value cannot be reliably estimated, the shares are measured at their intrinsic value. Changes in the fair value of shares between the grant date and the date on which they are delivered are not recognised. If the shares are measured at their intrinsic value, the variation in this value between the grant date and the date on which they are delivered is recognised with a balancing entry in the consolidated income statement.

The remuneration policy adheres to corporate governance best practices and is in accordance with European regulations concerning remuneration policies at credit institutions and Royal Decree-Law 2/2012 of 3 February, Ministerial Order ECC/1762/2012 of 3 August and Law 10/2014 of 26 June. For details of the settlement scheme, see Note 38.8.

(2.23) Treasury shares

The Entity's Board of Directors approved an update to the Treasury Share Policy, determining the framework for the control and management of transactions with treasury shares and the related risk. All purchases and sales of treasury shares by Bankia or its subsidiaries must comply with prevailing legislation and resolutions adopted at the Annual General Meeting of Shareholders.

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Transactions involving treasury shares are recognised directly in equity, along with all the expenses and potential income that may arise therefrom.

"Own funds – (-) Treasury shares" in consolidated equity reflects the value of Bankia, S.A. treasury shares held by the Group at 31 December 2020 and 2019.

Note 22.2 includes the disclosures required by applicable regulations regarding transactions with treasury shares.

(2.24) Consolidated statement of recognised income and expense

As indicated above, according to the options available under IAS 1, the Group has chosen to present separately, firstly, a statement showing the components of consolidated profit or loss ("Consolidated income statement") and, secondly, a statement that begins with profit or loss for the year and displays the components of other comprehensive income for the year, which in these consolidated financial statements, in accordance with the Circular 4/2017 terminology, is called the "Consolidated statement of recognised income and expense".

The consolidated statement of recognised income and expense presents the income and expenses generated by the Group as a result of its business activity in the year. A distinction is made between income and expenses recognised in the consolidated income statement, on one hand, and, on the other, income and expenses recognised directly in consolidated equity pursuant to prevailing laws and regulations.

Accordingly, this statement presents:

- Consolidated profit or loss for the years ended 31 December 2020 and 2019.
- The net income or expenses temporarily recognised in consolidated equity as valuation adjustments.
- The net income or expenses definitively recognised in consolidated equity.
- The income tax accrued on the items referred to in the preceding two points, except for valuation adjustments to equity-accounted investments in associates or joint ventures, which are presented on a net basis.
- Total comprehensive income for the year, calculated as the sum of the above amounts, showing separately the total amounts attributable to the parent and to non-controlling interests.
- The amount of the income and expenses relating to equity-accounted entities recognised directly in equity is presented in this statement, irrespective of the nature of the related items, under "Share of other recognised income and expense of investments in joint ventures and associates".

The changes in consolidated income and expenses recognised in consolidated equity under "Valuation adjustments" are broken down – subject to the constraints set out above – as follows:

- Revaluation gains/(losses): income, net of the expenses incurred in the year, recognised directly in consolidated equity. The amounts recognised in the year under this item are maintained in this line, but in the same year are transferred to the consolidated income statement, where they are added to the initial value of other assets and liabilities or are reclassified to another item.
- Amounts transferred to the income statement: valuation gains and losses previously recognised in consolidated equity, even in the same year, which are taken to the consolidated income statement.
- Amounts transferred to the initial carrying amount of hedged items: valuation gains and losses previously recognised in consolidated equity, even in the same year, which are accounted for in the initial carrying amount of the assets and liabilities as a result of cash flow hedges.
- Other reclassifications: the amount of the transfers made in the year between valuation adjustment items in accordance with current regulations.

As per IAS 1, all items of the consolidated statement of recognised income and expense may be recognised in the consolidated income statement except "Actuarial gains or (-) losses on defined benefit pension plans".

The balances of these items are presented at their gross amount, and the related tax effect is recognised under "Income tax relating to items that may be reclassified to profit or (-) loss", except as indicated above for "Share of other recognised income and expense of investments in joint ventures and associates".

(2.25) Consolidated statement of changes in equity

The consolidated statement of changes in equity (which appears in these consolidated financial statements as "Consolidated statement of total changes in equity" in accordance with the terminology used by Bank of Spain Circular 4/2017) reflects all the changes in equity, including those due to accounting policy changes and corrections of errors. Accordingly, this statement presents a reconciliation between the carrying amount of each component of consolidated equity at the beginning and at the end of the period, the changes being grouped on the basis of their nature into the following items:

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- Adjustments due to accounting policy changes and correction of errors: changes in consolidated equity as a result of the retrospective restatement of financial statement balances on account of changes in accounting policies or for the correction of errors, if any.
- Income and expense recognised in the year: the aggregate of all items of the consolidated statement of recognised income and expense, as outlined above.
- Other changes in equity: the remaining items recognised in equity such as capital increases or decreases, distribution of results, treasury share transactions, share-based payments, transfers between equity line items, and any other increase or decrease in consolidated equity.

(3) Risk management

Risk management is a strategic pillar of the organisation. The primary objective of risk management is to safeguard the Group's financial stability and asset base, while creating value and developing the business in accordance with the risk tolerance and appetite levels set by the governing bodies. For this purpose, it provides the tools to enable the valuation, control and monitoring of the different risks to which the Group is exposed.

The Board of Directors is responsible for determining the risk control and management policy, and for monitoring the effectiveness of internal control, internal audit, regulatory compliance and systems for risk management, which it carries out, mainly, through the Audit and Compliance Committee and the Risk Advisory Committee.

The Group implements its risk strategy with a view to ensuring stable, recurring income with a medium-low enterprise risk profile. The key pillars of this strategy are:

1. An efficient internal control framework based on a three lines of defence model governed by the following general principles including its scope, covering all types of relevant risks for the Group as a whole, independence of the risk function and the commitment of senior management, adapting behaviour to the highest ethical standards and strict compliance with laws and regulations:
 - Independent and global risk function, which ensures there is adequate information for decision-making at all levels.
 - Objectivity in decision-making, taking account of all relevant (quantitative and qualitative) risk factors.
 - Active management throughout the life of the risk, from preliminary analysis until the risk is extinguished.
 - Clear processes and procedures, reviewed regularly as needs arise, with clearly defined levels of responsibility.
 - Integrated management of all risks through identification and quantification, and consistent management based on a common measure (economic capital).
 - Individual treatment of risks, channels and procedures based on the specific characteristics of the risk.
 - Generation, implementation and promotion of advanced tools to support decision-making which, with efficient use of new technologies, aids risk management.
 - Decentralisation of decision-making based on the approaches and tools available.
 - Inclusion of risk in business decisions at all levels (strategic, tactical and operational).
 - Alignment of the risk function's and risk managers' objectives with the objectives of the Group as a whole, so as to maximise value creation.
2. An effective governance of the risks for which the Group has different inter-related processes that are approved by the Board of Directors on a yearly basis.
 - a) Risk Appetite Framework integrated with the Capital Planning Framework and the Recovery Plan:

The Group has a Risk Appetite Framework approved by the Entity's Board of Directors which represents the management tool via which the Board of Directors: (i) formalises the Group's risk appetite statement, (ii) establishes the mechanism for monitoring risks in such a way as to ensure compliance with the risk appetite, and (iii) reinforces the Group's risk culture.

This Framework explicitly defines the desired and maximum levels of risk (appetite and tolerance) that the Group's governing bodies are willing to assume to achieve the business goals, as well as the mechanisms for monitoring different risks and the responsibilities of the different managements, committees and governing bodies involved.

If any of the key indicators in the Risk Appetite Framework exceed the approved limits, an action procedure is set up, whereby the Management Committee is designated as responsible for proposing to the Risk Advisory Committee, for its analysis and subsequent escalation to the Board of Directors, the action plans that the Group may undertake to bring the indicators back to normal levels.

The Board of Directors reviews the framework annually, updating the desired and maximum levels, and the metrics considered most appropriate for correct monitoring.
 - b) Additionally, the Board of Directors approves the Capital Planning Framework which, together with the RAF, sets out the Entity's strategic lines of action with respect to risk and capital in normal business conditions. Both processes shape the planning of the Group's activities and businesses.

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- c) The Recovery Plan, also approved by the Board of Directors, is put into action to manage any possible critical situations, with the aim of returning the Entity to a normal situation, and includes the measures that the Group could adopt in the hypothetical event of a crisis.
 - d) The Group performs regular Asset Allocation exercises for the purpose of setting objectives and limits on the different portfolios, in terms of both exposure and expected loss, in order to maximise the risk-adjusted return within the global limits established in the Risk Appetite Framework. The annual budget, beyond the requirement to be commensurate with the risk appetite statement, is drawn up comparing business development proposals with the optimal portfolios provided by the system.
 - e) Internal Capital Adequacy Assessment Process (ICAAP) and Internal Liquidity Adequacy Assessment Process (ILAAP) set out by prevailing legislation. In these processes the Group identifies and evaluates the different risks to which it is exposed and carries out a self-assessment of capital and liquidity adequacy in various stress scenarios. The results of the assessments are approved by the Board of Directors and reported to the European supervisor. This exercise is a core element of the single European banking supervision process.
3. An organisational model consistent with the function's general principles. The Group has a transparent organisational structure in which functions and responsibilities are clearly assigned, encompassing senior management right down to the lower levels of the Group, with a responsible management team and an active internal control system, in which the Board of Directors is the body responsible for determining the risk control and management policies, as well as supervising the efficiency of internal control.

Likewise, the Audit and Compliance Committee is responsible for supervising the effectiveness of internal control, internal audit, regulatory compliance and risk management systems, and is able to put forward related recommendations or proposals to the Board of Directors and, where applicable, verify that they are being followed up.

Furthermore, the Risk Advisory Committee advises the Board of Directors on the Group's global current and future propensity to risk, and also proposes to the Board of Directors a policy of controlling and managing the Entity and Group's risks, through the capital self-assessment report.

On the other hand, the Delegated Risk Committee is the body responsible for approving risks within the scope of the powers delegated to it, and for overseeing and administering the exercising of delegated powers by lower-level bodies, without prejudice to the supervisory powers legally corresponding to the Audit and Compliance Committee.

The Group's risk management and control model is based on a three lines of defence model, the main functions and responsibilities of which are as follows:

- The first line of defence comprises the risk management directorates, owners of the risk processes and those responsible for carrying out the controls established in the first line of defence. Specifically, it comprises both the business units and any of the Entity or Group's units that assume risks. These Directorates will perform their activities in compliance with the Group's risk profile, based on the risk appetite and approved policies.

In order to carry out its function of managing the risks on a daily basis within the scope of its activity and responsibility, the first line of defence avails of the means to identify, measure, address and report the assumed risks, applying adequate control and reporting procedures based on the Internal Control Framework in place and the procedures for monitoring the risk limits approved in the Risk Appetite Framework and the Group's policies.

- The second line of defence comprises the Directorates that oversee the risks and define the controls mitigating them, and is composed of the Corporate Risk Directorate and the Corporate Directorate of Regulatory Compliance.

In April 2015, the Board of Directors approved the new Group figure of Chief Risk Officer (CRO), setting out the conditions necessary for performing the function, the main responsibilities of the role, and the rules and powers for appointment and removal. The status reinforces the independence of the Chief Risk Officer, who must maintain constant functional reporting with the Risk Advisory Committee and its Chairman. The CRO also has regular, direct two-way access to senior executives and the governing bodies. Under its management, the main activity of the Corporate Risk Directorate is to carry out the monitoring, control and supervision of all the Group's risks, from a global and forward-looking perspective and, to this end, to maintain a permanent dialogue with the Board of Directors, through the Risk Advisory Committee.

The Corporate Directorate of Regulatory Compliance is responsible for identifying and assessing the risk of non-compliance, by verifying compliance with internal policies and procedures and by exercising adequate controls and coordinating the preparation and implementation of action plans focused on mitigating the risk of non-compliance, reporting the results of this activity to senior executives. It is also responsible for maintaining dialogue with the regulatory and supervisory bodies.

- The third line of defence comprises the Corporate Directorate of Internal Audit. Internal Audit is an independent and objective assurance and consultation activity, created to add value to and enhance the Entity and Group's transactions. Its mission is to improve and safeguard the value of Bankia and its Group, providing objective assurance, advice and risk-based knowledge, helping the Group to meet its objectives by providing a systematic and disciplined approach towards assessing and enhancing the efficiency of the governance, risk management and control processes.

4. The organisational model described is rounded off with a number of committees, including:

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- Management Committee. This committee monitors the general performance of the Group and is presented with the documentation analysed at previous meetings of the organisation's various units. Under the scope of the Risk Appetite Framework, this committee is in charge of proposing the pertinent measures when limits are approached.
- Capital Committee. Among this committee's responsibilities are the monitoring of the regulatory framework and its potential impact on the Group's regulatory capital, and the monitoring and analysis of the main capital ratios and their components, as well as the leverage ratio. It also monitors the capital initiatives being carried out within the Group and the main variations in risk-weighted assets.
- Assets and Liabilities Committee. This committee is in charge of monitoring and managing structural balance sheet and liquidity risks, reviewing the balance sheet structure, business performance and market performance, as well as the financial scenario, product profitability, earnings, etc. bearing in mind the policies and authorities approved by the Board of Directors. This committee must also decide on investment and hedging strategies that enable risks to remain within the approved limits, and also the budget for the year.
- Risk Committee. This committee oversees the operations under its remit and performs a preliminary analysis and assessment of all credit risk which must be resolved by high-ranking levels (Board of Directors and the Board Risk Committee). It is also in charge of designing a risk authorisation system and interpreting regulations to improve operations in accordance with general criteria approved by the Board of Directors. For the derivatives activity in the area of market risk, this committee is responsible for approving discretionary early repayment clauses upon request from the corresponding business or risks directorate.
- Provisioning Committee. Its responsibility is to ensure compliance with prevailing standards for recognising impairment for credit risk; to approve the framework of risk classification policies, criteria and approaches and of allowances under the general framework of policies established by the Board of Directors; to monitor and control the budget of non-performing loans and NPL provisions, as well as the portfolio under special monitoring; to approve the proposals of individual classification following the appearance of evidence of impairment; to authorise the approvals scheme to allow the risks teams to decide on the classification and individualised allowances for borrowers and exposures of smaller amounts; to approve reclassifications (performing, special monitoring, non-performing, write-off) and changes in provisions for portfolios or sets of exposures; to approve the approach for determining credit valuation adjustments (CVA) in the derivatives portfolio; and to monitor the CVA.
- The Models Committee. The main function of this committee is to provide the Board of Directors with a proposal for approving the new models and expanding/modifying already existing models, as well as to provide a proposal for approving the model implementation plan. It is also able to approve non-significant modifications in accordance with the Risks Model Approval Policy. It is also tasked with ensuring the integrity of the ratings and credit scores, establishing criteria for situations not contemplated by the ratings models and setting up a body to monitor the credit scoring systems.
- Global Risk Control and Oversight Committee. Its risk-related functions include controlling, overseeing and exercising effective challenge to trends in the Group's risk profile, the risk appetite approved by the Board of Directors, and the business model from a holistic and forward-looking perspective, analysing any deviations affecting the Group's risk profile, solvency and/or liquidity, proposing, where necessary, any measures considered appropriate.
- Regulatory Compliance Committee. This committee meets monthly. Its risk-related duties mainly include identifying, assessing and managing compliance risks associated with the Group's operations; updating and managing codes of conduct; and drafting, maintaining and overseeing compliance manuals and policies.
- Operational and Technological Risk Committee. It meets on a monthly basis and its risk-related functions include identifying the operational risk profile of the Group through a qualitative self-assessment, analysis of real operational losses and monitoring of the different indicators. It must also propose the annual framework of appetite and tolerance to operational and technological risk and approve the implementation of specific policies and procedures affecting the field of operational and technological risk.
- Cyber Security Committee. It meets on a monthly basis and its functions include monitoring the status of cyber security and reporting periodically to the Board of Directors. In addition, its competencies include strategic decision-making on investments in cyber security and deciding the cyber security risk appetite framework.
- New Products Committee. This committee meets on a monthly basis, unless a meeting does not have to take place in line with planning and information. The functions of this committee include analysing any new product, assuring that all its risks have been identified and assessed, and that these risks can be measured and controlled, approving or rejecting the new projects proposed on the basis of the analyses carried out.

In view of the activity carried out by the Group, the main risks to which it is exposed are as follows:

- Credit risk (including concentration risk), understood as the risk that the Group will assume losses in the regular course of its banking business if its customers or counterparties fail to comply with their contractual obligations. Credit risk arises primarily from the business activity performed by the Individual, Business and Treasury and Capital Markets business areas, as well as from certain investments held by the Group.
- Financial instrument liquidity risk, which relates to the possibility that the funds needed to settle the Group's commitments in a timely manner and to allow its lending activity to grow will not be available at reasonable prices.

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- Structural balance sheet interest rate risk, which relates to potential losses in the event of adverse trends in market interest rates.
- Market risk, which relates to potential losses due to adverse changes in the market prices of the financial instruments with which the Group operates, primarily through the Treasury and Capital Markets area.
- Operational risk, which relates to possible losses arising from failures or shortcomings in processes, personnel or internal systems, or from external events.

(3.1) Exposure to credit risk

(3.1.1) Credit risk management objectives, policies and processes

A. Aim of credit risk management

The Group understands credit risk to be the risk of having to assume losses in the regular course of its banking business if its customers or counterparties fail to comply with their contractual obligations. This risk is inherent to all traditional banking products of financial institutions (loans, credits, financial guarantees given, etc.), and other types of financial assets (debt securities, derivatives and other) and affects financial assets measured at both amortised cost and fair value.

The main principles observed by the Group in its credit risk management are as follows:

- Responsible risk approval. Customers should be offered the financing facilities that are best tailored to their needs, for amounts and under terms and conditions that match their payment ability. The necessary support should be provided so that borrowers of good faith can overcome their financial difficulties.
- Alignment with the Risk Appetite Framework. Policies must be seen as a set of action guidelines and management criteria aimed at ensuring compliance with the Risk Appetite Statement.
- Establishing criteria that feed through to best banking practices. In this vein, specific policies are defined for industries or borrowers that may be sensitive on account of their social implications, for example investments in or financing of controversial businesses, such as arms and ammunition, or that infringe on human rights, or any activity that could compromise the Entity's ethics.
- Transparent environment. A transparent environment is created, integrating the various systems developed to prevent crime and to correct fraud, acting at all times in compliance with applicable law.
- Stable general approval criteria. Although the specific conditions are subject to change, the general guidelines are intended to be permanent.
- Adaptation. The general criteria should be complemented with the development of specific segment and type-of-product criteria so that a well-defined and unambiguous action framework can be established.
- Adapting price to risk. Considering the customer as a whole as well as individual transactions in accordance with the Pricing Policies in force and guaranteeing the achievement of business objectives and coverage of the cost of risk.
- Data quality. To assess risk appropriately, sufficient and accurate data are required. Therefore, the coherence and integrity of the data must be assured.
- Two-way relationship with internal scoring systems. Policies must establish clear lines of action designed to ensure that the internal scoring systems are fed with accurate and sufficient information to guarantee that they work properly. At the same time, decisions related to credit risk must be shaped by the rating of the borrower and/or the transactions.
- Continuous monitoring of exposures. Monitoring is underpinned by the allocation of specific management responsibilities for customers/transactions, supported by policies, procedures, tools and systems that allow for their appropriate identification and assessment throughout their life cycle.
- Fostering the recovery activity. Based on policies, procedures, tools and systems that ensure flexible and early action by the parties, in the form of initiatives and decision-making aimed at minimising the loss from exposures for the Group.

Moreover, the Group's credit risk management is essentially based on:

- The involvement of senior executives in decision-making.
- A holistic view of the credit risk management cycle that enables:
 - Planning of the key credit risk metrics to guide the actions of the business and risk-taking.
 - Specialisation in each stage of risk management, with policies, procedures and resources in keeping with each one: Approval, Monitoring and Recoveries.

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- An approval policy containing criteria that identify, for instance, minimum requirements of transactions and customers, the Group's desired target profile for each type of material risk in line with the Risk Appetite Framework, and the elements or variables to be considered in the analysis and decision-making.
- Preventive system for monitoring customers that involves all business units and forms part of daily management, and which facilitates the Group's recovery in the case of impaired exposures.
- Flexible recoveries model, adaptable to changes in the regulatory environment.
- Tools to assist risk decision-making and measurement, underpinned by credit quality of exposures (scoring, rating), with a view to objectifying and maintaining a risk management policy attuned with the strategy pursued by the Group at any given time.
- Clear separation of roles and responsibilities. The Group understands the risk control function as a function that is spread across the entire organisation and is based on a three-lines-of-defence system.

B. Credit risk management policies

To achieve these objectives, the Group has a "Credit Risk Document Structure" in place approved by the Board of Directors. It also has a Credit Risk Manual.

The purpose of the "Credit Risk Document Structure" is to define, regulate and disseminate common standards of action that act as a benchmark and allow basic rules of credit risk management to be set within the Bankia Group and to determine the roles and responsibilities of the bodies, committees and directorates involved in procedures to identify, measure, control and manage the Group's credit risk, in accordance with its risk appetite.

The structure comprises the Credit Risk Policies, Methods and Procedures Framework, the Credit Risk Policies, Specific Criteria Manuals and Operating Manuals, which regulate, among others, the methodologies, procedures and criteria used for transaction approvals, changes in the terms and conditions thereof, the assessment, monitoring and control of credit risk, including the classification of transactions and assessment of allowances, in addition to defining and establishing effective guarantees, and the recognition and measurement of foreclosed assets or assets received in payment of debt, so that any impairment can be detected early and a reasonable estimate of credit risk allowances can be made. In addition, due to the exceptional circumstances triggered by COVID-19, the document structure includes a document called: "Powers, Policies, Specific Criteria and Control Framework - Covid-19" that outlines the temporary measures implemented, whilst they are applicable, following the declaration of the State of Emergency and the subsequent entry into force of Royal Decree-Laws 8/2020 and 11/2020 due to COVID-19, as well as the exceptions applicable in this context to the rest of the documents for the document structure.

A brief summary of each document is provided below:

- The Credit Risk Policies, Methods and Procedures Framework contains criteria and guidelines to ensure adequate management of the approval, monitoring and recovery process and the proper classification and coverage of transactions over their entire life cycle. It also allows the Group to establish high-level action limits by setting general principles that are adjusted accordingly in the policies.
- The Credit Risk Policies, approved by the Board of Directors, contain a set of rules and main instructions governing the management of credit risk. They are effective and consistent with the general principles set out in the Policies Framework and in the Risk Appetite Framework and are applied across the entire Group. They are used internally to create and develop rules and regulations on risks as regards competencies related to risk strategy, implementation and control. The Specific Criteria Manuals provide a detailed description of the criteria set out in the policies regulating the activities carried out by the Group. They are there for consultative purposes to enable the correct and proper performance of activities in accordance with the requirements previously put in place, thus minimising operational risk. The Specific Criteria Manuals combine with certain policies to provide enterprise-wide risk management.
- The Operating Manuals are methodological documents that develop and expand upon the criteria set out in the Specific Criteria Policies and Manual regulating the activities carried out by the Group. They are there for consultative purposes to enable the correct and proper performance of activities in accordance with the requirements previously put in place, thus minimising operational risk. These manuals are permanently linked with the Credit Risk Policies and the Manuals for Specific Criteria and adhere to the guidelines set out, as well as including sufficiently detailed points of increased relevance for credit risk management purposes.

C. Assessment, monitoring and control of credit risk

Risk is managed in accordance with the limits and instructions established in the policies, underpinned by the following processes and systems:

- Transaction approvals and amendments
- Transaction monitoring

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- Transaction recoveries
- Concentration risk management
- Risk projection
- Risk-adjusted return
- Business revitalisation
- Risk classification
- Risk quantification

Approval and amendment of credit risk transactions

When arranging credit risk positions, the Group carefully assesses the creditworthiness of the customer or counterparty by obtaining information on any existing or proposed risk transactions, the collateral provided and payment capacity, among other factors, considering the risk-adjusted return expected by the Group on each transaction.

To this end, the Group's Approval Policy is aligned with the standards established by senior executives in terms of segments, products, markets, risk-adjusted return and other variables, and is in keeping with the management objectives set out in the Risk Appetite Framework. The policies include general approval principles, underpinned by the following cornerstones:

- Adaptation to the Entity's general strategy.
- Customer view as a whole, prioritising integral customer management.
- Classification of customers into risk segments for the purpose of identifying, measuring and assessing the risks in the most comprehensive and accurate manner.
- Borrowers' payment capacity.
- Proportionality with the debt-equity level and generating of recurring profit, prioritising the diversification of risks, avoiding significant risk concentrations and establishing sound control and mitigation mechanisms.
- Harmonised application, in concordance with the corporate risk criteria.
- Dynamic management, evaluating continuously the level of exposure, economic and financial situation and solvency of the borrowers, level of coverage of guarantees, etc.
- Data quality, with reliable, complete and updated information on the situation and financial needs of the parties involved.
- Delegation and Membership: organisation under a system of delegation of powers based on a pyramid structure starting with the Board of Directors and with the aim of being in a position to efficiently respond in a timely manner and on due form to customer requests for financing.
- No self-granting of asset transactions, to oneself or for the family members of those persons with granting and other powers rendered by the Group.
- Proactive granting via the use of dynamisation tools that favour and speed up the processes of granting and arranging financing transactions.

The approval policies are governed by credit scoring systems, which allow a response to be given that is objective, consistent and coherent with the Group's risk policies and risk appetite. The scoring systems not only rate risk, but also produce a binding recommendation in accordance with the most restrictive of the three following components:

- Score. Cut-off points are established using risk-adjusted return (RAR) criteria or by determining the maximum default level. Based on the rating given by the model, there are three possible outcomes:
 - Reject, if the score is below the lower cut-off point.
 - Review, if the score is between the lower and higher cut-off points.
 - Accept, if the score is above the higher cut-off point.
- Indebtedness. The level of indebtedness is established based on the financial burden the transaction represents vis-à-vis the stated net income of the applicants. In no case may the resulting available income after allowing for debt servicing represent a noticeable restriction on the borrower's ability to cover their family living expenses. Specifically, in the mortgage segment,

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the longer the term of the loan, the lower the maximum limit of indebtedness with a view to mitigating the increased sensitivity to fluctuations in interest rates.

- Exclusion filters. The Group uses databases, both internal and external, that provide information on the credit, financial and equity position of the customers or counterparties; the existence of significant incidents in the position of the customers or counterparties may lead to a transaction being rejected. Additionally, a set of criteria are established that limit the maximum terms of financing, in absolute terms and in relation to the age of the applicants or the maximum funds that can be extended.

A key issue for the mortgage segment is the set of criteria that define the eligibility of assets as mortgage collateral and the valuation criteria. In particular, the risk assumed vis-à-vis the borrower cannot depend substantially on the potential return the borrower may obtain on the mortgaged property, but rather the borrower's ability to repay the debt by other means. Meanwhile, only appraisals by Bank of Spain authorised appraisers are accepted. These are regulated by Royal Decree 775/1997, of 30 May, on the legal framework governing the certification of services and appraisal companies, thus ensuring the quality and transparency of the appraisals. In addition, appraisal values must be calculated as set out in Ministerial Order ECO/805/2003, of 27 March, on rules for the valuation of properties and certain financial rights, taking into consideration Bank of Spain Circular 4/2017.

However, both Ministry of Economy and Finance Order EHA/2899/2011, of 28 October, on transparency and consumer protection in banking services, and Bank of Spain Circular 5/2012, of 27 June, to credit institutions and payment service providers, on the transparency of banking services and responsible lending, also introduce, as a feature of responsible consumer lending, the requirement for borrowers to provide the institutions with complete and accurate information on their financial position and their intentions and needs regarding the purpose, amount and other conditions of the loan or credit, and that they in turn be adequately informed about the characteristics of the products that are suitable for their needs and the inherent risks thereof. Law 5/2019, of 15 March, on real estate credit agreements, includes provisions aimed at promoting legal security, transparency and understanding with respect to contracts and their clauses, and a fair balance between the parties. This legislation contains rules on transparency and conduct that impose obligations on lenders and loan brokers, and their appointed representatives. It completes and improves the current framework set forth in Ministry of Economy and Finance Order EHA/2899/2011 and Law 2/2009, of 31 March, governing customer loan and mortgage agreements and brokerage services in the execution of loan or credit contracts.

In this regard, the Group has responsible approvals policies for loans and credits, which, as mentioned above, establish the need to offer customers financing facilities that best adapt to their needs, adjusting the terms and conditions and the amounts borrowed to the borrower's payment ability, providing the necessary information so that borrowers of good faith can overcome their financial difficulties, and making the required pre-contractual information available to the customer, which is stored in their file.

In relation to changes in authorised credit transactions, Appendix VIII shows a summary of the policies and standards established by the Group for refinancing or restructuring transactions, in addition to quantitative information relating to these transactions.

Monitoring of credit risk transactions

The monitoring function avails of a series of general criteria on which this activity is hinged, irrespective of the segment in question, as follows:

- Anticipation: monitoring must be of a significantly preventive nature to be truly effective.
- Proactivity: monitoring must be proactive and permanent from the date the transaction is granted until its cancellation.
- Efficiency: the level of enforceability with specific criteria is highly relevant.
- Added value: the monitoring tasks enable an information base to be obtained from which management reports can be produced relating to the customer portfolio, and which are backed by the definition of risk admission criteria and, in addition, speed up the process of managing collection of payments from impaired customers.
- Integral view of the customer, with an approach that is geared towards the overall customer risk position and not just towards an individual contract.
- Integral view of the portfolio: it is very important to analyse the portfolio at macro level in order to obtain micro conclusions.

Recovery of credit risk transactions

Recovery management is defined as a comprehensive process that begins even before a payment is missed, covering all phases of the recovery cycle until a solution is reached, whether amicable or contentious.

Early warning models are applied in lending to retail customers. They are designed to identify potential problems and offer solutions, which may entail adapting the conditions of the loan. In fact, a large number of mortgage loan renegotiations during the year resulted from the proposals put forward proactively by the Group.

With business loans, the system of levels described above has the same objective: proactive management of non-performing loans. Therefore, the entire portfolio is monitored in such a way that default only arises from an unsuccessful prior negotiation.

Concentration risk management

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The Group uses a set of tools to analyse and monitor the concentration of risks. First, as part of the calculation of economic capital, it identifies the component of specific economic capital as the difference between systemic economic capital (assuming maximum diversification) and total economic capital, which includes the effect of the concentration. This component enables a direct measure of concentration risk to be obtained. An approach similar to that used by ratings agencies is applied, paying attention to the weight of the main risks with respect to the volume of capital and income-generation ability.

Risk projection

Stress test models are another key element of credit risk management, allowing for the risk profiles of portfolios and the sufficiency of capital under stressed scenarios to be evaluated. The tests are aimed at assessing the systemic component of risk, while also bearing in mind specific vulnerabilities of the portfolios. The impact of stressed macroeconomic scenarios on risk parameters and migration matrices is assessed, allowing expected loss under stress scenarios and the impact on profit or loss to be determined.

Risk-adjusted return

The profitability of a transaction must be adjusted by the costs of the various related risks, not only the cost of the credit. And it must be compared to the volume of capital that must be assigned to cover unexpected losses (economic capital) or to comply with regulatory capital requirements (regulatory capital).

RAR (risk-adjusted return) is a core risk management tool. In wholesale banking, pricing powers depend on both the RAR of the new transactions proposed and the RAR of the relationship, considering all the outstanding business with a customer. In retail banking, RAR is considered to determine approval criteria (cut-off points) in accordance with the fees in effect at any given time. The Board, through the Risk Advisory Committee, is informed regularly on the RAR of all the lending portfolios, distinguishing between the total portfolio and new business.

Business revitalisation

One of Risk Management's functions is to create value and develop the business in accordance with the risk appetite established by the governing bodies. In this respect, the Deputy General Directorate of Credit Risk is equally responsible for revitalising the lending business, providing tools and establishing criteria that identify potential customers, simplify the decision-making processes and allocate risk lines, always within pre-defined tolerance levels. It has tools and pre-authorisation and limit assignment processes for lending to both companies and retail customers.

Risk classification

Rating and scoring tools are used to classify borrowers and/or transactions by risk level. Virtually all segments of the portfolio are classified, mostly based on statistical models. This classification not only aids in decision-making but allows for the addition of the risk appetite and tolerance decided by the governing bodies through the limits established in the policies.

The Models Committee reviews and decides on scorings and ratings for non-retail borrowers, which as such are subject to ratings. Its objective is to achieve consistency in decisions on the ratings of the portfolio and include any information that is not contained in the models and could affect these decisions.

The Models Committee also ensures that the credit scoring system works properly and proposes potential changes in criteria for decision-making to the Risk Committee. The Group has both approval (reactive) and performance (proactive) scoring models. There are also recovery models applicable to parties in default.

Risk classification also includes the "monitoring levels system". This system aims to develop proactive management of risks related to business activities through classification into four categories:

- Level I or high risk: risks to be extinguished in an orderly manner.
- Level II or medium-high risk: reduction of the risk.
- Level III or medium-low risk: maintenance of the risk.
- All other exposures deemed performing exposures.

The level is determined in accordance with the rating, as well as other factors, e.g. activity, accounting classification, existence of non-payment, the situation of the borrower's group, etc. The level determines the credit risk authorisation powers.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Risk quantification

Credit risk is quantified through two measures: expected loss on the portfolio, which reflects the average amount of losses and is related to the calculation of provisioning requirements, and unexpected losses, which is the possibility of incurring substantially higher-than-expected losses over a period of time, affecting the level of capital considered necessary to meet objectives (economic capital).

The credit risk measurement parameters derived from internal models are exposure at default (EAD), probability of default (PD) based on the rating, and loss given default (LGD) or severity.

Expected loss, obtained as a product of the previous parameters, represents the average amount expected to be lost on the portfolio at a given future date. This is the key metric for measuring the underlying risks of a credit portfolio as it reflects all the features of transactions and not only the borrower's risk profile. Expected loss allows a constrained assessment of a specific real or hypothetical economic scenario or refers to a long-time period during which a full economic cycle may have been observed. Which concept of expected loss is more appropriate will depend on the specific use.

The Group uses internal methodologies to make collective estimates of credit risk allowances. In line with the Group's internal models for estimating capital requirements, this internal methodology includes the calculation of losses, based on internal data, through own estimates of credit risk parameters.

With the economic capital model, extreme losses can be determined with a certain probability. The difference between expected loss and value at risk is known as unexpected loss. The Group must have sufficient capital to cover potential losses; therefore, the greater the coverage, the higher the solvency. This model simulates default events and can therefore quantify concentration risk.

(3.1.2) Exposure to credit risk by segment and activity

The maximum credit risk exposure for financial assets recognised on the accompanying consolidated balance sheets is their carrying amount. The maximum credit risk exposure for financial guarantees extended is the maximum amount the Group would have to pay if the guarantee were enforced.

At 31 December 2020 and 2019, the original credit risk exposure net of impairment for credit risk, without deducting collateral or any other credit enhancements received, and without applying the credit conversion factors, grouped in accordance with the main exposure segments and activities established, is as follows:

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31 December 2020

SEGMENT AND ACTIVITY	Financial assets held for trading	Non-trading financial assets mandatorily at fair value through profit or loss	Financial assets designated at fair value through profit or loss	Financial assets at fair value through other comprehensive income	Financial assets at amortised cost	Derivatives – Hedge accounting	Loan commitments, financial guarantees and contingent commitments given
Loans and advances	-	11,192	-	-	125,910,040	-	43,227,511
Credit institutions	-	-	-	-	4,915,769	-	335,633
General government	-	-	-	-	5,678,325	-	1,354,083
Other financial corporations	-	-	-	-	2,553,215	-	3,731,746
Companies	-	11,192	-	-	40,618,454	-	31,909,499
Households	-	-	-	-	72,144,277	-	5,896,550
Mortgage loans	-	-	-	-	64,495,059	-	-
Consumer credit	-	-	-	-	5,082,317	-	-
Cards	-	-	-	-	951,955	-	-
Other	-	-	-	-	1,614,946	-	-
Debt securities	80,554	193	-	8,564,092	37,495,038	-	-
Credit institutions	-	-	-	6,367	25,025	-	-
General government	80,554	-	-	8,256,076	18,847,150	-	-
Other financial corporations	-	143	-	44,707	18,562,664	-	-
Companies	-	50	-	256,942	60,199	-	-
Households	-	-	-	-	-	-	-
Equity instruments	684	-	-	59,543	-	-	-
Derivatives	6,686,668	-	-	-	-	2,451,227	-
Total	6,767,906	11,385	-	8,623,635	163,405,078	2,451,227	43,227,511
<i>Memorandum item: Breakdown of general governments by country</i>							
Spanish general government	80,554	-	-	8,066,396	18,669,753	-	1,354,083
Italian general government	-	-	-	-	5,695,075	-	-
French general government	-	-	-	189,680	99,563	-	-
Other general governments	-	-	-	-	61,084	-	-
Total	80,554	-	-	8,256,076	24,525,475	-	1,354,083

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31 December 2019

SEGMENT AND ACTIVITY	Financial assets held for trading	Non-trading financial assets mandatorily at fair value through profit or loss	Financial assets designated at fair value through profit or loss	Financial assets at fair value through other comprehensive income	Financial assets at amortised cost	Derivatives – Hedge accounting	Loan commitments, financial guarantees and contingent commitments given
Loans and advances	-	34,518	-	-	122,900,453	-	36,704,675
Credit institutions	-	23,263	-	-	5,467,442	-	363,116
General government	-	-	-	-	4,885,268	-	912,487
Other financial corporations	-	-	-	-	1,960,074	-	3,172,284
Companies	-	11,255	-	-	35,310,571	-	26,716,202
Households	-	-	-	-	75,277,098	-	5,540,586
Mortgage loans	-	-	-	-	66,829,665	-	-
Consumer credit	-	-	-	-	5,547,783	-	-
Cards	-	-	-	-	889,748	-	-
Other	-	-	-	-	2,009,902	-	-
Debt securities	170,795	237	-	11,906,055	33,067,987	-	-
Credit institutions	-	-	-	18,020	25,006	-	-
General government	160,898	-	-	11,447,063	14,268,694	-	-
Other financial corporations	-	148	-	79,319	18,774,287	-	-
Companies	9,897	89	-	361,653	-	-	-
Households	-	-	-	-	-	-	-
Equity instruments	1,381	-	-	75,817	-	-	-
Derivatives	6,518,725	-	-	-	-	2,498,821	-
Total	6,690,901	34,755	-	11,981,872	155,968,440	2,498,821	36,704,675
<i>Memorandum item: Breakdown of general governments by country</i>							
Spanish general government	142,413	-	-	11,155,671	14,898,125	-	912,487
Italian general government	18,485	-	-	102,197	4,154,793	-	-
French general government	-	-	-	188,291	101,044	-	-
Other general governments	-	-	-	904	-	-	-
Total	160,898	-	-	11,447,063	19,153,962	-	912,487

(3.1.3) Breakdown of exposure by product

Credit risk exposure net of impairment for credit risk at 31 December 2020 and 2019, by product (excluding equities), is shown in the table below. Loans and credit make up 75.73% at 31 December 2020 (64.50% at 31 December 2019). Fixed income products are the second-highest exposure, accounting for 20.56% at 31 December 2020 (23.08% at 31 December 2019). The breakdown at 31 December 2020 and 2019 is as follows:

31 December 2020:

(in thousands of euros)

PRODUCT	Financial assets held for trading	Non-trading financial assets mandatorily at fair value through profit or loss	Financial assets designated at fair value through profit or loss	Financial assets at fair value through other comprehensive income	Financial assets at amortised cost	Derivatives – Hedge accounting	Loan commitments, financial guarantees and contingent commitments given
Loans and credit	-	11,192	-	-	120,994,271	-	28,997,814
Fixed income	80,554	193	-	8,564,092	37,495,038	-	-
Interbank deposits	-	-	-	-	4,915,769	-	-
Bank guarantees and documentary credits	-	-	-	-	-	-	14,229,697
Derivatives	6,686,668	-	-	-	-	2,451,227	-
Total	6,767,222	11,385	-	8,564,092	163,405,078	2,451,227	43,227,511

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31 December 2019:

(in thousands of euros)

PRODUCT	Financial assets held for trading	Non-trading financial assets mandatorily at fair value through profit or loss	Financial assets designated at fair value through profit or loss	Financial assets at fair value through other comprehensive income	Financial assets at amortised cost	Derivatives – Hedge accounting	Loan commitments, financial guarantees and contingent commitments given
Loans and credit	-	34,518	-	-	117,433,011	-	23,632,897
Fixed income	170,795	237	-	11,906,055	33,067,987	-	-
Interbank deposits	-	-	-	-	5,467,442	-	-
Bank guarantees and documentary credits	-	-	-	-	-	-	13,071,778
Derivatives	6,518,725	-	-	-	-	2,498,821	-
Total	6,689,520	34,755	-	11,906,055	155,968,440	2,498,821	36,704,675

(3.1.4) Credit quality

All ratings appearing in this section reflect definitions equivalent to those given by the Standard & Poor's scale.

The rating system designed by the Group primarily covers two dimensions:

- Risk of default by the borrower: reflected in the probability of default (PD) by the borrower or in the rating.
- Transaction-specific factors: reflected in loss given default (LGD), such as guarantees or interests in various tranches of leveraged financing. The term also constitutes a major factor.

The rating system used makes a distinction between the following:

- Exposure through companies, sovereigns, institutions and banks: each exposure through a single borrower is given the same credit quality grading (known as borrower grade), regardless of the nature of the exposures. This is known as the borrower rating.
- Retail exposures: the systems focus both on borrower risk and the characteristics of the transactions. This is known as scoring.

There are three different types of rating:

- External rating: this refers to the ratings issued by external rating agencies (S&P, Moody's and Fitch).
- Automatic rating: these ratings are obtained through internal models, depending on the segment to which the customer belongs.
- Internal rating: these are the final ratings assigned to customers when all the available information has been reviewed. The internal rating may be the external rating, the automatic rating or the rating determined by the Rating Committee from all the information analysed.

Customers form part of the same rating system and therefore when the financial information is added to the corporate system (NEO), the rating is automatically produced by the appropriate model.

Credit quality. Exposure and average rating/scoring by segment

The breakdown by segment of the Group's credit risk exposure net of impairment for credit risk at 31 December 2020 and 2019, excluding equities and derivatives, with the average ratings per segment, is as follows:

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31 December 2020

(in thousands of euros)

SEGMENT	With rating		Without rating
	Amount	Average rating	Amount
Credit institutions	5,208,232	A-	73,397
General government	34,077,430	A-	98,770
Other financial corporations	21,235,207	BBB+	3,647,652
Companies	70,407,233	BB+	70,850
Households	74,960,205	BB	847,225
Mortgage loans	62,416,358	BB	270
Consumer credit	4,996,300	BB	78
Cards	935,868	BB-	513
Other	6,611,679	BB-	846,364
Total (excluding default)	205,888,307	BBB-	4,737,894
Total (default)	4,662,419	D	-

31 December 2019

(in thousands of euros)

SEGMENT	With rating		Without rating
	Amount	Average rating	Amount
Credit institutions	5,565,642	A-	296,801
General government	31,564,061	A-	14,734
Other financial corporations	21,057,456	A-	3,110,429
Companies	58,761,666	BBB-	605,928
Households	77,509,734	BB+	1,235,582
Mortgage loans	64,880,524	BBB-	1
Consumer credit	5,476,386	BB-	662
Cards	877,534	BB-	662
Other	6,275,290	BB	1,234,257
Total (excluding default)	194,458,559	BBB-	5,263,474
Total (default)	5,062,686	D	-

Credit quality. Rating distribution for exposures through credit institutions, general government and financial corporations

The distribution of the exposure net of impairment for credit risk by credit ratings at 31 December 2020 and 2019 is shown in the table below:

(in thousands of euros)

RATING	31/12/2020	31/12/2019
AAA to A-	46,296,483	45,670,830
BBB+ to BB-	13,859,913	11,922,630
B+ to B-	239,557	412,466
CCC+ to C	124,916	78,499
Not rated	3,819,819	3,421,964
Default	50,769	50,982
Total	64,391,457	61,557,371

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Credit quality. Rating distribution for exposures through companies

The distribution of the exposure net of impairment for credit risk by credit ratings at 31 December 2020 and 2019 is shown in the table below:

(in thousands of euros)		
RATING	31/12/2020	31/12/2019
AAA to A-	8,952,977	6,589,357
BBB+ to BB-	48,958,924	41,899,429
B+ to B-	11,875,732	9,983,898
CCC+ to C	619,599	390,762
Not rated	70,851	605,928
Default	2,378,253	2,940,294
Total	72,856,336	62,409,668

Credit quality. Rating distribution for exposures through households

The distribution of the exposure net of impairment for credit risk by credit ratings at 31 December 2020 and 2019 is shown in the table below:

(in thousands of euros)		
RATING	31/12/2020	31/12/2019
AAA to A-	28,816,825	8,141,229
BBB+ to BB-	32,067,275	49,994,858
B+ to B-	12,357,338	19,218,720
CCC+ to C	1,718,767	155,883
Not rated	847,225	1,235,582
Default	2,233,397	2,071,411
Total	78,040,827	80,817,683

Credit quality. Historical default rates

The Group's default rate, understood as the ratio of non-performing exposures at any given time to the Group's total credit risk, stood at 4.75% at 31 December 2020 (5.04% at 31 December 2019). At 31 December 2019 this rate would have increased to 5.29% had non-performing exposures classified under non-current assets and disposal groups classified as held for sale (see Note 18) been considered.

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(3.1.5) Concentration of risks

Appendix X provides information on risk concentration by activity and geographic area.

The table below shows information concerning the diversification of risks by business sector, measured by credit risk, excluding equities and derivatives, in accordance with the borrower's NACE code and regardless of the purpose of the financing at 31 December 2020 and 2019:

(in thousands of euros)

SECTOR	31/12/2020		31/12/2019	
	Thousands of euros	%	Thousands of euros	%
Food	1,123,146	0.52%	1,018,970	0.50%
Associations	14,311	0.01%	50,333	0.02%
Automotive and auto services	2,685,923	1.25%	2,246,734	1.10%
Wholesale	8,464,987	3.93%	6,979,378	3.41%
Retail	3,167,232	1.47%	2,201,804	1.08%
Construction and development (*)	12,344,950	5.73%	10,789,361	5.27%
Manufacture of machinery and equipment	4,110,992	1.91%	3,284,791	1.60%
Manufacture of intermediate products	5,714,780	2.65%	4,706,941	2.30%
Finance	26,844,716	12.47%	28,104,119	13.72%
Catering and tour operators	3,369,357	1.57%	2,438,398	1.19%
Food, beverages and tobacco industry	3,713,417	1.72%	3,331,889	1.63%
Basic manufacturing, textiles, furniture	1,027,067	0.48%	830,395	0.41%
Mining, energy and infrastructure	5,302,849	2.46%	4,650,834	2.27%
Public sector	33,755,626	15.68%	31,049,552	15.16%
Corporate services	6,042,504	2.81%	4,385,494	2.14%
Leisure, culture, health and education	5,249,727	2.44%	5,007,842	2.45%
Utilities: electricity, gas, steam and water	6,442,732	2.99%	6,225,304	3.04%
Telecommunications	1,444,307	0.67%	1,315,525	0.64%
Transport	2,624,759	1.22%	2,323,672	1.13%
Other sectors (including households)	81,845,238	38.02%	83,843,384	40.94%
TOTAL	215,288,620	100.00%	204,784,720	100.00%

(*) Including financing not related to property development.

The Group regularly monitors major customer exposures, and these are periodically reported to the Bank of Spain.

(3.1.6) Netting agreements and collateral agreements

In addition to amounts that can be offset in accordance with IAS 32 (see Note 2.6), there are other offsetting (netting) and collateral agreements that effectively reduce credit risk, but do not meet the criteria for offsetting in the financial statements.

The table below lists these derivatives, including separate details of the effects of the arrangements and the collateral received and/or extended.

Amounts related to cash collateral and collateral in financial instruments are shown at their fair values. Offset rights are related to the guarantees and collateral in cash and financial instruments and depend on non-payment by the counterparty:

(in thousands of euros)

Derivatives (trading and hedging)	31/12/2020		31/12/2019	
	Assets	Liabilities	Assets	Liabilities
Gross exposure	17,625,477	15,327,719	15,779,616	13,328,350
Netting of accounts (Notes 9 and 13)	(8,487,582)	(8,487,582)	(6,762,070)	(6,762,070)
Carrying amount	9,137,895	6,840,137	9,017,546	6,566,280
Netting agreements	(4,730,122)	(4,730,122)	(4,549,919)	(4,549,919)
Collateral (*)	(3,533,130)	(2,020,778)	(3,573,881)	(1,999,857)
Net exposure	874,643	89,237	893,746	16,504

(*) Includes securities received as collateral.

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In addition, under the framework of repurchase and reverse repurchase transactions carried out by the Group (see Note 27.1), there are other agreements entailing the receipt and/or delivery of the following guarantees or collateral in addition to the contractual guarantees in the transactions:

(in thousands of euros)					
Collateral	31/12/2020		31/12/2019		
	Delivered	Received	Delivered	Received	
Cash	25,425	10,979	1,079		30,829
Securities	-	2,567	8,851		-
Total	25,425	13,546	9,930		30,829

(3.1.7) Exposure through collateral received and other credit enhancements

At 31 December 2020 and 2019 the distribution, by segments, of exposure net of impairment for credit risk, excluding equities and derivatives, with collateral and other credit enhancements is as follows:

31 December 2020

(in thousands of euros)					
SEGMENT	Exposure net of impairment				
	Mortgage collateral	Other collateral	Personal guarantee	Other guarantees	TOTAL
Credit institutions	-	2,751,895	2,530,899	-	5,282,794
General government	165,059	25,858	33,979,277	45,995	34,216,189
Other financial corporations	84,474	272,642	24,535,264	95	24,892,475
Companies	7,884,261	4,671,447	60,159,453	141,174	72,856,335
Households	64,495,059	73,184	13,447,190	25,394	78,040,827
Mortgage loans	64,495,059	-	-	-	64,495,059
Consumer credit	-	5,297	5,074,125	2,895	5,082,317
Cards	-	-	951,955	-	951,955
Other	-	67,887	7,421,110	22,499	7,511,496
TOTAL	72,628,853	7,795,026	134,652,083	212,658	215,288,620

31 December 2019

(in thousands of euros)					
SEGMENT	Exposure net of impairment				
	Mortgage collateral	Other collateral	Personal guarantee	Other guarantees	TOTAL
Credit institutions	-	-	5,866,485	-	5,866,485
General government	182,956	142,282	31,296,108	1,003	31,622,349
Other financial corporations	86,773	15,692	23,962,485	3,586	24,068,536
Companies	7,852,968	5,820,432	47,933,226	803,040	62,409,666
Households	67,765,781	147,383	12,784,023	120,497	80,817,684
Mortgage loans	66,807,448	3,589	18,415	213	66,829,665
Consumer credit	-	3,998	5,535,481	8,304	5,547,783
Cards	-	-	889,746	-	889,746
Other	958,333	139,796	6,340,381	111,980	7,550,490
TOTAL	75,888,478	6,125,789	121,842,327	928,126	204,784,720

For the purposes of the above tables, the following explanations are provided:

- Transactions with mortgage guarantee: property mortgage, concession mortgage, chattel mortgage, shipping mortgage and aircraft mortgage.
- Other collateral: equity securities, fixed-income securities and other types of securities, government securities, term deposits and other account deposits, investment funds, bills of exchange, deposit certificates, covered bonds, etc.
- Personal guarantee: with guarantor or without guarantor, collateral and insurance policy.

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- Other guarantees: endorsement by a reciprocal guarantee association, CESCE credit insurance policy, bank guarantee and comfort letter.

From a legal viewpoint, a guarantee is a contract which provides greater security towards compliance with an obligation or payment of a debt in such a way that, in the event of default by the borrower, the guarantee reduces the losses arising from the transaction.

Guarantees must have legal certainty such that all contracts contain the conditions legally stipulated to make them fully valid, and so that they are duly documented in such a way as to establish a clear effective procedure to enable the guarantee to be enforced rapidly.

These are the principles inspiring the functional definition of the Corporate Guarantee System.

Guarantees and collateral provided in each transaction must be duly reported and measured in the system, and the Credit Risk Policy document details the main characteristics required of these measurements, both in terms of type of eligible appraisals and the frequency with which the appraisals must be updated.

Note 12 shows additional information on the guarantees received.

(3.1.8) Renegotiated financial assets

As part of its credit risk management procedures, the Group carried out renegotiations of assets, modifying the conditions originally agreed with borrowers in terms of repayment deadlines, interest rates, collateral given, etc.

Appendix X contains the classification and hedging policies and criteria applied by the Group in this type of transaction, along with the amount of refinancing operations, including details of their classification as non-performing exposures and the respective credit risk allowances.

(3.1.9) Assets impaired and derecognised

Details of the changes in 2020 and in 2019 in the Group's impaired financial assets that were not recognised on the consolidated balance sheet because their recovery was considered unlikely, although the Group has not discontinued actions to recover the amounts owed ("write-off assets"), are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Opening balance	2,388,659	1,831,595
Additions due to:		
Assets unlikely to be recovered	450,302	618,026
Uncollected past-due amounts	97,227	184,547
Sum	547,529	802,573
Derecognition due to:		
Cash collection	(8,444)	(39,200)
Forgiveness, foreclosure, sales and other causes	(199,914)	(206,296)
Sum	(208,358)	(245,496)
Net change due to exchange differences	(3,227)	(13)
Balance at the end of the period	2,724,603	2,388,659

(3.2) Liquidity risk of financial instruments

Liquidity risk can be expressed as the probability of incurring losses through insufficient liquid resources to comply with the agreed payment obligations (both expected and unexpected) within a certain time horizon and having considered the possibility of the Group managing to liquidate its assets in reasonable time and price conditions.

The Group strives to maintain a long-term financing structure that is in line with the liquidity of its assets; maturity profiles should be compatible with the generation of stable, recurring cash flows to enable the Group to manage its balance sheet without short-term liquidity pressures.

In practice, this principle results in the implementation of financing policies and strategies in the Entity which seek to minimise the scale of the financing timing gaps based on the risk profile associated with the business model. In this regard, the Group:

- Draws up an annual Financial Plan for both the short and medium term, which is evaluated as part of the liquidity adequacy self-assessment process, with protection of the balance sheet assets and liabilities and the main indicators of liquidity and financing risk, which takes into consideration the situation triggered by COVID-19 (see Note 1.16), assuring adequate liquidity from both an economic and regulatory standpoint.

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According to the retail business model underpinning the Group's banking activity, the main funding source is customer deposits, which have remained stable over the six-month period. The Group taps domestic and international capital markets, in particular repo markets, to raise financing so that it meets its additional liquidity needs, as well as the long-term financing provided by the ECB through the TLTRO programme. As a result of the outbreak of the COVID-19 pandemic, demand for credit has risen significantly. In order to support liquidity in the eurozone's financial system and contribute towards maintaining the proper functioning of monetary markets in the scenario affected by the COVID-19 pandemic, in April 2020 the European Central Bank amended some of the terms and conditions associated with the TLTRO III programme, reducing the interest rate by 0.5% with regard to the average rate for deposit facilities in the period from 24 June 2020 to 23 June 2021, whereby the interest rate on these facilities would be -1%. In order to be able to benefit from this reduction, the Group must meet certain financing objectives established by the European Central Bank, whereby the rate for eligible net loans and receivables for the period from 1 March 2020 to 31 March 2021 must be more than 0%. Based on what is set out above, the Group has increased its financing in these programmes to EUR 22,919 million (an additional EUR 9,168 million compared to the figure for the 2019 close). No debt has been issued and placed with third parties this year. This year no debt has been issued and placed with third parties. However, in July a EUR 900 million public-sector covered bond was issued, the full amount of which is held under treasury shares.

- The Group has a cushion of unencumbered, high-quality liquid assets (measured both in regulatory and internal terms). These assets have been perfectly identified and are available to treasury to be used as a source of contingent financing in the event of a stress scenario. The Entity has deposited certain assets as guarantees in the European Central Bank (ECB) that can be used to raise liquidity immediately. Ongoing monitoring of collateral enables the Group to identify those assets that are readily usable as liquidity reserves at times of market stress, differentiating between assets that are considered eligible by the ECB, or by clearing houses or other financial counterparties (e.g. insurance companies, investment funds).

The Entity avails of internal governance over liquidity risk comprising policies, procedures and systems that ensure a framework for managing and controlling liquidity risk that is robust and takes into account the complexity of the Entity and its business model.

The following table presents the bulk of the liquidity reserve estimated by the Group to confront internal and systemic stress events.

(in millions of euros)

ITEM	31/12/2020	31/12/2019
Cash (*)	10,115	11,418
Undrawn amount on the facility	5,883	6,161
Highly liquid available assets (**)	19,050	15,538

(*) Notes and coins plus balances at central banks less the amount of minimum reserves.

(**) Market value considering the ECB haircut.

Other assets have been identified which, although not considered to be highly liquid, can be converted at relatively short notice.

Regarding the structure of roles and responsibilities in relation to this risk, the Board of Directors is ultimately responsible for the liquidity risk assumed. It is the maximum authority for the risk appetite and tolerance level and for establishing a framework of policies and procedures to ensure a robust liquidity risk management and control framework.

To guarantee this good governance, an organisational structure based on the three lines of defence model has been designed. According to this model, senior executives, represented basically by the Management Committee and the ALCO, is charged with developing and applying the risk management strategy in accordance with the risk appetite statement and the risk policies and limits framework governing the Liquidity and Funding function. The ALCO takes decisions based on reports and proposals provided by various departments and, where appropriate, requests them through departments authorised to do so. The Deputy General Directorate of Finance carries out the related transactions in capital markets and sets transfer costs. In managing the business, the Deputy General Directorates of Retail Banking and Business Banking generate liquidity and funding risks, which is quantified through the commercial gap and LtD ratio.

The Board of Directors, assisted by the Risk Advisory Committee (RAC), oversees that the strategy is implemented and that the defined tolerance limits are not breached. The Global Risk Control and Oversight Committee (GRCOC) reinforces the governance bodies by controlling, overseeing and effectively challenging trends in the Entity's risk profile, the risk appetite approved by the Board of Directors and the business model.

The Corporate Risk Directorate, through the Financial Risk Control Directorate, which operates as an independent unit, monitors and analyses liquidity risk, among other responsibilities. It promotes the integration of these activities in management by developing metrics and methodologies to ensure that the risk remains within defined risk appetite tolerance levels. Lastly, the Markets and Structural Risks Audit Directorate, which operates as an independent unit, conducts audits of the various processes related to the function.

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The structure is rounded off with the creation of two specific bodies, the Contingent Liquidity Committee (CLC) and the Technical Liquidity Committee (TLC), geared towards managing risk under stress events. The CLC's objective is to respond to contingent liquidity events quickly and effectively. The TLC is an advisory body that meets at least monthly to assess both the Entity's and the overall market's liquidity and funding position, and to monitor early warning indicators related to the Liquidity Contingency Plan (LCP). Its conclusions and analyses are laid before the ALCO so that managers of the function are apprised of any problems or situations that in the Committee's opinion could potentially pose a threat to the Entity's liquidity.

Strategy

Five key indicators are currently used to define the strategy for this risk, covering a dual perspective: regulatory-economic and liquidity-funding risk. At 31 December 2020, the indicators were within the Entity's risk limits and regulatory requirements.

Liquidity risk:

- LCR: the strategy is defined from a regulatory viewpoint, related to a survival period using regulatory assumptions of 30 days. At 31 December 2020, the LCR (for Bankia on a standalone basis) stood at 195.22%.
- SLCR_{30d}: the liquidity strategy is defined from an economic viewpoint through additional metrics other than the regulatory LCR, taking stress scenarios that are expanded in two ways:
 - More survival horizons are built, which entails adapting the regulatory assumptions to these horizons, as well as envisaging and anticipating corrective measures to address future liquidity vulnerabilities.
 - Varying degrees of stress are created for each survival horizon. This approach allows the stressed LCR (SLCR) to be built and calculated at different horizons using more stringent assumptions than the regulatory assumptions, based on expert criteria, past experience or a combination of both.

The SLCR_{30d} is the result of the 30-day horizon of the hybrid crisis, for which an appetite and tolerance level are established. At 31 December 2020, the LCR was within the Entity's risk limits and regulatory requirements.

Funding risk:

- NSFR: through this indicator, the Entity draws up the funding strategy from a regulatory viewpoint. At 31 December 2020, the NSFR (for Bankia on a standalone basis) stood at 128.83%, which was within the Entity's risk limits and met the regulatory requirements. In accordance with the CRR2 a minimum of 100% will become a prudential requirement as of June 2021.
- Strict LtD: through this indicator, the Entity draws up the funding strategy from an economic viewpoint, setting the appetite for self-financing of the commercial balance sheet and limiting reliance on funding from capital markets.
- Asset Encumbrance Ratio (% AE): the objective of this indicator is to design a strategy on the desired level of encumbered assets that does not limit the capacity to raise contingent liquidity in stress scenarios or reduce investor appetite for our "unsecured funding" (i.e. without collateral) instruments that could undermine or increase the cost of achieving the MREL objectives.

Each year, under the scope of the ILAAP, a quantitative self-assessment is carried out with projections of RAF indicators to determine the capacity and viability of implementing the liquidity and funding strategy established in the financial planning process and to maintain this within the risk limits allocated in the risk appetite statement.

In addition to these indicators, the Entity has a set of metrics and indicators that complement the various aspects of liquidity and funding risk management, monitoring and control.

Maturities of issues

The following table provides information on the remaining term to maturity of the Group's issues at 31 December 2020 and 2019, by type of financial instrument, including promissory notes and issues placed via the network.

31 December 2020

(in thousands of euros)

ITEM	2021	2022	2023	> 2023
Mortgage bonds and covered bonds	2,025,000	3,235,185	1,825,000	8,426,123
Senior debt	35,000	30,000	-	2,569,720
Subordinated, preference and convertible securities	175,000	1,250,000	500,000	1,000,000
Securitisations sold to third parties	-	-	-	1,049,179
Total maturities of issues (*)	2,235,000	4,515,185	2,325,000	13,045,022

(*) Figures shown in nominal amounts, less treasury shares and issues withheld.

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31 December 2019

(in thousands of euros)				
ITEM	2020	2021	2022	> 2022
Mortgage bonds and covered bonds	417,917	2,025,000	3,235,185	10,280,323
Senior debt	2,331	35,000	30,000	2,570,032
Subordinated, preference and convertible securities	-	175,000	1,250,000	1,500,000
Securitisations sold to third parties	-	-	-	1,369,538
Total maturities of issues (*)	420,248	2,235,000	4,515,185	15,719,893

(*) Figures shown in nominal amounts, less treasury shares and issues withheld.

Issuance capacity

(in thousands of euros)		
ITEM	31/12/20	31/12/2019
Covered bonds issuance capacity (Appendix VIII)	18,569,186	18,873,244
Public-sector covered bonds issuance capacity	699,826	1,175,730

(3.3) Residual maturities

The following table provides a breakdown of balances of certain items on the accompanying consolidated balance sheet, by residual contractual maturity, excluding, as appropriate, valuation adjustments and impairment losses:

31 December 2020

(in thousands of euros)							
ITEM	On demand	Up to 1 month	1 to 3 months	3 months to 1 year	1 to 5 years	More than 5 years	Total
Assets							
Cash, cash balances at central banks and other demand deposits	11,808,227	-	-	-	-	-	11,808,227
Loans and advances – Credit institutions	-	2,708,720	534,456	1,174,190	503,340	-	4,920,706
Loans and advances – Customers	-	3,563,493	5,865,823	13,284,201	46,673,641	51,321,321	120,708,479
Financial assets held for trading – Debt securities	-	1,573	-	-	-	79,174	80,747
Other portfolios – Debt securities	-	82,144	4,111,478	9,336,905	17,824,259	14,717,290	46,072,076
Derivatives (trading and hedging) (1)	-	317,415	415,263	1,410,913	6,780,202	8,701,684	17,625,477
Total	11,808,227	6,673,345	10,927,020	25,206,209	71,781,442	74,819,469	201,215,712
Liabilities							
Deposits – Central banks and credit institutions	-	1,114,119	652,620	1,831,470	31,509,012	2,761,429	37,868,650
Deposits – Customers	98,826,404	4,710,027	4,022,493	13,571,997	3,533,693	2,697,300	127,361,914
Debt securities issued	-	962,349	125,304	565,961	7,506,671	8,113,081	17,273,366
Other financial liabilities (2)	1,946,300	-	-	-	-	-	1,946,300
Derivatives (trading and hedging) (1)	-	238,653	314,853	1,418,002	6,312,824	7,043,387	15,327,719
Total	100,772,704	7,025,148	5,115,270	17,387,430	48,862,200	20,615,197	199,777,949

(1) Gross exposure excluding netting arrangements (see Notes 3.1.6, 9 and 13).

(2) Excludes balances of contracts for property, plant and equipment acquired under lease, the expiry dates of which are disclosed in Note 19; the remainder corresponds to a residual line item comprising items that are generally transitory or do not have a contractual maturity date, thus it is not possible to reliably allocate the amounts recognised by term of maturity, and therefore they are classified under on-demand liabilities.

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31 December 2019

(in thousands of euros)

ITEM	On demand	Up to 1 month	1 to 3 months	3 months to 1 year	1 to 5 years	More than 5 years	Total
Assets							
Cash, cash balances at central banks and other demand deposits	13,202,885	-	-	-	-	-	13,202,885
Loans and advances – Credit institutions	-	3,191,937	32,075	2,041,431	205,896	-	5,471,339
Loans and advances – Customers	-	3,970,877	6,396,611	13,294,227	38,986,972	54,552,508	117,201,195
Financial assets held for trading – Debt securities	-	329	-	-	-	170,703	171,032
Other portfolios – Debt securities	-	861,702	1,981,497	14,719,729	12,618,070	14,803,176	44,984,174
Derivatives (trading and hedging) (1)	-	265,557	411,762	1,371,477	6,106,962	7,623,858	15,779,616
Total	13,202,885	8,290,402	8,821,945	31,426,864	57,917,900	77,150,245	196,810,241
Liabilities							
Deposits – Central banks and credit institutions	-	13,142,365	114,848	11,754,708	12,929,245	2,462,684	40,403,850
Deposits – Customers	86,194,112	5,094,945	6,181,150	17,360,682	4,199,865	4,593,824	123,624,578
Debt securities issued	-	-	-	2,331	5,180,333	12,443,527	17,626,191
Other financial liabilities (2)	930,568	-	-	-	-	-	930,568
Derivatives (trading and hedging) (1)	-	153,464	369,260	1,320,495	5,533,129	5,952,002	13,328,350
Total	87,124,680	18,390,774	6,665,258	30,438,216	27,842,572	25,452,037	195,913,537

(1) Gross exposure excluding netting arrangements (see Notes 3.1.6, 9 and 13).

(2) Excludes balances of contracts for property, plant and equipment acquired under lease, the expiry dates of which are disclosed in Note 19; the remainder corresponds to a residual line item comprising items that are generally transitory or do not have a contractual maturity date, thus it is not possible to reliably allocate the amounts recognised by term of maturity, and therefore they are classified under on-demand liabilities.

(3.4) Exposure to interest rate risk

Interest rate risk reflects the probability of incurring losses because of changes in the benchmark interest rates for asset and liability positions (or certain off-balance sheet items) that could have an impact on the stability of the Group's results. Interest rate risk management is designed to provide stability to net interest income, maintaining levels of solvency that are appropriate for the Group's level of risk tolerance.

Interest rate risk monitoring and management at the Group is performed in accordance with the criteria approved by the governing bodies.

Each month, information on structural balance sheet risk is reported to the ALCO in terms of both economic value (sensitivities to different scenarios and VaR) and net interest income (net interest income projections in different interest-rate scenarios for horizons of 1 and 3 years). At least quarterly, the Board of Directors is informed through the Risk Advisory Committee on the situation and monitoring of limits. Any excesses are reported immediately to the Board. In addition, information prepared by the ALCO is reported by the Corporate Risk Directorate, along with other risks, to the Entity's senior executives.

According to Bank of Spain regulations, the sensitivity of net interest income and equity value to parallel shifts in interest rates (currently ± 200 bps) is controlled. In addition, different sensitivity scenarios (EBA scenarios) are established based on implied market interest rates, comparing them to non-parallel shifts in yield curves that alter the slope of the various references of balance sheet items.

Sensitivity analyses performed by analysing interest rate risk scenarios from both perspectives provide the following information:

- Impact on profit or loss. At 31 December 2020, the sensitivity of net interest income, excluding the trading portfolio and financial activity not denominated in euros, in the most adverse scenario of a 200 bp parallel downward shift in yield curve over a one-year time horizon in a scenario of a stable balance sheet, would be -7.87%, of which -1.35% corresponds to the baseline risk (-9.68% at 31 December 2019, with -1.47% accounting for the baseline risk). In a level playing field, the sensitivity of net interest income to the scenario of a parallel upward shift in rates of 200 bp is 21.67%, of which -4.82% corresponds to the baseline risk (13.15% at 31 December 2019, with -4.68% accounting for the baseline risk).
- Impact on economic value of equity, understood as the present value of estimated cash flows from different assets and liabilities. At 31 December 2020, the sensitivity of economic value, excluding the trading portfolio and financial activity not denominated in euros, facing the most adverse scenario of a parallel downward shift in the yield curve of 200 bp is 0.74% of total equity and -0.53% of economic value of the Group (-3.18% and -2.30%, respectively, at 31 December 2019). In a level playing field, the sensitivity of economic value to a scenario of a parallel upward shift in rates of 200 bp is 14.29% of total equity and 10.10% of economic value of the Group (10.94% and 7.95%, respectively, at 31 December 2019).

The sensitivity analysis was performed using static assumptions. Specifically, this means maintaining the balance sheet structure and applying new spreads with the Euribor interest rate for the same term to maturing transactions. Irregular deposits are presumed to be refinanced at a higher cost.

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(3.5) Exposure to other market risks

This risk arises from the possibility of incurring losses on positions in financial assets caused by changes in market risk factors (interest rates, equity prices, foreign exchange rates or credit spreads). It stems from Treasury and Capital Markets positions and can be managed by arranging other financial instruments.

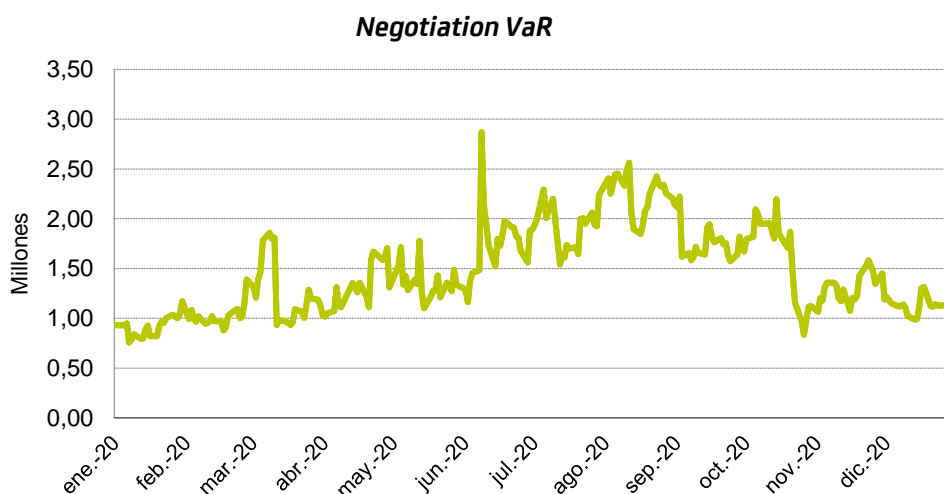
The Board of Directors delegates proprietary trading in financial markets to the Deputy General Directorate of Finance and its business areas, so that they can exploit business opportunities using the most appropriate financial instruments at any given time, including interest rate, exchange rate and equity derivatives. In general, the financial instruments traded must be sufficiently liquid and entail hedging instruments.

Each year, the Board of Directors approves the risk limits and internal risk measurement procedures for each product and market in which the various trading areas operate. The Market and Operational Risks Directorate, which reports to the Corporate Risk Directorate, has the function of measuring independently, monitoring and controlling the Entity's market risk and the limits stipulated by the Board of Directors. VaR (value at risk) and sensitivity analysis approaches are used for each type of risk (1 bp in absolute terms or 1% in relative terms, in the underlying risk factor).

Market risks are monitored daily, with existing risk levels and compliance with the limits established for each unit reported to the control bodies. In this way, variations in risk levels caused by changes in prices of financial products and their volatility can be detected.

The reliability of the VaR approach used is confirmed through backtesting, verifying that the VaR estimates are within the confidence level considered. Backtesting is extended to measure the effectiveness of the hedging derivatives. In 2020, there were no changes in the methods used to make the estimates included in these consolidated financial statements from those used the preceding year.

The following chart shows the trend in one day VaR with a 99% confidence level for operations in the markets area in trading activities in 2020.



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The impact on equity and on the accompanying consolidated income statement of reasonable future changes in the various market risk factors at 31 December 2020 and 2019, calculated on the basis of the Group's fair value portfolio (thus excluding the portfolio of financial assets at amortised cost), is as follows:

(in thousands of euros)

MARKET RISK FACTORS	Accumulated other comprehensive income (1)		Income statement (1)	
	2020	2019	2020	2019
Interest rate	(68,030)	(10,672)	(14)	32
Equity instruments	-	-	(3)	(26)
Exchange rate	-	-	84	95
Credit spread	(212,205)	(329,349)	14	3

(1) Amounts shown net of the related tax effect.

In addition, at 31 December 2020 there was a structural portfolio consisting of debt securities designed to provide stability to net interest income. The nominal amount of this portfolio at 31 December 2020 is EUR 44,936,813 thousand (EUR 42,729,620 thousand at 31 December 2019). The following table shows the sensitivity analysis, indicating the portfolio in which the component debt securities are classified and the related risks:

(in millions of euros)

	31/12/20			31/12/2019		
	Interest rate risk	Credit risk (spreads)	Total	Interest rate risk	Credit risk (spreads)	Total
Non-trading financial assets mandatorily at fair value through profit or loss	-	-	-	-	-	-
Financial assets at fair value through other comprehensive income	(68)	(212)	(280)	(11)	(329)	(340)
Financial assets at amortised cost	-	(745)	(745)	-	(520)	(520)
Total	(68)	(957)	(1,025)	(11)	(849)	(860)

As regards the sensitivities in the preceding table:

- For debt securities classified as financial assets at fair value through other comprehensive income, the impact would have a balancing entry in "Accumulated other comprehensive income" in consolidated equity.
- For debt securities classified as financial assets at amortised cost, although the sensitivity shows the theoretical impact of credit risk (default) that would require the recognition of higher credit loss allowances (impairment losses) than those presented in the accompanying consolidated financial statements, this is highly unlikely given the portfolio's composition; i.e. mainly debt securities issued directly or guaranteed by the government.

At 31 December 2020 and 2019, the Bankia Group's net exposure to currency risk is not significant.

(4) Capital management

(4.1) Legislation

On 26 June 2013, Regulation 575/2013 of the European Parliament and of the Council on prudential requirements for credit institutions and investment firms (the "CRR"), and Directive 2013/36/EU on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms (the "CRD IV") were approved, repealing regulations on solvency in force until then. They came into effect on 1 January 2014.

The CRR and CRD IV regulate capital requirements in the European Union and include the recommendations set out in the Basel III capital regulatory framework or agreement, specifically:

- The CRR, which is directly applicable to Member States, contains prudential requirements for credit institutions and covers, inter alia, the following:
 - The definition of elements of eligible own funds, establishing requirements for hybrid instruments to be included and limiting the eligibility of minority interests.

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- The definition of prudential filters and deductions of items in each capital tier. In this respect, the Regulation includes new deductions compared to Basel II (deferred tax assets, pension funds, etc.) and introduces changes to existing deductions. Nevertheless, it establishes a phase-in schedule of between 5 and 10 years for full implementation.
- Establishment of minimum requirements (Pillar I), with three levels of own funds: a Common Equity Tier 1 capital ratio of 4.5%, a Tier 1 capital ratio of 6% and a minimum requirement total capital ratio of 8%.
- Requirement of financial institutions to calculate a leverage ratio, defined as Tier 1 capital divided by total exposure unadjusted for risk. The disclosure requirement is applicable from 2015 onwards.
- The aim and main purpose of the CRD IV, which must be transposed into national legislation by the Member States according to their criteria, is to coordinate national legislation regarding access to the activity of credit institutions and investment firms and their governance and supervisory framework. The CRD IV includes, inter alia, additional capital requirements to those established in the CRR, which will be phased in gradually until 2019. Failure to comply will imply restrictions on the discretionary distributions of profit, specifically:
 - A capital conservation buffer and a countercyclical capital buffer. Following on from the Basel III regulatory framework, and to mitigate pro-cyclical effects of financial regulation, all financial institutions are required to maintain a capital conservation buffer of 2.5% of Common Equity Tier 1 capital and an institution-specific countercyclical capital buffer based on Common Equity Tier 1 capital.
 - A systemic risk buffer. For global systemically important institutions and other systemically important institutions to mitigate systemic or macroprudential risks; i.e. risks of disruptions in the financial system with the potential to have serious negative consequences for the financial system and the real economy in a specific Member State.
 - In addition, Article 104 of the CRD IV, Article 68 of Law 10/2014, of 26 June 2014, on the organisation, supervision and solvency of credit institutions, and Article 16 of Council Regulation (EU) No 1024/2013, of 15 October 2013, confer specific tasks on the European Central Bank concerning policies relating to the prudential supervision of credit institutions (Single Supervisory Mechanism or SSM). This regulation allows supervisory authorities to impose additional capital requirements to the Pillar I minimum capital requirements for risks not covered therein; known as Pillar II capital requirements.

Since their entry into force, the CRR and CRD IV have been amended several times to address shortcomings in the prudential regulatory framework and to incorporate certain elements pending the reform of financial services worldwide, which are crucial to ensuring the resilience of institutions. These amendments include:

- Regulation (EU) 2017/2395 of the European Parliament and of the Council of 12 December 2017, amending the CRR as regards transitional arrangements for mitigating the impact of the introduction of IFRS 9 on own funds and for the large exposures treatment of certain public sector exposures.
- Regulation (EU) 2019/876 of the European Parliament and of the Council, of 20 May 2019, and Regulation (EU) 2019/877 of the European Parliament and of the Council, of 20 May 2019, amending the CRR and forming part of the legislative package known as “CRR II”. Amendment to the CRR as regards the leverage ratio (setting a minimum requirement of 3% for all institutions), the requirements for own funds and eligible liabilities (MREL), the capital requirement for counterparty credit risk and market risk, the treatment of exposures to central counterparties, exposures to collective investment undertakings, large exposures, report and disclosure requirements and amending Regulation (EU) No 648/2012. An amendment was also made to Regulation (EU) 806/2014 of the European Parliament and of the Council (the “SRM Regulation”) in respect of the loss-absorption and recapitalisation capacity of credit institutions and investment firms. Entry into force on 27 June 2019, with a phase-in timetable of up to 2 years for certain modifications.
- Directive (EU) 2019/878 of the European Parliament and of the Council, of 20 May 2019, and Directive (EU) 2019/879 of the European Parliament and of the Council, of 20 May 2019, amending the CRD IV and forming part of the legislative package known as “CRD V”. Amendment to the CDR IV as regards exempted entities, financial holding companies, mixed financial holding companies, remuneration, supervisory measures and powers and capital conservation measures. Entry into force on 27 June 2019.
- Regulation (EU) 2020/873 of the European Parliament and of the Council of 24 June 2020 amending the CRR and CRR II as regards certain adjustments in response to the COVID-19 pandemic, notably:
 - The date of application of some of the more favourable treatments introduced by the CRR II is brought forward: prudential treatment of certain software assets, the treatment of certain loans backed by pensions or salaries, application of a revised supporting factor for loans to small and medium-sized enterprises (SMEs) (the “SME supporting factor”), and a new adjustment to own funds requirements for credit risk for exposures to entities that operate or finance physical structures or facilities, systems and networks that provide or support essential public services (the “infrastructure supporting factor”).
 - The date of application for the leverage ratio buffer requirement for global systemically important institutions is deferred to 1 January 2023 and the possibility is established of excluding certain exposures to central banks from the calculation of the exposure measure laid down in article 429 of the CRR.

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- More flexibility is permitted in the application of Regulation (EU) No 2017/2395 of the European Parliament and of the Council of 12 December 2017 as regards transitional arrangements for mitigating the impact of IFRS 9, in order to limit the possible volatility of regulatory capital that might occur if the COVID-19 pandemic results in a significant increase in expected credit loss provisions. Institutions are allowed to add back to their Common Equity Tier 1 capital any increase in new expected credit loss provisions for unimpaired credit exposures (Stage 1 – Performing exposures and Stage 2 – Performing exposures under special monitoring) that they recognise in 2020 and 2021.
- A temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income is established, permitting the exclusion of 100% of the accumulated amount of such unrealised gains and losses arising since 31 December 2019 from the calculation of Common Equity Tier 1 in 2020 and applying a transitional timetable until their full inclusion in 2023.
- Additional flexibility is allowed for competent authorities to mitigate the effects of market volatility in 2020 and 2021 on the internal calculation models for own funds requirements in relation to market risk.

Regarding Spanish regulations, the legislation is aimed at transposing European rules at local level:

- Bank of Spain Circular 2/2014 of 31 January 2014, to credit institutions, on the exercise of various regulatory options contained in Regulation (EU) No 575/2013. The purpose is to establish, in accordance with the powers granted, which options of those contained in the CRR attributed to national competent authorities will be mandatory for consolidated groups of credit institutions, and for credit institutions whether or not they are part of a consolidated group, as of 1 January 2014 and to what extent. In this Circular, the Bank of Spain makes use of some of the permanent regulatory options included in the CRR, to allow the treatment that Spanish law had been giving to certain questions before the entry into force of the EU regulation to be continued, justifying this by the business model that Spanish institutions have traditionally followed. This does not preclude the future exercise of other options provided for in the CRR for competent authorities in many cases, mainly as regards specific options applied directly under the CRR without the requirement to be included in a Bank of Spain circular.
- Law 10/2014, of 26 June, on the organisation, supervision and solvency of credit institutions, the aim of which is to continue the transposition of the CRD IV initiated by Royal Decree-Law 14/2013, of 29 November, and recast certain national provisions in place at the time regarding the organisation and discipline of credit institutions. This law introduces, inter alia, an express obligation for the first time on the part of the Bank of Spain to present an annual Supervisory Programme setting out the content and how it will perform its supervisory activity, together with the actions to be taken in accordance with the outcome. This programme must include a stress test at least once a year.
- Bank of Spain Circular 3/2014, of 30 July. Among other measures, this Circular amends Circular 2/2014 of 31 January on the exercise of various regulatory options contained in Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms, in order to unify the treatment of the deductions of intangible assets during the transitional period set out in Regulation (EU) No 575/2013, equating the treatment of goodwill to that of all other intangible assets.
- Royal Decree-Law 84/2015, of 13 February, implementing Law 10/2014, of 26 June, on the organisation and supervision of credit institutions.
- Bank of Spain Circular 2/2016, of 2 February. This Circular completes the transposition of Directive 2013/36/EU and includes additional regulatory options for the national competent authorities to those included in Circular 2/2014 and developed in Royal Decree-Law 84/2015. Specifically, and subject to prior authorisation by the Bank of Spain, it includes the possibility of treating certain exposures through public sector entities with the same tier weightings as the Administrations to which they belong.
- Bank of Spain Circular 3/2017, of 24 October, amending certain aspects of Circular 2/2014, of 31 January. Its scope of application has been limited to the less significant institutions, the contents of the Circular have been fine-tuned to reflect the guidelines issued by the European Central Bank (ECB) and it eliminates the rules regarding the transitional arrangements that were in effect until 2017.
- Royal Decree-Law 22/2018, of 14 December, establishing macroprudential tools and limits on sectoral concentration, along with conditions on the granting of loans and other exposures. In this respect, the Bank of Spain may require application of a countercyclical capital buffer for all of an institution's exposures or for exposures in a specific sector.

In addition, in 2016 the European Central Bank published Regulation (EU) 2016/445, of 14 March 2016. With this regulation, the European Central Bank aims to further harmonise legislation applicable to credit institutions under its direct supervision (significant credit institutions) and establish a level playing field for credit institutions. This regulation became effective on 1 October 2016, supplementing the options and discretions conferred on the national competent authorities.

(4.2) Capital requirements

In February 2019, the European Central Bank notified the Bankia Group of the capital requirements applicable to it in 2019: a minimum Common Equity Tier 1 ratio of 9.25% and a minimum Total Capital ratio of 12.75%, both measured in relation to its transitional (phase-in) regulatory capital. These thresholds include the minimum required under Pillar I (4.5% in terms of Common

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Equity Tier 1 capital and 8% at the Total Capital level), as well as the Pillar II requirement (2%) and the combined buffer requirement applicable to the Group.

In December 2019, the European Central Bank notified the Bankia Group of the capital requirements applicable to it in 2020: maintaining a minimum Common Equity Tier 1 ratio of 9.25% and a minimum Total Capital ratio of 12.75%, both measured in relation to its transitional (phase-in) regulatory capital. These thresholds include the minimum required under Pillar I (4.5% in terms of Common Equity Tier 1 capital and 8% at the Total Capital level), as well as the Pillar II requirement (2%) and the combined buffer requirement applicable to the Group (2.75%).

The combined buffer requirements applicable for 2019 and 2020 are 2.75% (2.5% for the capital conservation buffer and 0.25% for the "other systemically important institutions" (O-SIIs) buffer). As the Bank of Spain has identified the Bankia Group as being among the "other systemically important institutions" (O-SIIs), a Common Equity Tier 1 capital buffer was established at 0.25% of its total risk exposure on a consolidated basis. Finally, the Group's own countercyclical capital buffer, calculated based on the geographical location of its exposures, is 0%. This is because the Group's exposures are located in countries (mainly Spain) whose supervisors have established the buffer at 0% for exposures in their territories.

On 12 March 2020 the ECB published a raft of measures to firm up the resilience of institutions in the current climate in response to the COVID-19 pandemic, allowing institutions to temporarily operate below the minimum requirements of Pillar II Guidance and the capital conservation buffer. Moreover, the entry into force of article 104 a) of the CRD V was brought forward, allowing institutions to cover the minimum requirements of the Pillar II Requirement not only with Common Equity Tier 1 capital, but also with Additional Tier 1 capital and Tier 2 capital. Following the application of article 104 a), the Bankia Group's minimum CET1 requirement is 8.375% and the minimum Total Capital requirement remains 12.75%.

In light of the current climate caused by the COVID-19 crisis, and following the supervisor's recommendations, on 17 July 2020 Bankia Group asked to avail of the option to phase in the initial impact on own funds of the implementation of IFRS 9 provided for in Regulation (EU) 2017/2395 of the European Parliament and of the Council, of 12 December 2017, even though it made no such request on 1 January 2018, having received authorisation from the supervisor in August. Likewise, the Group has communicated its decision to apply the transitional provisions of Regulation (EU) 2020/873 of the European Parliament and of the Council, of 24 June 2020, amending article 473 bis of the CRR and allowing institutions to add back to their Common Equity Tier 1 capital any increase in new expected credit loss provisions for unimpaired credit exposures that they recognise in 2020 and 2021.

In addition, on 17 July 2020 the Bankia Group informed the supervisor of its decision to avail of the option provided for in Regulation (EU) 2020/873 of the European Parliament and of the Council, of 24 June 2020, in respect of the amendment to article 468 of the CRR, which allows for a temporary treatment to be applied to unrealised gains and losses arising since 31 December 2019 on portfolios of debt instruments measured at fair value, corresponding to exposures to central governments, regional governments or local authorities, permitting their exclusion from Common Equity Tier 1 capital.

The Group applies the following to its minimum capital requirements:

- For credit risk requirements:
 - For exposures relating to retail customers and companies:
 - Both advanced internal-ratings based (IRB) models approved by the Bank of Spain and the standardised approach depending on the origin of the portfolio.
 - Advanced internal models for all new business.
 - For exposures to institutions, both advanced internal-ratings based (IRB) models and the standardised approach.
- The standardised approach for all other exposures.
- Requirements linked to the held-for-trading portfolio (foreign currency and market rates) were calculated using internal models, including additional counterparty credit risk requirements for OTC derivatives (CVA, "credit value adjustment"). The calculation model for market risk was under review. Therefore, until the model was finally approved in November 2020, the risk-weighted assets (RWA) included an increase for market risk related to the calculation method and not to market activity.
- For the portfolio of equity securities, it used the simple risk-weight approach, the PD/LGD method and the standardised approach, depending on the origin of the various sub-portfolios.
- To calculate the capital requirements for operational risk, the standardised approach was used.

As for the calculation of the Group's capital requirements using internal models, the ECB's Supervisory Board has initiated a Targeted Review of Internal Models (TRIM) with the aim of standardising current differences across institutions in the risk weightings they apply to their exposures that are not attributable to their risk profiles but rather stem from their calculation models, all framed within a standardised supervisory model. This review takes in around 70 European financial institutions, including the Bankia Group.

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The following table provides details of the Bankia Group's capital tiers at 31 December 2020 and 2019 as well as the RWA (risk-weighted assets) calculated in accordance with applicable legislation:

(Thousands of euros and %)		
ITEM	31/12/2020 (*)	31/12/2019
Common Equity Tier 1 (CET 1)	11,639,587	11,120,019
Capital	3,069,522	3,069,522
Share premium	619,154	619,154
Eligible profit or loss attributable to owners of the parent	229,803	541,436
Reserves and treasury shares	9,422,313	8,899,497
Eligible accumulated other comprehensive income	91,379	153,953
Eligible minority interests	-	-
Deductions	(1,792,584)	(2,163,543)
Deferred tax assets that depend on future income	(1,321,209)	(1,089,172)
Valuation adjustments due to prudent requirements (AVA)	(22,431)	(38,442)
Dividend to be deducted for regulatory purposes	-	(355,328)
Intangible assets and other deductions	(448,944)	(680,601)
Additional Tier 1 capital (AT1)	1,250,000	1,250,000
Tier 1 capital (TIER1=CET1+AT1)	12,889,587	12,370,019
Tier 2 capital (TIER2)	1,915,092	1,672,270
Subordinated debt	1,672,270	1,672,270
Other eligible/deductible items	242,822	-
Total capital (TIER1+TIER2)	14,804,679	14,042,289
Total risk-weighted assets	67,265,254	77,634,917
Credit risk, counterparty risk and dilution risk	61,185,266	70,990,148
Standardised approach	19,865,567	27,657,492
Internal ratings-based approach	41,319,699	43,332,656
Market risk	689,688	1,080,319
Operational risk	5,390,300	5,564,450
Common Equity Tier 1 ratio	17.30%	14.32%
Tier 1 capital ratio	19.16%	15.93%
Total capital ratio	22.01%	18.09%

(*) Estimated data

At 31 December 2020, the Bankia Group shows a surplus of EUR 6,006 million (EUR 3,939 million at 31 December 2019) over the regulatory minimum Common Equity Tier 1 capital of 8.375% (9.25% at 31 December 2019) established considering Pillar I, the Pillar II requirement and the combined buffer requirement.

At the same date, the Bankia Group shows a surplus of EUR 6,228 million (EUR 4,144 million at 31 December 2019) over the regulatory minimum Common Equity Tier 1 capital of 12.750%, (12.750% at 31 December 2019) established considering Pillar I, the Pillar II requirement and the combined buffer requirement.

(4.3) Leverage ratio

The leverage ratio was designed by the Basel Committee on Banking Supervision in its Capital Accord of December 2010 as a supplementary measure to the Pillar I capital requirements. The entry into force of the CRR imposed on institutions the obligation to calculate and report the ratio to the Supervisor quarterly from January 2014, and to publicly disclose the ratio from 1 January 2015. On 10 October 2014, Commission Delegated Regulation (EU) No 2015/62 was approved. It became effective from 1 January 2015 and replaced the CRR with respect to calculating the leverage ratio.

The CRR did not initially require a minimum ratio to be met, and only from January 2014 was an indicative reference value of 3% of Tier 1 capital established by the Basel Committee on Banking Supervision. With the entry into force of CRR II on 27 June 2019, a binding leverage ratio requirement of 3% of Tier 1 capital was ultimately established, applicable from June 2021 onwards, in line with the reference value established by the Basel Committee on Banking Supervision in 2014.

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As regards the leverage ratio, Regulation (EU) 2020/873 of the European Parliament and of the Council, amending the CRR and CRR II, regarding certain adjustments made in response to the COVID-19 pandemic, inter alia, sets out the possibility of temporarily excluding certain exposures to central banks from the leverage exposure in advance of its entry into force, and calculating counterparty risk exposure in repurchase transactions using the new calculation provided for in the CRR II, as it better reflects the leverage in the transaction.

The leverage ratio is calculated as the Group's Tier 1 capital divided by its total exposure. For these purposes, total exposure is the sum of the exposure values of assets on the balance sheet, derivatives (with different treatment to the rest of the assets on the balance sheet), part of off-balance sheet items and counterparty risk in repurchase transactions, securities or commodities lending or borrowing transactions, long settlement transactions and margin lending transactions.

Since September 2020, the Bankia Group has availed of the option set out in Regulation (EU) 2020/873 of the European Parliament and of the Council of 24 June 2020 with regard to the temporary exclusion of exposure to the effects of the leverage ratio of certain exposures to central banks.

The Bankia Group's leverage ratio at 31 December 2020 and 31 December 2019 calculated in accordance with Commission Delegated Regulation (EU) No 2015/62 is as follows:

(Thousands of euros and %)		
ITEM	31/12/2020 (*)	31/12/2019
Tier 1 capital	12,889,587	12,370,019
Exposure	203,971,300	210,098,403
Leverage ratio	6.32%	5.89%
(+) Exposure on balance sheet	186,206,343	195,719,816
(+) Exposure on derivatives	1,756,197	2,605,920
(+) Additions in counterparty risk in securities financing transactions (SFTs)	4,592,315	3,475,213
(+) Off-balance sheet exposures (includes use of CCFs)	11,416,445	8,297,454
Total leverage ratio exposure	203,971,300	210,098,403

(*) Estimated data

At 31 December 2020 and 2019, the leverage ratio exceeded the aforementioned minimum required.

(4.4) Minimum requirement for own funds and eligible liabilities (MREL)

Directive 2014/59/EU of the European Parliament and of the Council establishing a framework for the recovery and resolution of credit institutions and investment firms (Bank Recovery and Resolution Directive or BRRD) was approved in May 2014 and came into effect in January 2015. It was transposed into Spanish legislation through Law 11/2015 on the Resolution and Recovery of Credit Institutions, of 18 June. This legislation determines in what circumstances the resolution scheme of a financial institution enters into force, designing an internal mechanism where shareholders and creditors absorb losses (bail-in) in order to protect deposits, minimise the costs for taxpayers and avoid as far as possible recourse to the Single Resolution Fund (SRF).

Regarding the mechanism for internal loss-absorption, a minimum requirement for own funds and eligible liabilities with loss-absorbing capacity called MREL (Minimum Required Eligible Liabilities) has been established, whereby institutions that are subject to the requirement must have liabilities with certain characteristics that favour the absorption of losses in the event of resolution of the institution.

On 23 June 2017, on the Spanish legislative front, Royal Decree-Law 11/2017 on urgent measures in financial matters was enacted. Among other things, the legislation created a new category of non-preferred senior debt, with a lower ranking relative to other preferred claims or ordinary senior debt, and established the requirements for classification in this category to guarantee loss-absorption capacity in the event of resolution. Enactment of this Royal Decree gives non-preferred ordinary claims a legal status, in line with other EU Member States and the regulatory proposals being put forward in Europe in this respect.

The Group is currently reporting its MREL levels to the Group's resolution authorities, the Single Resolution Board, FROB, and the Bank of Spain in terms of resolution, in accordance with the BRRD definition, as the ratio of the amount of own funds and eligible liabilities with respect to the Entity's total liabilities and own funds (TLOF) and, in addition, indicating its level in percentage terms by dividing the numerator by the Group's RWAs.

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On 20 November 2018 the SRB published its annual policy paper on the MREL, which serves as a basis for setting the MREL for banks not considered “complex” (subject to resolution colleges) and that, therefore, did not have binding targets in 2018, including the Bankia Group. On 16 May 2019, the Entity received formal notification from the Bank of Spain on the decision taken by the Single Resolution Board on its minimum requirement for own funds and eligible liabilities (MREL). According to this communication, from 1 July 2021 the Group would have to reach a minimum volume of own funds and eligible liabilities of 23.66% in terms of risk-weighted assets calculated at the end of the 2017 financial year. This MREL, expressed in terms of total liabilities and own funds of the entity (TLOF), would be 10.02%. Thus, as of 31 December 2020, the Group's estimated MREL ratio, calculated according to the current eligibility criteria of the Single Resolution Board, would amount to 25.87% of the total Risk-Weighted Assets (21.92% at 31 December 2019).

As mentioned above, the EU Banking Reforms package includes, inter alia, the reform of Directive 2014/59/EU of the European Parliament and of the Council of 15 May 2014, which came into force on 27 June 2019. These reforms introduce amendments to the BRRD, inter alia, in relation to the minimum subordination requirements of eligible MREL liabilities and the MDA (maximum distributable amounts) set in terms of MREL. In this regard, on 25 June 2019, the SRB published an Addendum to its MREL Policy Paper of January 2019, with the aim of clarifying the relationship between the new regulatory package and its MREL methodology. In May 2020 the SRB published its annual policy paper on MREL on the basis of the new regulatory framework approved with the 2019 package of banking reforms, which brought bank resolution and restructuring regulation into line with prevailing supervision legislation.

As a result of the COVID-19 crisis, and in relation to the MREL, the SRB published its view that compliance with current MREL restrictions in the short term should not prevent banks from extending financing to companies and the real economy. In this respect, on 20 May 2020 the Single Resolution Board published its definitive “Policy on the minimum requirements for own funds and eligible liabilities (MREL)”, setting out two binding MREL targets, including those regarding subordination: a binding intermediate target to be met on 1 January 2022 and the fully calibrated MREL (final target) to be met on 1 January 2024, easing the prevailing targets set in the 2018 and 2019 cycles.

(4.5) Transparency Exercises 2020

During 2020, the European Banking Authority (EBA) undertook two new transparency exercises in coordination with the national competent authorities and the European Central Bank. The goal of these exercises is to boost transparency and familiarity with the capital adequacy and solvency of European banks, thereby contributing to market discipline (Pillar 3) and financial stability in the European Union.

Due to the emergence of COVID-19 in 2020 and the adoption of extraordinary measures to support the economy by governments and regulators, the EBA has considered it necessary to publish two transparency exercises this year with the aim of illustrating the impact of the pandemic on the different institutions. For this purpose, the information published on exposures originating due to COVID-19 has been enhanced: moratoriums and financing secured by the ICO.

On 8 June 2020 the European Banking Authority (EBA) published the results of its seventh EU-wide transparency exercise, covering a total of 127 institutions across 27 countries, with consolidated data at 30 September 2019 and 31 December 2019. The information published relates to the banks' capital positions, risk-weighted assets, asset quality (non-performing exposures), profitability, as well as sovereign exposures at the 2019 close. The ratios published in the exercise for Bankia are for the BFA Group, Bankia's parent. From a capital ratio perspective, BFA Group's phase-in Common Equity Tier 1 capital ratio stood at 14.2% at the end of 2019, rising from 14.0% at September 2019. Comparable ratios for the average of banks participating in the exercise stood at 15.1% in December 2019 and 14.6% in September 2019.

On 11 December 2020, the EBA published the results of its 2020 EU-wide transparency exercise, for a sample of 129 banks across the 26 EU countries with consolidated data at 31 March 2020 and 30 June 2020. As on prior occasions, the information published relates to the banks' capital positions, risk-weighted assets, asset quality (non-performing exposures), profitability, sovereign exposures, and credit and market risk exposures, all from the perspective of supervisor reporting. This exercise is completed with the RAR (risk assessment report) based on a wider sample of banks (147 EU institutions with consolidated data). In the context of the COVID-19 pandemic, the transparency exercise included information on public and private moratorium initiatives at 30 June 2020.

The capital ratios published are for the BFA Group, Bankia's parent. The phase-in Common Equity Tier 1 capital ratio stood at 13.81% at 30 June 2020 and 13.57% at March 2020, including the earnings for the period. According to the Risk Assessment of the European Banking System, the average phase-in Common Equity Tier 1 capital ratio for European banks at 30 June 2020 was 15.0%, up from 14.6% at 31 March 2020.

(4.6) Capital management objectives and policies

The Group's capital management covers two targets – a regulatory capital target and an economic capital target.

The regulatory capital target entails amply satisfying the minimum capital requirements in applicable regulations (Pillar I and Pillar II), including additional capital buffers applicable at all times.

The economic capital target is set internally based on the results of the internal capital adequacy assessment process (ICAAP), which analyses the Group's risk profile and evaluates its internal control and corporate governance systems.

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The capital planning process is part of the Strategic Planning process to ensure that the capital plan is consistent, coherent and aligned with the strategic objectives, the Group's Risk Appetite Framework and the rest of the tactical plans comprising the financial plan for the forecast macroeconomic environment. The Management Committee updates the financial plan and, accordingly, the capital plan annually then submits them for approval by the Board of Directors. They form the basis for all planning, for shorter periods and for the budgeted period, and for the preparation of the ICAAP as a supervisory review document that includes the simulation of scenarios (i.e. stress tests). An organisational structure with a clear segregation of duties that prevents potential conflicts of interest and allows for the functions to be discharged within the capital planning process is required to carry out these processes.

In early 2017, the ECB embarked on a multi-year plan to drive improvements regarding the ICAAP so that the document meets supervisors' expectations, publishing its guides to the ICAAP and ILAAP in November 2018, which were applicable to ICAAP approved by the Management Committee in May 2020. Accordingly, the Bankia Group has aligned its regulatory capital planning to the principles outlined in the guides. Capital planning starts from the need to have adequate capital to guarantee the Entity's survival over time. The actions carried out are underpinned by risk management to comply with both Pillar I (credit, market and operational risk) and Pillar II (other risks; e.g. business, reputation) requirements, such as the Pillar II Requirement, Pillar II Guidance and capital buffers, which impact the Group and the Entity's remuneration policy (including the distribution of dividends). They are also geared towards integrated management of risks extended by the Entity in the scope of its corporate governance, the nature of the business, management of strategic planning and market demands, among other areas. Decision-making on capital management considers this enterprise-wide impact, whereby decisions are aligned with capital adequacy targets.

The capital planning exercise is based on financial planning (e.g. balance sheet, income statement, etc.), on the macroeconomic scenarios forecast by the Group and on the impact analysis of potential changes in capital adequacy regulations or those that may affect it. Distinction is made between baseline or expected scenarios and one or more stressed scenarios resulting from the application of a combination of adverse impacts on the expected situation. The capital planning process is formally documented in the following reports approved by the Entity's Board of Directors, which are reviewed at least once a year:

- The Corporate Risk Appetite and Tolerance Framework, which defines the level of risk appetite (internal capital target) based on the risks the Group is willing to assume in carrying out its business. Together with the capital target, tolerance or maximum levels of deviation from the established target which the Entity considers acceptable are determined.
- The Corporate Capital Planning Framework, which sets out a clear governance framework to ensure the involvement and coordinated orientation of the Group's various divisions related to the capital planning process, in order to achieve a common objective within the Group's Risk Appetite and Tolerance Framework.
- Capital Planning Policies, which include Senior Executive guidelines regarding capital preservation and correct risk measurement, as well as the corrective measures for potential deviations included in the Capital Contingency Plan.
- Recovery Plan, which sets out the solvency and leverage indicator levels below the Entity's tolerance level which, prior to potential non-compliance with regulations, would trigger the corrective measures in crisis situations, as well as the range of measures and execution of each.

Capital planning is a dynamic and ongoing process, therefore, these documents define a series of regulatory and financial indicators and metrics, with related minimum thresholds, calibrated and graded in accordance with the various levels of admission (Risk Appetite and Tolerance Levels, Early Warning levels and Recovery levels). The objective is to facilitate appropriate monitoring and control of the established targets and identify in advance future capital requirements and the corrective measures to be adopted.

In this respect, real capital adequacy ratios are measured against these metrics and indicators, and their various thresholds. Potential deviations are analysed to determine whether the causes relate to one-off or structural events. The measures required to adapt the level of capital, in order to meet the targets set, are analysed and decided. Failure to meet such targets could ultimately trigger the Capital Contingency Plan or even the Recovery Plan.

(5) Earnings per share and dividend policy

Basic and diluted earnings per share are calculated in accordance with the criteria stipulated in IAS 33:

- Earnings per share are calculated by dividing "Profit / (loss) attributable to the parent", adjusted for the after-tax amount corresponding to remuneration recognised in equity in connection with the contingent convertible bonds (see Note 19), by the weighted average number of shares outstanding, excluding the average number of shares held as treasury shares, over the course of the reporting period.
- Diluted earnings per share are determined using a method similar to that used to calculate basic earnings per share, by adjusting the weighted average number of shares outstanding and, where applicable, the profit for the year attributable to the parent, in order to take into account the potential dilutive effect of certain financial instruments that could generate the issue of new Bank shares (share option commitments with employees, warrants on parent company shares, convertible debt instruments) or discontinued operations.

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The table below shows the earnings per share corresponding to the years ended 31 December 2020 and 2019:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Attributable to the parent	229,803	541,436
Adjusted for: remuneration on contingent convertible bonds	(76,888)	(53,803)
Net earnings attributed to the parent	152,915	487,633
Of which:		
Earnings from discontinued operations (net)	-	-
Earnings from ordinary business	152,915	487,633
Weighted average number of shares outstanding	3,040,265,687	3,050,399,004
Basic earnings/(loss) per share (in euros)	0.05	0.16
Basic earnings/(loss) per share for discontinued operations (in euros)	-	-
Basic earnings/(loss) per share for continuing operations (in euros)	0.05	0.16
Dilutive effect		
Entitlement to receive shares	-	-
Adjusted average number of shares for the calculation	3,040,265,687	3,050,399,004
Diluted earnings/(loss) per share (in euros)	0.05	0.16
Diluted earnings/(loss) per share for discontinued operations (in euros)	-	-
Diluted earnings/(loss) per share for continuing operations (in euros)	0.05	0.16

Review of the capital distribution target set in the 2018-2020 Strategic Plan

On 27 March 2020 Bankia's Board of Directors decided that, given the potential impact of the COVID-19 crisis, the Entity should be very prudent in setting shareholder remuneration. Consequently, it reviewed the capital distribution objective set in the Group's 2018-2020 Strategic Plan, ruling out any extraordinary distributions this year and anticipating extreme prudence when defining the eventual dividend charged to 2020.

Furthermore, in the framework of Bankia and Caixabank's joint merger plan (see Note 1.17), both entities undertook not to declare payment of any definitive or interim dividend with a charge to reserves or profit, in cash or in kind, or to make any other distributions of their share capital or reserves or reimburse any part of their share capital until the filing date of the merger deed in the Mercantile Registry of Valencia.

Dividend payment charged to earnings for 2019

A resolution was adopted at the General Meeting of Shareholders of Bankia held on 27 March 2020 to distribute, against earnings for the year ended 31 December 2019, a gross dividend of EUR 0.11576 per share of Bankia, S.A. entitled to dividend and outstanding at the date payment is made. The dividend was paid in April 2020 with distribution of EUR 352,109,750.87.

(6) Remuneration of Board members and senior executives

(6.1) Remuneration of Board members

a) Remuneration accrued at the Bank

Regarding remuneration of directors for the performance of their duties as members of the Board of Directors, the Company applies the provisions of Royal Decree-Law 2/2012, of 3 February, on the reorganisation of the financial sector, and Order ECC/1762/2012, of 3 August. In this respect, fixed remuneration at Bankia, S.A. for all items of members of the various boards of directors other than executive chairmen, CEOs and executives of the companies is capped at EUR 100,000 per year. The limit for executive directors is EUR 500,000.

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i) Gross remuneration

(in thousands of euros)

Name	Salaries	Fixed remuneration	Short-term variable remuneration	Long-term variable remuneration	Remuneration for membership on Board committees	Termination benefits	2,020
Mr. José Ignacio Goirigolzarri Tellaeche (1)	500	-	-	-	-	-	500
Mr. José Sevilla Álvarez (1)	500	-	-	-	-	-	500
Mr. Antonio Ortega Parra (1)	500	-	-	-	-	-	500
Mr. Carlos Egea Krauel	-	100	-	-	-	-	100
Mr. Joaquín Ayuso García	-	100	-	-	-	-	100
Mr. Francisco Javier Campo García	-	100	-	-	-	-	100
Ms. Eva Castillo Sanz	-	100	-	-	-	-	100
Mr. Jorge Cosmen Menéndez-Castañedo	-	100	-	-	-	-	100
Mr. José Luis Feito Higuera	-	100	-	-	-	-	100
Mr. Fernando Fernández Méndez de Andés	-	100	-	-	-	-	100
Mr. Antonio Greño Hidalgo	-	100	-	-	-	-	100
Ms. Laura González Molero	-	100	-	-	-	-	100
Ms. Nuria Oliver Ramírez (2)	-	74	-	-	-	-	74

⁽¹⁾ The executive directors have renounced any variable remuneration in 2020.

⁽²⁾ Ms. Oliver was appointed as a Board member with effect as of 3 April 2020, with total remuneration of EUR 100,000 per year. The amounts shown correspond to the period from 3 April to 31 December 2020.

ii) Golden parachute clauses in Board of Directors' contracts

Pursuant to additional provision seven of Law 3/2012, Bankia may not pay "compensation for termination of contract" for employment contracts of Directors of Bankia in excess of the lower of the following amounts:

- EUR 1,000,000; or
- Two years of the fixed remuneration stipulated.

"Compensation for termination of contract" includes any amount of a compensatory nature that the director may receive as a consequence of termination of contract, whatever the reason, origin or purpose, so that the sum of all the amounts that may be received may not exceed the established limits.

The contracts of Messrs. Goirigolzarri, Sevilla and Ortega provide for compensation of one year of fixed remuneration if the Company decides to terminate their employment unilaterally or in the event of a change of control of the Company. The contracts also contain a post-contractual non-compete clause for the one year of fixed remuneration. In addition, the contracts of Messrs. Sevilla and Ortega also stipulate a notice period of three months, which is not included in Mr. Goirigolzarri's contract. Pursuant to prevailing legislation, Bankia has amended these contracts, establishing that any compensation and/or amounts received by the senior executives must comply with Royal Decree-Law 2/2012, Law 3/2012 and Law 10/2014.

iii) Share-based payment schemes

In 2020 shares have been allocated to Messrs. Goirigolzarri, Sevilla and Ortega equivalent to 25% of their annual variable remuneration accrued during 2016.

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iv) Long-term saving schemes

(in thousands of euros)		
Name	Contribution Funds and Pension Plans ⁽¹⁾	
	2020 by the Bank	Life Insurance Premiums 2020 by the Bank
Mr. José Ignacio Goirigolzarri Tellaache	-	-
Mr. José Sevilla Álvarez	-	-
Mr. Antonio Ortega Parra	-	-
Mr. Carlos Egea Krauel	-	-
Mr. Joaquín Ayuso García	-	-
Mr. Francisco Javier Campo García	-	-
Ms. Eva Castillo Sanz	-	-
Mr. Jorge Cosmen Menéndez-Castañedo	-	-
Mr. José Luis Feito Higuera	-	-
Mr. Fernando Fernández Méndez de Andés	-	-
Mr. Antonio Greño Hidalgo	-	-
Ms. Laura González Molero	-	-
Ms. Nuria Oliver Ramírez	-	-

⁽³⁾ Regarding pension obligations, there are no cumulative amounts as there is no pension scheme for directors.

b) Remuneration accrued for membership on the Boards of other Group companies or investees

On 7 June 2012, the Entity reported, in a material disclosure to the National Securities Market Commission, a press release regarding the review of its policy for remunerating directors in Group companies and investees. The press release stated that the Bank's Board of Directors had decided that directors representing it in investees would receive no remuneration and that the per diems to which they are entitled would be paid by the Group.

i) Gross remuneration

Not applicable.

ii) Share-based payment schemes

Not applicable.

iii) Long-term saving schemes

Not applicable.

iv) Other benefits

Not applicable.

c) Remuneration summary:

(in thousands of euros)			
Name	Total remuneration in the Entity	Total remuneration in the Group	Total 2020
Mr. José Ignacio Goirigolzarri Tellaache (1)	500	-	500
Mr. José Sevilla Álvarez (1)	500	-	500
Mr. Antonio Ortega Parra (1)	500	-	500
Mr. Carlos Egea Krauel	100	-	100
Mr. Joaquín Ayuso García	100	-	100
Mr. Francisco Javier Campo García	100	-	100
Ms. Eva Castillo Sanz	100	-	100
Mr. Jorge Cosmen Menéndez-Castañedo	100	-	100
Mr. José Luis Feito Higuera	100	-	100
Mr. Fernando Fernández Méndez de Andés	100	-	100
Mr. Antonio Greño Hidalgo	100	-	100
Ms. Laura González Molero	100	-	100
Ms. Nuria Oliver Ramírez (2)	74	-	74

⁽¹⁾ The executive directors have renounced any variable remuneration in 2020.

⁽²⁾ Ms. Oliver was appointed as a Board member with effect as of 3 April 2020, with total remuneration of EUR 100,000 per year. The amounts shown correspond to the period from 3 April to 31 December 2020.

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(6.2) Remuneration of the Bank's senior executives (Management Committee)

a) Remuneration accrued at the Bank

For the purposes of these financial statements, the members of the Management Committee, without taking into consideration the executive directors, were considered as senior executives. A total of nine people, Mr. Miguel Crespo Rodríguez, Ms. Amalia Blanco Lucas, Mr. Fernando Sobrini Aburto, Mr. Gonzalo Alcubilla Povedano, Mr. Leopoldo Alvear Trenor, Mr. Manuel Galarza Pont, Mr. David López Puig, Mr. Eugenio Solla Tomé and Mr. Carlos Torres García, were classified for these purposes as key personnel for the Bank.

Regarding remuneration of senior executives, the Entity applies the provisions of Royal Decree-Law 2/2012, of 3 February, on the reorganisation of the financial sector, Law 3/2012, of 6 July, on urgent measures to reform the labour market, Ministry of Economy Order ECC/1762/2012, of 3 August, and Law 10/2014, of 26 June, on the organisation, supervision and solvency of credit institutions.

i) Gross remuneration

The following table shows the remuneration accrued by senior executives:

(in thousands of euros)					
	Short-term remuneration ⁽¹⁾	Long-term remuneration ⁽¹⁾	Post-employment benefits ⁽²⁾	Termination benefits	Total
Senior Executives	4,771	414	286	-	5,471

⁽¹⁾ The amount of variable remuneration accrued in 2020 is pending the pertinent authorisation and approval envisaged in current legislation.

⁽²⁾ Reflects contributions made in respect of pensions and life insurance premiums.

ii) Golden parachute clauses in senior executive contracts

Pursuant to additional provision seven of Law 3/2012, Bankia may not pay "compensation for termination of contract" for employment contracts of senior executives of Bankia in excess of the lower of the following amounts:

- EUR 1,000,000; or
- Two years of the fixed remuneration stipulated.

"Compensation for termination of contract" includes any amount of a compensatory nature that the executive may receive as a consequence of termination of contract, whatever the reason, origin or purpose, and the sum of all the amounts that may be received may not exceed the established limits.

The contracts of nine senior executives include clauses that set compensation for all items if they are dismissed for legal reasons, except for disciplinary reasons considered legally valid, equivalent to two years' fixed remuneration. Pursuant to prevailing legislation, Bankia has amended these contracts, establishing that any compensation and/or amounts received by the senior executives must comply with Royal Decree-Law 2/2012, Law 3/2012 and Law 10/2014.

iii) Share-based payment schemes

In 2020 shares have been allocated to Ms. Blanco and Messrs. Alcubilla and Sobrini equivalent to 25% of their annual variable remuneration accrued during 2016.

(6.3) Situations of conflict of interest of Bank directors

In accordance with the disclosure requirements under article 229 of Royal Legislative Decree 1/2010, of 2 July, enacting the Revised Spanish Companies Act, it is hereby stated that at 31 December 2020 none of the directors are in any of the situations constituting a conflict of interest set out in said article.

Notwithstanding the above, according to the Regulations of the Board of Directors, directors must notify the Board of Directors of any direct or indirect conflict which they or persons related to them may have with the interests of the Entity. Moreover, directors must refrain from deliberating or voting on resolutions or decisions in which they, or persons related to them, have a direct or indirect conflict of interest.

In this respect, in accordance with Section 228.c) of Royal Legislative Decree 1/2010, of 2 July, enacting the Revised Spanish Companies Act, it is hereby stated that during 2020:

- On 19 occasions, Bank directors (Mr. Francisco Javier Campo, Mr. Jorge Cosmen Menéndez-Castañedo, Mr. Carlos Egea Krauel, Ms. Laura González Molero and Mr. Antonio Ortega Parra) refrained from participating in the deliberation and voting on matters at the Board of Directors' meetings regarding transactions that they, or persons related to them, had a direct or indirect potential conflict of interest with the Bank.
- In addition, in keeping with the best practices of corporate governance, the Executive Directors of the Entity, Mr. José Ignacio Goirigolzarri Tellaeché, Mr. José Sevilla Álvarez and Mr. Antonio Ortega Parra, as members of the Board of Directors of BFA,

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Tenedora de Acciones, S.A.U. (BFA), with Mr. José Ignacio Goirigolzarri Tellaache also being the legal representative of and member and chairman of the Board of Directors of the FROB, have refrained from participating in the deliberation and voting on the following matters: Bankia Group-BFA financial programme, regularisation of the BFA-Bankia recovery service agreement, financing of SAREB bonds in BFA, Bankia-BFA ATA transaction and agreement for the regularisation of SAREB obligations.

(7) Proposed distribution of profit of Bankia, S.A.

The distribution of the individual profit of Bankia, S.A. for the financial year ended 31 December 2020 proposed by the Board of Directors of Bankia, S.A., to be submitted for approval at the General Meeting of Shareholders (with comparative data for 2019), is as follows:

(in thousands of euros)		
ITEM	202020	2019
To reserves	250,565	207,621
To dividends	-	355,328
Net profit for the year	250,565	562,949

(8) Cash, cash balances at central banks and other demand deposits

Details of "Cash, cash balances at central banks and other demand deposits" on the accompanying consolidated balance sheets is as follows:

(in thousands of euros)		
ITEM	31/12/20	31/12/2019
Cash	936,301	951,826
Cash balances at central banks	10,381,844	11,673,382
Other demand deposits	490,082	577,677
Total	11,808,227	13,202,885

(9) Financial assets and liabilities held for trading

Breakdown

Details of these items on the accompanying consolidated balance sheets, by type of counterparty and type of instrument, indicating the carrying amount at 31 December 2020 and 2019, are as follows:

(in thousands of euros)				
ITEM	31/12/2020		31/12/2019	
	Asset positions	Liability positions	Asset positions	Liability positions
By counterparty				
Credit institutions	4,568,451	5,916,998	4,383,398	5,830,357
Resident general government	202,825	-	273,336	-
Non-resident general government	-	-	18,484	-
Other resident sectors	1,679,684	889,029	1,700,445	859,142
Other non-resident sectors	316,946	70,164	315,238	60,612
Total	6,767,906	6,876,191	6,690,901	6,750,111
By type of instrument				
Derivatives	6,686,668	6,686,987	6,518,725	6,478,878
Equity instruments	684	-	1,381	-
Debt securities	80,554	-	170,795	-
Short positions	-	189,204	-	271,233
Total	6,767,906	6,876,191	6,690,901	6,750,111

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Note 3.1 contains information on the credit risk assumed by the Group in relation to these financial assets. Notes 3.2 and 3.4 contain, respectively, information relating to the liquidity risk and interest rate risk assumed by the Group in relation to the financial assets included in this category.

Note 25 contains certain information on the fair value of these financial assets, while Note 3.1.5 discloses certain information on the risk concentration of, inter alia, certain assets included in this category of financial instruments.

Financial assets and liabilities held for trading. Derivatives

The following table presents a breakdown, by class of derivative, of the fair value of the Group's derivatives classified as held for trading at 31 December 2020 and 2019:

(in thousands of euros)						
ITEM	31/12/2020			31/12/2019		
	Fair value	Amount netted	Carrying amount	Fair value	Amount netted	Carrying amount
Debit balances						
Unmatured foreign currency purchases and sales	56,479	-	56,479	66,859	-	66,859
Equity derivatives	6,958	-	6,958	7,583	-	7,583
Interest rate derivatives	14,556,603	(8,005,643)	6,550,960	12,690,868	(6,306,025)	6,384,843
Credit derivatives	-	-	-	178	-	178
Other	72,271	-	72,271	59,262	-	59,262
Total	14,692,311	(8,005,643)	6,686,668	12,824,750	(6,306,025)	6,518,725
Credit balances						
Unmatured foreign currency purchases and sales	22,724	-	22,724	57,374	-	57,374
Equity derivatives	9,861	-	9,861	9,380	-	9,380
Interest rate derivatives	14,584,984	(8,005,643)	6,579,341	12,656,291	(6,306,025)	6,350,266
Credit derivatives	-	-	-	219	-	219
Other	75,061	-	75,061	61,639	-	61,639
Total	14,692,630	(8,005,643)	6,686,987	12,784,903	(6,306,025)	6,478,878

Details, by maturity, of the notional amount of trading derivatives at 31 December 2020 and 2019, are as follows:

31 December 2020

(in thousands of euros)				
ITEM	0 to 3 years	3 to 10 years	More than 10 years	Total
Unmatured foreign currency purchases and sales	2,522,561	168,382	-	2,690,943
Equity derivatives	2,456,306	1,893,044	285,400	4,634,750
Interest rate derivatives	108,778,584	129,460,018	51,435,312	289,673,914
Credit derivatives	-	-	-	-
Other	5,185,913	-	-	5,185,913
Total	118,943,364	131,521,444	51,720,712	302,185,520

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31 December 2019

(in thousands of euros)

ITEM	0 to 3 years	3 to 10 years	More than 10 years	Total
Unmatured foreign currency purchases and sales	4,016,455	7,786	-	4,024,241
Equity derivatives	1,719,043	2,780,862	349,401	4,849,306
Interest rate derivatives	99,181,161	109,166,808	56,575,436	264,923,405
Credit derivatives	615,727	-	-	615,727
Other	4,668,749	-	-	4,668,749
Total	110,201,135	111,955,456	56,924,837	279,081,428

The notional amount of derivatives is the amount that is used as a basis for estimating the results associated therewith, although, inasmuch as a highly significant portion of these positions offset one another, thus hedging the risks assumed, the notional amount cannot be understood to represent a reasonable measure of the Group's exposure to the risks associated with these products.

Financial assets held for trading. Equity instruments

The breakdown of this heading on the accompanying consolidated balance sheets is as follows:

(in thousands of euros)

ITEM	31/12/2020	31/12/2019
Shares of resident companies	545	1,250
Shares of non-resident foreign companies	139	131
Total	684	1,381

Financial assets held for trading. Debt securities

The breakdown of this heading on the accompanying consolidated balance sheets is as follows:

(in thousands of euros)

ITEM	31/12/2020	31/12/2019
Spanish government debt securities	80,554	142,414
Foreign government debt securities	-	18,485
Issued by financial institutions	-	-
Other foreign fixed-income securities	-	-
Other Spanish fixed-income securities	-	9,896
Total	80,554	170,795

The annual average effective interest rate of debt securities included in the financial assets held for trading portfolio at 31 December 2020 was 0.16% (0.50% at 31 December 2019).

(10) Non-trading financial assets mandatorily at fair value through profit or loss

Details of these items on the accompanying consolidated balance sheets, by type of counterparty and type of instrument, indicating the carrying amount at 31 December 2020 and 2019, are as follows:

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
By counterparty		
Other resident sectors	11,385	34,755
Total	11,385	34,755
By type of instrument		
Debt securities	193	237
Loans and advances	11,192	34,518
Central banks	-	-
Credit institutions	-	23,263
Customers	11,192	11,255
Total	11,385	34,755

Note 3.1 contains information on the credit risk assumed by the Group in relation to these financial assets. Notes 3.2 and 3.4 contain, respectively, information relating to the liquidity risk and interest rate risk assumed by the Group in relation to the financial assets included in this category.

Note 25 contains certain information on the fair value of these financial assets, while Note 3.1.5 discloses certain information on the risk concentration of, inter alia, certain assets included in this category of financial instruments.

(11) Financial assets at fair value through other comprehensive income

Breakdown

Details of this item on the accompanying consolidated balance sheets, by type of counterparty and type of financial instrument, are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
By counterparty		
Credit institutions	32,842	44,495
Resident general government	8,066,397	11,155,672
Non-resident general government	189,680	291,393
Other resident sectors	68,574	153,308
Other non-resident sectors	266,674	337,549
Non-performing assets	-	-
Impairment losses	(532)	(545)
Total	8,623,635	11,981,872
By type of instrument		
Debt securities	8,564,092	11,906,055
Spanish government debt securities	8,066,397	11,155,672
Government bonds	7,865,144	10,861,586
Regional administrations	201,253	294,086
Foreign government debt securities	189,680	291,393
Issued by financial institutions	6,367	18,020
Other fixed-income securities	302,180	441,515
Impairment losses	(532)	(545)
Equity instruments	59,543	75,817
Total	8,623,635	11,981,872

Note 3.1 contains information on the credit risk assumed by the Group in relation to these financial assets. Notes 3.2 and 3.4 contain, respectively, information relating to the liquidity risk and interest rate risk assumed by the Group in relation to the financial assets included in this category.

Note 23 provides details of the gains and losses on these financial instruments recognised under “Accumulated other comprehensive income” on the accompanying consolidated balance sheets.

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Note 25 contains certain information on the fair value of these financial assets, while Note 3.1.5 discloses certain information on the risk concentration of, inter alia, certain assets included in this category of financial instruments.

The annual average effective interest rate of debt securities included in the financial assets at fair value through other comprehensive income portfolio at 31 December 2020 was 0.38% (0.90% at 31 December 2019).

Non-performing and past-due assets

At 31 December 2020 and 2019, no assets classified as “Financial assets at fair value through other comprehensive income” were considered non-performing or had any past-due amounts.

Changes for the year in impairment losses

A summary of the changes in relation to impairment losses and fair value adjustments due to credit risk of debt securities included in this portfolio in 2020 and 2019 is as follows:

(in thousands of euros)		
ITEM	2020	2019
Opening balance at 31 December	545	1,108
Impairment losses for the year charged to income	455	(23)
Available credit loss allowance	(257)	(529)
Net provision/(release) charged/(credited) to the income statement (Note 42)	198	(552)
Allowances used for depreciated assets	(211)	(11)
Other changes	-	-
Closing balance at 31 December	532	545
<i>Of which: Type of counterparty:</i>	<i>532</i>	<i>545</i>
<i>Entities resident in Spain</i>	<i>307</i>	<i>300</i>
<i>Entities resident abroad</i>	<i>225</i>	<i>245</i>

During 2020 and 2019, the Group did not record any impairment losses in the consolidated income statement on equity instruments recognised under “Non-current assets and disposal groups classified as held for sale”.

(12) Financial assets at amortised cost

(12.1) Breakdown

Details of this item on the accompanying consolidated balance sheets, based on the nature of the related financial instrument, are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Financial assets at amortised cost		
Loans and advances	128,952,189	125,851,369
Credit institutions	4,920,706	5,471,339
Customers	124,031,483	120,380,030
Debt securities	37,460,391	33,077,574
Sum	166,412,580	158,928,943
Impairment losses	(3,337,886)	(3,189,159)
Other valuation adjustments	330,384	228,656
Total	163,405,078	155,968,440

Note 3.1 contains information on the credit risk assumed by the Group in relation to these financial assets. Notes 3.2 and 3.4 contain, respectively, information relating to the liquidity risk and interest rate risk assumed by the Group in relation to the financial assets included in this category.

Note 25 contains certain information on the fair value of these financial assets, while Note 3.1.5 discloses certain information on the risk concentration of, inter alia, certain assets included in this category of financial instruments.

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(12.2) Credit quality of financial assets at amortised cost portfolio

The following table shows financial assets at amortised cost, based on their credit risk classification, distinguishing between gross value and related impairment losses at 31 December 2020 and 31 December 2019:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Gross amount ^(*)		
Stage 1 – Performing exposures	149,819,948	145,047,733
Stage 2 – Performing exposures under special monitoring	11,202,062	8,244,241
Stage 3 – Non-performing exposures	5,720,954	5,865,625
Sum	166,742,964	159,157,599
Impairment allowances		
Stage 1 – Performing exposures	(180,033)	(208,660)
Stage 2 – Performing exposures under special monitoring	(625,732)	(440,015)
Stage 3 – Non-performing exposures	(2,532,121)	(2,540,484)
Sum	(3,337,886)	(3,189,159)
Carrying amount		
Stage 1 – Performing exposures	149,639,915	144,839,073
Stage 2 – Performing exposures under special monitoring	10,576,330	7,804,226
Stage 3 – Non-performing exposures	3,188,833	3,325,141
Sum	163,405,078	155,968,440

^(*) Includes "Other valuation adjustments".

(12.3) Movement in financial assets at amortised cost. Stages of credit impairment

The following table sets out the movements in 2020 and 2019 between stages 1, 2 and 3 in terms of the gross carrying amount of financial assets at amortised cost:

2020

(in thousands of euros)				
ITEM	Stage 1	Stage 2	Stage 3	Total
Balance at the beginning of the period	145,047,733	8,244,241	5,865,625	159,157,599
Inter-stage transfer	(4,836,420)	4,187,241	649,179	-
Stage 1 – Performing exposures	(6,992,535)	6,572,269	420,266	-
Stage 2 – Performing exposures under special monitoring	2,150,738	(2,686,132)	535,394	-
Stage 3 – Non-performing exposures	5,377	301,104	(306,481)	-
Additions, disposals and balance variations	9,608,635	(1,229,420)	(370,513)	8,008,702
Write-offs	-	-	(423,337)	(423,337)
Balance at the end of the period	149,819,948	11,202,062	5,720,954	166,742,964

2019

(in thousands of euros)				
ITEM	Stage 1	Stage 2	Stage 3	Total
Balance at the beginning of the period	144,313,389	8,635,397	7,731,664	160,680,450
Inter-stage transfer	(726,693)	497,069	229,624	-
Stage 1 – Performing exposures	(2,419,171)	2,007,104	412,067	-
Stage 2 – Performing exposures under special monitoring	1,654,535	(2,167,437)	512,902	-
Stage 3 – Non-performing exposures	37,943	657,402	(695,345)	-
Additions, disposals and balance variations	1,461,037	(888,225)	(1,467,866)	(895,054)
Write-offs	-	-	(627,797)	(627,797)
Balance at the end of the period	145,047,733	8,244,241	5,865,625	159,157,599

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(12.4) Movement in credit impairment by stages

The following table sets out the movement in impairment losses on financial assets at amortised cost by stages of credit impairment in 2020 and 2019:

2020

ITEM	Stage 1	Stage 2	Stage 3	Total
Balance at the beginning of the period	208,660	440,015	2,540,484	3,189,159
Variations due to origination and acquisition, derecognition and credit risk variation (net)	(28,044)	196,568	887,795	1,056,319
Allowances used for depreciated assets	-	-	(783,502)	(783,502)
Transfer to non-current assets held for sale and other movements	(583)	(10,851)	(112,656)	(124,090)
Balance at the end of the period	180,033	625,732	2,532,121	3,337,886
Of which individually identified	-	63,752	616,754	680,506
Of which collectively identified	180,033	561,980	1,915,367	2,657,380

2019

ITEM	Stage 1	Stage 2	Stage 3	Total
Balance at the beginning of the period	226,317	619,333	3,373,360	4,219,010
Variations due to origination and acquisition, derecognition and credit risk variation (net)	(15,457)	(178,050)	694,090	500,583
Allowances used for depreciated assets	-	-	(1,312,917)	(1,312,917)
Transfer to non-current assets held for sale and other movements	(2,200)	(1,268)	(214,049)	(217,517)
Balance at the end of the period	208,660	440,015	2,540,484	3,189,159
Of which individually identified	-	69,067	886,007	955,074
Of which collectively identified	208,660	370,948	1,654,477	2,234,085

(12.5) Credit quality of financial assets at amortised cost portfolio. Guarantees received

The breakdown at 31 December 2020 and 2019 of guarantees received in relation to loans and advances on the accompanying consolidated balance sheets is as follows:

(in thousands of euros)		
ITEM (*)	31/12/2020	31/12/2019
Value of collateral	74,798,224	75,939,912
Of which: collateral for performing exposures under special monitoring	5,384,045	5,022,526
Of which: collateral for non-performing exposures	7,309,305	5,952,561
Value of other guarantees	-	-
Total	74,798,224	75,939,912

(*) The value of the guarantee or collateral is the lower of the guarantee received and the amount of the loan, except for non-performing exposures, where the relevant measure is fair value.

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(12.6) Financial assets at amortised cost. Loans and advances. Credit institutions

Details of this caption on the accompanying consolidated balance sheets, by type of instrument, are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
By type of instrument		
Time deposits	188,738	115,244
Reverse repurchase agreements	2,755,191	3,509,138
Other financial assets	1,973,644	1,842,619
Non-performing assets	3,133	4,338
Sum	4,920,706	5,471,339
Impairment losses	(2,468)	(737)
Other valuation adjustments	(2,469)	(3,160)
Total	4,915,769	5,467,442

The annual average effective interest rate of financial instruments included under this heading at 31 December 2020 was 0.85% (0.81% at 31 December 2019).

(12.7) Financial assets at amortised cost. Loans and advances. Customers

Details of this caption on the accompanying consolidated balance sheets, by counterparty sector and by loan type and status, are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
By counterparty sector		
General government	5,726,419	4,933,611
Other financial corporations	2,561,946	1,970,643
Non-financial corporations	42,061,478	37,068,929
Households	73,967,432	76,638,663
Sum	124,317,275	120,611,846
Impairment losses	(3,323,004)	(3,178,835)
Total	120,994,271	117,433,011

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
By loan type and status		
Commercial credit	5,251,993	5,764,769
With collateral	68,739,500	71,625,751
Reverse repurchase agreements	179,659	15,397
Other term loans	40,667,158	33,588,126
Receivable on demand and other	2,453,788	2,583,290
Other financial assets	1,030,150	950,032
Non-performing assets	5,709,235	5,852,665
Sum	124,031,483	120,380,030
Impairment losses	(3,323,004)	(3,178,835)
Other valuation adjustments	285,792	231,816
Total	120,994,271	117,433,011

The carrying amount shown in the foregoing table, disregarding the portion reflecting "Other valuation adjustments", represents the Group's maximum level of credit risk exposure in relation to the financial instruments included therein.

The annual average effective interest rate of financial instruments included under this heading at 31 December 2020 was 1.55% (1.73% at 31 December 2019).

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"Financial assets at amortised cost - Loans and advances - Customers" on the accompanying consolidated balance sheets include loans with mortgage collateral which, as indicated in Appendix VIII and under the Mortgage Market Law, are considered eligible to guarantee the issue of long-term covered bonds.

This item also includes securitised loans that have not been derecognised from the consolidated balance sheets (see Note 2.2.2). The amounts shown on the accompanying consolidated balance sheets related to securitised loans are:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Securitised mortgage assets	8,137,843	9,213,001
Of which:		
Receivable on demand and other	1,786	2,423
Non-performing assets	437,608	467,718
Other securitised assets	10,359	11,530
Total	8,148,202	9,224,531
Of which:		
Liabilities associated with assets held on the balance sheet (*)	1,041,758	1,531,026

(*) Recognised under "Financial liabilities at amortised cost - Debt securities issued" on the accompanying consolidated balance sheets.

Other securitised loans were derecognised from the accompanying consolidated balance sheets as the Group did not retain substantially either the risks or rewards, as follows (see Note 2.2.2):

(in thousands of euros)		
Securitised loans	31/12/2020	31/12/2019
Securitised mortgage assets	1,360,381	1,459,950
Other securitised assets	3,143	1,821
Total (*)	1,363,524	1,461,771

(*) At 31 December 2020, this item includes transfers of assets through mortgage transfer certificates, excluding transactions considered as write-offs that were previously derecognised from the consolidated balance sheet.

In 2012 and 2013 assets classified under this balance sheet heading were transferred to the SAREB, with a number of adjustments being made to the asset transfer deed up to 2017.

(12.8) Non-performing assets

Details of the movement in non-performing loans and advances to credit institutions and customers, within the financial assets at amortised cost portfolio, during 2020 and 2019 are as follows:

(in thousands of euros)		
ITEM	2020	2019
Carrying amount at the beginning of the period	5,857,003	7,722,462
Additions	1,550,364	1,985,463
Disposals	(1,694,998)	(3,850,922)
Foreclosures	(168,054)	(302,461)
Portfolio sales	(4,714)	(410,163)
Recoveries and other	(1,028,982)	(1,853,877)
Debt pardoning and disposals of assets	(423,337)	(627,797)
Transfers to disposal group (*)	(69,911)	(656,624)
Carrying amount at the end of the period	5,712,369	5,857,003

(*) Note 18.5.1 includes the balances classified as disposal groups that, at 31 December 2020, were still recognised on the consolidated balance sheet because their disposal did not occur in 2020.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

The table below shows the classification of the Bankia Group's non-performing financial assets at amortised cost related to "Loans and advances to customers" and "Loans and advances to credit institutions" included in "Loans and advances" at 31 December 2020 and 2019, by counterparty, age of the oldest past-due amount of each, and the type of guarantee or collateral:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
By counterparty		
Credit institutions	3,133	4,337
General government	84,055	89,962
Other financial corporations	12,646	15,335
Non-financial corporations	2,178,849	2,690,948
Households	3,433,686	3,056,421
Total	5,712,369	5,857,003
By age		
Up to 6 months (*)	2,345,583	2,516,688
Between 6 and 12 months	580,263	557,293
More than 12 months	2,786,523	2,783,022
Total	5,712,369	5,857,003
By type of guarantee		
Mortgage collateral	3,963,009	3,803,759
Other collateral	32,071	44,493
Without collateral	1,717,289	2,008,751
Total	5,712,369	5,857,003

(*) At 31 December 2020, approximately 85% of the balance consisted of transactions with no past-due amounts or amounts that are less than 90 days past due (83% at 31 December 2019).

Past-due income receivable from non-performing assets accumulated at 31 December 2020 amounts to EUR 288,662 thousand (EUR 292,761 thousand at 31 December 2019).

The following table provides a breakdown of non-performing assets with collateral included in this category by the percentage of risk in relation to the value of the collateral ("loan-to-value"), as the key measure for the collateral in connection with the risks to which it relates:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Less than or equal to 40%	383,670	371,866
More than 40% and less than or equal to 60%	429,956	416,114
More than 60% and less than or equal to 80%	548,382	475,870
More than 80%	2,633,072	2,584,402
Total	3,995,080	3,848,252

(12.9) Assets past due

The table below shows the classification of the Bankia Group's assets past-due but not impaired related to "Loans and advances to customers" and "Loans and advances to credit institutions" at 31 December 2020 and 2019, by counterparty, age past-due and type of guarantee or collateral:

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(in thousands of euros)

ITEM	31/12/2020	31/12/2019
By counterparty		
Credit institutions	663	6,808
General government	9,417	37,447
Other financial corporations	16,692	19,242
Non-financial corporations	33,086	101,373
Households	29,039	39,018
Total	88,897	203,888
By age		
Less than 1 month	69,344	151,874
Between 1 and 3 months	19,553	52,014
More than 3 months	-	-
Total	88,897	203,888
By type of guarantee		
Mortgage collateral	21,610	29,832
Other collateral	139	1,331
Without collateral	67,148	172,725
Total	88,897	203,888

The following table provides a breakdown of assets with collateral included in this category by the percentage of risk in relation to the value of the collateral ("loan-to-value"), as the key measure for the collateral in connection with the risks to which it relates:

(in thousands of euros)

ITEM	31/12/2020	31/12/2019
Less than or equal to 40%	7,086	8,245
More than 40% and less than or equal to 60%	4,076	6,477
More than 60% and less than or equal to 80%	3,973	5,378
More than 80%	6,614	11,063
Total	21,749	31,163

(12.10) Movement in impairment losses

The table below shows the changes for the years ended 31 December 2020 and 2019 in provisions for impairment losses and fair value adjustments due to credit risk in relation to assets in "Credit institutions" and "Customers" under "Financial assets at amortised cost - Loans and advances" on the consolidated balance sheet:

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(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31 December 2020

(in thousands of euros)

ITEM	Allowance for credit risk losses	Country risk allowance	Total
Balance at the beginning of the period	3,177,911	1,661	3,179,572
Of which individually identified	955,074	-	955,074
Of which collectively identified	2,222,837	1,661	2,224,498
Impairment losses for the year charged to income	2,193,132	560	2,193,692
Available credit loss allowance	(1,147,309)	(951)	(1,148,260)
Net provision/(release) charged/(credited) to the income statement	1,045,823	(391)	1,045,432
Allowances used for depreciated assets	(798,933)	-	(798,933)
Exchange differences	(2,299)	(4)	(2,303)
Other changes	(98,296)	-	(98,296)
Balance at the end of the period	3,324,206	1,266	3,325,472
Of which individually identified	674,747	-	674,747
Of which collectively identified	2,649,459	1,266	2,650,725
Of which:			
Type of counterparty:	3,324,206	1,266	3,325,472
Entities resident in Spain	3,131,110	-	3,131,110
Entities resident abroad	193,096	1,266	194,362

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31 December 2019

(in thousands of euros)

ITEM	Allowance for credit risk losses	Country risk allowance	Total
Balance at the beginning of the period	4,207,166	4,318	4,211,484
Of which individually identified	1,574,212	-	1,574,212
Of which collectively identified	2,632,954	4,318	2,637,272
Impairment losses for the year charged to income	1,110,940	9,389	1,120,329
Available credit loss allowance	(609,239)	(12,018)	(621,257)
Net provision/(release) charged/(credited) to the income statement	501,701	(2,629)	499,072
Allowances used for depreciated assets	(1,322,647)	-	(1,322,647)
Exchange differences	1,447	-	1,447
Other changes	(209,756)	(28)	(209,784)
Balance at the end of the period	3,177,911	1,661	3,179,572
Of which individually identified	955,074	-	955,074
Of which collectively identified	2,222,837	1,661	2,224,498
Of which:			
Type of counterparty:	3,177,911	1,661	3,179,572
Entities resident in Spain	2,999,531	-	2,999,531
Entities resident abroad	178,380	1,661	180,041

The different items recognised in 2020 and 2019 under “Impairment or (-) reversal of impairment on financial assets not measured at fair value through profit or loss – Financial assets at amortised cost” on the consolidated income statements for those years are summarised below:

(in thousands of euros)

ITEM	31/12/2020	31/12/2019
Net charge for the year	1,054,633	501,133
Write-off assets recovered	(11,039)	(37,640)
Impairment or (-) reversal of impairment on financial assets not measured at fair value through profit or loss – Financial assets at amortised cost (Note 42)	1,043,594	463,493

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(12.11) Financial assets at amortised cost. Debt securities

Details of this caption on the accompanying consolidated balance sheets, by counterparty, are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
By counterparty		
Credit institutions	25,025	25,006
Resident general government	13,005,451	10,012,858
Non-resident general government	5,794,638	4,255,837
Other resident sectors	18,560,768	18,752,317
Other non-resident sectors	65,924	22,936
Non-performing assets	8,585	8,620
Sum	37,460,391	33,077,574
Impairment losses	(12,414)	(9,587)
Other valuation adjustments	47,061	-
Total	37,495,038	33,067,987
By type of instrument		
Spanish government debt securities	13,005,451	10,012,858
Foreign government debt securities	5,794,638	4,255,837
Bonds and obligations	18,707,363	18,808,879
Impairment losses	(12,414)	(9,587)
Total	37,495,038	33,067,987

The balances in "Other resident sectors" and "Bonds and Obligations" include the debt securities issued by Sociedad de Gestión de Activos Procedentes de la Reestructuración Bancaria (SAREB) backed by the Spanish Government, which were received at the time as consideration for the assets transferred by the BFA Group to SAREB in December 2012, at a price of EUR 22,317 million: EUR 2,850 million to BFA in respect of the part of the price relating to its own assets and those of its subsidiaries and EUR 19,467 million to Bankia in respect of the part of the price relating to its own assets and those of Bankia subsidiaries. They also include the debt securities received as consideration for the assets originally transferred by the BMN Group in February 2013 for EUR 5,820 million – absorbed following its merger by the Bankia Group.

The securities received by the Group (with original maturities at 31 December 2013, 2014 and 2015 and 28 February 2014, 2015 and 2016) include an annual renewal option for the issuer, although the estimated value of that option does not generate any negative difference between the fair value of the instruments and the nominal value at the transaction date.

In 2013 and subsequent years, the SAREB redeemed and delivered new bonds. Accordingly, the securities received by the Group and recognised under "Financial assets at amortised cost" at 31 December 2020 were as follows:

(Thousands of euros and %)			
Securities	Amount	Maturity	Interest rate
SAREB 2020-3 Bond	7,623,700	31.12.2022	-
SAREB 2020-2 Bond	5,549,800	31.12.2021	-
SAREB 2019-2 Bond	2,425,000	28.02.2021	-
SAREB 2020-1 Bond	1,681,300	28.02.2021	-
SAREB 2018-4 Bond	942,300	31.12.2021	-
SAREB 2019-3 Bond	264,800	28.02.2022	-

As these cancellations were made at the nominal amount, there were no differences with respect to the carrying amounts. Therefore, the transactions did not have a significant impact on the Group's consolidated income statement for prior years.

At the maturity date, the unamortised cash amount was exchanged for other bonds with a similar maturity (rollover option) and bearing interest at 3-month Euribor plus a spread, which was considered equivalent to market rates of interest for public debt with a similar term. Accordingly, the bonds were recorded at their nominal amount, with no impact recognised on the Group's income statement for 2020. Rollovers of bonds carried out in previous years also had no impact whatsoever on the Group's income statement for those years.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Note 3.1 contains information on the credit risk assumed by the Group in relation to these financial assets. Notes 3.2 and 3.4 contain, respectively, information relating to the liquidity risk and interest rate risk assumed by the Group in relation to the financial assets included in this category.

Note 25 contains certain information on the fair value of these financial assets, while Note 3.1.5 discloses certain information on the risk concentration of, inter alia, certain assets included in this category of financial instruments.

The annual average effective interest rate of debt securities classified in the financial assets at amortised cost portfolio at 31 December 2020 was 0.49% (0.52% at 31 December 2019).

The Group's debt securities classified as financial assets at amortised cost included assets of EUR 8,585 thousand at 31 December 2020 (EUR 8,620 thousand at 31 December 2019) that were assessed individually as being impaired due to credit risk.

At 31 December 2020 and 2019, the Group had no debt securities classified in the financial assets at amortised cost portfolio with amounts past-due and not impaired.

On 30 October 2018, the arbitration process between Sareb and other entities, including Bankia (jointly referred to as the "Entities"), arising from the bonds issued by Sareb to address the payment of certain assets that the Entities transferred to Sareb in compliance with the obligation imposed by Law 9/2012, of 14 November, was resolved. The discrepancy submitted to arbitration concerned the possibility that the quarterly coupon of the bonds corresponding to the 2017 and 2018 Senior Issues could be negative and the Entities would be obliged to pay Sareb the amount of the negative coupon. The ruling concludes that the quarterly coupon of the Senior Bonds of the 2017-3 and 2018-1 issues cannot be negative and must be limited to 0%; a limitation that extends to future issues of Sareb Bonds when the calculation formula yields a negative result.

A summary of the changes in impairment losses, due to credit risk, on debt securities classified as financial assets at amortised cost during the years ended 31 December 2020 and 2019 is as follows:

(in thousands of euros)		
ITEM	2020	2019
Balance at 31 December	9,587	7,526
Impairment losses for the year charged to income	10,314	2,196
Available credit loss allowance	(1,207)	(135)
Net provision/(release) charged/(credited) to the income statement	9,107	2,061
Allowances used for depreciated assets and other net movements	(6,281)	-
Other changes	1	-
Balance at 31 December	12,414	9,587
Of which:		
Type of counterparty:	12,414	9,587
Entities resident in Spain	8,573	9,439
Entities resident abroad	3,841	148

(13) Derivatives – Hedge accounting

At 31 December 2020 and 2019, the Group had entered into financial derivative hedging arrangements with counterparties of recognised creditworthiness as the basis of an improved management of the risks inherent in its business (see Note 3).

The Group enters into hedges on a transaction-by-transaction basis by assessing the hedging instrument and the hedged item on an individual basis and continually monitoring the effectiveness of each hedge, to ensure that changes in the value of the hedging instrument and the hedged item offset one another.

Note 2.3 details the Group's main hedged positions and the financial hedging instruments.

The benchmark interest rate reforms undertaken by various regulators in different jurisdictions do not have a significant impact on the Group's designated hedging relationships at 31 December 2020. This is because the market data for the main benchmark indices affecting the Group's accounting hedges will continue to be available.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

A breakdown, by type of derivative and for each type of hedge, of the fair value of derivatives designated as hedging instruments at 31 December 2020 and 2019 is as follows:

(in thousands of euros)

ITEM	31/12/2020			31/12/2019		
	Fair value	Amount netted	Carrying amount	Fair value	Amount netted	Carrying amount
Debit balances:						
Fair value hedges	2,932,298	(481,938)	2,450,360	2,952,316	(456,045)	2,496,271
Cash flow hedges	867	-	867	2,550	-	2,550
Total	2,933,165	(481,938)	2,451,227	2,954,866	(456,045)	2,498,821
Credit balances:						
Fair value hedges	554,108	(481,938)	72,170	495,522	(456,045)	39,477
Cash flow hedges	80,980	-	80,980	47,925	-	47,925
Total	635,088	(481,938)	153,150	543,447	(456,045)	87,402

Details, by maturity, of the notional amount of the derivatives classified as hedging derivatives at 31 December 2020 and 2019 are as follows:

(in thousands of euros)

ITEM	Remaining term to maturity as of 31 December 2020			
	0 to 3 years	3 to 10 years	More than 10 years	Total
Interest rate derivatives	8,017,040	11,325,567	8,128,323	27,470,930
Total	8,017,040	11,325,567	8,128,323	27,470,930

(in thousands of euros)

ITEM	Remaining term to maturity as of 31 December 2019			
	0 to 3 years	3 to 10 years	More than 10 years	Total
Interest rate derivatives	5,417,650	15,550,519	8,689,051	29,657,220
Total	5,417,650	15,550,519	8,689,051	29,657,220

Operations of fair value hedges

The following table presents a breakdown, by type of hedged item, of the carrying amount of hedged items and the accumulated amount of fair value hedge adjustments thereon in relation to continuing fair value hedges at 31 December 2020 and 2019:

31 December 2020

(in thousands of euros)

ITEM	31/12/2020		
	Carrying amount of the hedged item	Accumulated amount of fair value hedge adjustments on the hedged item	
Debit balances:			
Fixed rate debt securities	A	7,520,058	346,311 D
Fixed rate loans and advances	B	432,238	4,013
Total		7,952,296	350,324
Credit balances:			
Fixed rate deposits	C	5,772,414	(841,480) E
Fixed rate debt securities issued by the Group	C	9,542,152	(1,638,767) F
Total		15,314,566	(2,480,247)

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31 December 2019

(in thousands of euros)

		31/12/2019		
ITEM		Carrying amount of the hedged item	Accumulated amount of fair value hedge adjustments on the hedged item	
Debit balances:				
Fixed rate debt securities	A	9,355,790	315,539	D
Fixed rate loans and advances	B	90,465	2,685	
Total		9,446,255	318,224	
Credit balances:				
Fixed rate deposits	C	5,949,948	(889,968)	E
Fixed rate debt securities issued by the Group	C	9,427,439	(1,611,260)	F
Total		15,377,387	(2,501,228)	

The hedged item and the fair value hedge adjustment on the hedged item are recognised on the balance sheet under the following line items at 31 December 2020 and 2019:

- A. Financial assets at fair value through other comprehensive income
- B. Financial assets at amortised cost
- C. Financial liabilities at amortised cost

In addition to the accumulated amount of fair value hedge adjustments on hedged items for continuing hedges, also recognised at 31 December 2020 and 2019 is the amount of fair value hedge adjustments of discontinued hedges to be amortised in the hedged items, as detailed below:

- D. Debt securities classified as financial assets at fair value through other comprehensive income at 31 December 2020 in an amount of EUR 137,301 thousand (EUR 6,393 thousand at 31 December 2019).
- E. Deposits classified as financial liabilities at amortised cost at 31 December 2020 in an amount of EUR 44,528 thousand (EUR 65,501 thousand at 31 December 2019).
- F. Debt securities issued classified as financial liabilities at amortised cost at 31 December 2020 in an amount of EUR 127 thousand (EUR 228 thousand at 31 December 2019).

The following table presents a breakdown, by type of derivative, of the fair value and the notional amount of derivatives designated as hedging instruments in fair value hedges at 31 December 2020 and 2019:

ITEM	31/12/2020		
	Notional amount	Carrying amount	
		Debit balances	Credit balances
Interest rate derivatives	21,925,162	2,450,360	72,170
Total	21,925,162	2,450,360	72,170

ITEM	31/12/2019		
	Notional amount	Carrying amount	
		Debit balances	Credit balances
Interest rate derivatives	23,603,741	2,496,271	39,477
Total	23,603,741	2,496,271	39,477

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

The following table presents a breakdown of the change in the fair value of the hedging instrument and the hedged item used as the basis for recognising hedge ineffectiveness in fair value hedges in 2020 and 2019:

31 December 2020

(in thousands of euros)				
ITEM		Gains/(losses) attributable to the hedged risk		Ineffectiveness
Hedged item	Hedging instrument	Hedged item	Hedging instrument	
Debit balances:				
Debt securities	Interest rate derivatives	127,629	(127,762)	(133)
Loans at amortised cost	Interest rate derivatives	(1,595)	1,639	44
Total		126,034	(126,123)	(89)
Credit balances				
Deposits	Interest rate derivatives	46,998	(51,608)	(4,610)
Debt securities issued	Interest rate derivatives	(27,506)	12,962	(14,544)
Total		19,492	(38,646)	(19,154)

31 December 2019

(in thousands of euros)				
ITEM		Gains/(losses) attributable to the hedged risk		Ineffectiveness
Hedged item	Hedging instrument	Hedged item	Hedging instrument	
Debit balances:				
Debt securities	Interest rate derivatives	285,699	(287,924)	(2,225)
Loans at amortised cost	Interest rate derivatives	(680)	614	(66)
Total		285,019	(287,310)	(2,291)
Credit balances				
Deposits	Interest rate derivatives	(22,040)	21,516	(524)
Debt securities issued	Interest rate derivatives	(174,290)	165,574	(8,716)
Total		(196,330)	187,090	(9,240)

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Details, by maturity, of the notional amount of derivatives classified as fair value hedges at 31 December 2020 and 2019 are as follows:

31 December 2020

(in thousands of euros)				
ITEM	Remaining term to maturity as of 31 December 2020			Total
	0 to 3 years	3 to 10 years	More than 10 years	
Debt securities				
Interest rate derivatives	2,415,189	5,096,000	12,400	7,523,589
Loans at amortised cost				
Interest rate derivatives	2,882	40,469	76,860	120,211
Deposits				
Interest rate derivatives	1,941,316	2,048,454	876,600	4,866,370
Debt securities issued				
Interest rate derivatives	3,646,000	3,548,200	2,220,792	9,414,992
Total	8,005,387	10,733,123	3,186,652	21,925,162

31 December 2019

(in thousands of euros)				
ITEM	Remaining term to maturity as of 31 December 2019			Total
	0 to 3 years	3 to 10 years	More than 10 years	
Debt securities				
Interest rate derivatives	890,217	8,136,100	12,400	9,038,717
Loans at amortised cost				
Interest rate derivatives	8,965	48,385	81,468	138,818
Deposits				
Interest rate derivatives	1,760,846	2,373,454	876,600	5,010,900
Debt securities issued				
Interest rate derivatives	2,646,000	4,548,200	2,221,106	9,415,306
Total	5,306,028	15,106,139	3,191,574	23,603,741

Operations of cash flow hedges

All cash flow hedges are micro-hedges, and therefore the hedged item perfectly matches the hedging derivative. As a result, in 2020 and 2019, there was no ineffectiveness that, according to applicable regulations, required recognition on the Group's income statement for those years.

The table below presents a breakdown, by type of hedged item, of the change in the carrying amount of the hedged item in the year and of the cash flow hedge reserve (effective portion) for cash flow hedges at 31 December 2020 and 2019:

31 December 2020

(in thousands of euros)					
ITEM		Change in value of the hedged item used as the basis for recognising hedge ineffectiveness in the year	Cash flow hedge reserve		
			Continuing hedges	Discontinued hedges	
Debit balances:					
Floating rate debt securities (*)	A		6,165	525	-
Floating rate loans and advances (*)	B		896	315	(5,215)
Total			7,061	840	(5,215)

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31 December 2019

(in thousands of euros)

ITEM		Change in value of the hedged item used as the basis for recognising hedge ineffectiveness in the year	Cash flow hedge reserve	
			Continuing hedges	Discontinued hedges
Debit balances:				
Floating rate debt securities (*)	A	(9,016)	(5,641)	-
Floating rate loans and advances (*)	B	863	322	(6,118)
Total		(8,153)	(5,319)	(6,118)

(*) Not taking into consideration the related tax effect.

At 31 December 2020 and 2019, the hedged items were recognised under Financial assets at amortised cost.

Details, by class of derivative, of the fair value, notional amount, change in fair value of the hedging instrument used as the basis for recognising ineffectiveness in the year, the ineffectiveness recognised in the year, and the amount reclassified due to the cash flow hedge adjustment in cash flow hedges at 31 December 2020 and 2019 are as follows:

31 December 2020

(in thousands of euros)

ITEM	Notional amount	Carrying amount		Change in value of the hedging instrument used as the basis for recognising hedge ineffectiveness in the year		Amount reclassified to profit or loss		
		Debit balances	Credit balances	Total	Effective portion Accumulated other comprehensive income (*)	Ineffectiveness Gains or (-) losses from hedge accounting, net	Net interest income	Gains or (-) losses from hedge accounting, net
Interest rate derivatives	5,545,768	867	80,980	7,061	7,061	-	-	-
Total	5,545,768	867	80,980	7,061	7,061	-	-	-

31 December 2019

(in thousands of euros)

ITEM	Notional amount	Carrying amount		Change in value of the hedging instrument used as the basis for recognising hedge ineffectiveness in the year		Amount reclassified to profit or loss		
		Debit balances	Credit balances	Total	Effective portion Accumulated other comprehensive income (*)	Ineffectiveness Gains or (-) losses from hedge accounting, net	Net interest income	Gains or (-) losses from hedge accounting, net
Interest rate derivatives	6,053,479	2,550	47,925	(8,153)	(8,153)	-	-	-
Total	6,053,479	2,550	47,925	(8,153)	(8,153)	-	-	-

(*) Not taking into consideration the related tax effect.

Details of the estimated term as of 31 December 2020 and 2019 after which the amounts recognised in “Equity – Accumulated other comprehensive income – Items that may be reclassified to profit or loss – Hedging derivatives. Cash flow hedges [effective portion]” at that date are expected to be recognised in future income statements are as follows:

(in thousands of euros)

ITEM	Remaining term to maturity as of 31 December 2020				TOTAL
	Less than 1 year	Between 1 and 3 years	Between 3 and 5 years	More than 5 years	
Losses (*)	-	(231)	(645)	(2,754)	(3,630)
Gains (*)	-	278	173	116	567
Total	-	47	(472)	(2,638)	(3,063)

(*) Taking into consideration the related tax effect.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(in thousands of euros)

ITEM	Remaining term to maturity as of 31 December 2019				TOTAL
	Less than 1 year	Between 1 and 3 years	Between 3 and 5 years	More than 5 years	
Losses (*)	-	(374)	(2,253)	(7,529)	(10,156)
Gains (*)	1,551	400	119	80	2,150
Total	1,551	26	(2,134)	(7,449)	(8,006)

(*) Taking into consideration the related tax effect.

Details, by maturity, of the notional amount and average fixed interest of derivatives classified as cash flow hedges at 31 December 2020 and 2019 are as follows:

31 December 2020

(in thousands of euros)

ITEM	Remaining term to maturity as of 31 December 2020			Total
	Between 0 and 3 years	Between 3 and 10 years	More than 10 years	
Interest rate derivatives				
Notional amount	11,653	592,444	4,941,671	5,545,768
Average fixed interest rate (%)	2.756	1.177	0.284	0.384
Total	11,653	592,444	4,941,671	5,545,768

31 December 2019

(in thousands of euros)

ITEM	Remaining term to maturity as of 31 December 2019			Total
	Between 0 and 3 years	Between 3 and 10 years	More than 10 years	
Interest rate derivatives				
Notional amount	111,622	444,380	5,497,477	6,053,479
Average fixed interest rate (%)	0.658	1.325	0.248	0.335
Total	111,622	444,380	5,497,477	6,053,479

(14) Investments in subsidiaries, joint ventures and associates

(14.1) Changes in the Group's composition

Other than as disclosed in Note 1.15, there were no significant changes in the Group's composition or the scope of consolidation in 2020.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(14.2) Investments in joint ventures and associates

The breakdown of the investments under this heading on the accompanying consolidated balance sheets is as follows:

(in thousands of euros)		
ENTITY	31/12/2020	31/12/2019
Caja Granada Vida, Compañía de Seguros y Reaseguros, S.A.	-	21,871
Cajamurcia Vida y Pensiones de Seguros y Reaseguros, S.A.	-	12,870
Gramina Homes, S.L.	120,100	133,422
CACF Bankia Consumer Finance, EFC, S.A.	18,921	9,034
Redsys Servicios de Procesamiento, S.L.	11,241	11,020
Bankia Mapfre Vida, S.A., de Seguros y Reaseguros	198,721	144,350
Finweg, S.L.	181	-
Billib, S.L.	928	928
Sum	350,092	333,495
Goodwill	118,446	121,407
Total	468,538	454,902

During 2020 the merger by absorption of Caja Granada Vida, Compañía de Seguros y Reaseguros, S.A. and Cajamurcia Vida y Pensiones de Seguros y Reaseguros, S.A. (absorbed companies) into Bankia Mapfre Vida, S.A., de Seguros y Reaseguros (absorbing company) was carried out, with no significant impact on the Group's consolidated equity (see Note 1.15).

As explained in Note 2.16.1, the cash-generating units to which goodwill has been allocated are periodically tested for impairment, to which end the goodwill allocated is included in their carrying amount. Impairment tests are carried out at least annually, or whenever there is any indication that an asset may be impaired.

At 31 December 2020, goodwill amounting to EUR 118,107 thousand corresponds to the cash-generating unit composed of the insurance and life insurance company Bankia Mapfre Vida, S.A. de Seguros y Reaseguros. At 31 December 2019, this goodwill from the cash-generating unit composed of the life insurance companies – comprising the investment in Bankia Mapfre Vida, S.A. de Seguros y Reaseguros, Caja Granada Vida Compañía de Seguros y Reaseguros, S.A. and Cajamurcia Vida y Pensiones de Seguros y Reaseguros, S.A. – amounted to EUR 121,407 thousand.

Based on the analysis performed, using up-to-date relevant information available on the performance of the cash-generating unit that could reveal indications of impairment, the Directors have concluded that at 31 December 2020 there was no decline in value that required the recognition of further impairment in addition to that recorded on the consolidated balance sheet at that date.

The banking-insurance agreements that the Group has entered into with Mapfre include certain safeguards agreed between the parties that are customary in this type of agreement in contingent situations. These consider, inter alia, that in the event of a change in control in Bankia's shareholder structure, Mapfre has an exit option, the terms of which have been agreed by the parties. This issue had no impact on the consolidated financial statements at 31 December 2020 (see Note 1.1.17).

Summary financial information for the main companies at 31 December 2020 and 2019 is as follows:

(in thousands of euros)				
ITEM	31/12/2020(*)			
	Gramina Homes, S.L.	CACF Bankia Consumer Finance, EFC, S.A.	Redsys Servicios de Procesamiento, S.L.	Bankia Mapfre Vida, S.A., de Seguros y Reaseguros
Dividends received	-	-	-	24,976
Current assets	615,667	24,043	19,378	113,372
Non-current assets	9,489	132,183	80,522	8,269,993
Current liabilities	24,004	7,267	23,491	547,002
Non-current liabilities	654	110,345	5,880	7,430,807
Ordinary income	91,368	140	144,577	180,385
Profit or (-) loss from continuing operations	(19,650)	(13,482)	1,797	128,742
Other comprehensive income	-	-	-	(32,427)
Total comprehensive income	(19,650)	(13,482)	1,797	96,315

(*) Latest available data, unaudited.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(in thousands of euros)

ITEM	31/12/2019(*)					
	Caja Granada Vida, Compañía de Seguros y Reaseguros, S.A.	Cajamurcia Vida y Pensiones de Seguros y Reaseguros, S.A.	Gramina Homes, S.L.	CACF Bankia Consumer Finance, EFC, S.A.	Redsys Servicios de Procesamiento, S.L.	Bankia Mapfre Vida, S.A., de Seguros y Reaseguros
Dividends received	7,167	8,578	-	-	-	52,489
Current assets	7,427	14,544	692,744	4,980	31,447	92,535
Non-current assets	277,974	117,473	610	17,111	93,990	8,366,835
Current liabilities	14,437	2,001	25,403	3,651	48,584	550,056
Non-current liabilities	226,329	103,751	843	3	7,712	7,614,723
Ordinary income	18,878	23,681	23,127	284	192,620	239,379
Profit or (-) loss from continuing operations	5,104	5,297	(5,151)	(7,849)	9,376	96,765
Other comprehensive income	2,786	1,995	-	-	-	29,928
Total comprehensive income	7,890	7,292	(5,151)	(7,849)	9,376	126,693

(*) Latest available data, unaudited.

The reconciliation of this information with the carrying amount of the investment is as follows:

(in thousands of euros)

ITEM	Gramina Homes, S.L.	CACF Bankia Consumer Finance, EFC, S.A.	Redsys Servicios de Procesamiento, S.L.	Bankia Mapfre Vida, S.A., de Seguros y Reaseguros
Adjusted equity of the Company	600,498	38,613	70,529	405,556
Interest attributable to the parent	20%	49%	16%	49%
Adjusted equity attributable to the parent	120,100	18,921	11,285	198,722
Value of investment as per consolidated (*)	120,100	18,921	11,285	198,722

(*) Latest available data, unaudited.

(in thousands of euros)

ITEM	31/12/2019(*)					
	Caja Granada Vida, Compañía de Seguros y Reaseguros, S.A.	Cajamurcia Vida y Pensiones de Seguros y Reaseguros, S.A.	Gramina Homes, S.L.	CACF Bankia Consumer Finance, EFC, S.A.	Redsys Servicios de Procesamiento, S.L.	Bankia Mapfre Vida, S.A., de Seguros y Reaseguros
Adjusted equity of the Company	44,635	26,266	667,108	18,437	69,142	294,591
Interest attributable to the parent	49%	49%	20%	49%	16%	49%
Adjusted equity attributable to the parent	21,871	12,870	133,422	9,034	11,020	144,350
Value of investment as per consolidated	21,871	12,870	133,422	9,034	11,020	144,350

(*) Goodwill is not considered in the carrying amount.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(15) Tangible assets

Details of this item on the accompanying consolidated balance sheets are as follows:

(in thousands of euros)

ITEM	For own use	Investment property	Total	Of which: Acquired under a lease
Cost				
Balances at 31/12/2019	5,330,294	681,035	6,011,329	566,460
Additions/disposals (net) ⁽¹⁾	(2,495)	(47,813)	(50,308)	41,412
Transfer to non-current assets held for sale and other movements	(30,470)	59,679	29,209	-
Balances at 31/12/2020	5,297,329	692,901	5,990,230	607,872
Accumulated depreciation				
Balances at 31/12/2019	(3,088,261)	(31,648)	(3,119,909)	(61,597)
Additions/disposals (net)	78,352	1,901	80,253	3,527
Depreciation for the year (Note 40)	(141,433)	(4,756)	(146,189)	(65,482)
Transfer to non-current assets held for sale and other movements	13,020	259	13,279	-
Balances at 31/12/2020	(3,138,322)	(34,244)	(3,172,566)	(123,552)
Impairment losses				
Balances at 31/12/2019	(106,045)	(168,085)	(274,130)	-
Net provision/(release) charged/(credited) to the income statement (Note 43)	-	(15,786)	(15,786)	-
Transfer to non-current assets held for sale and other movements	(570)	(9,053)	(9,623)	-
Balances at 31/12/2020	(106,615)	(192,924)	(299,539)	-
Total at 31 December 2019	2,135,988	481,302	2,617,290	504,863
Total at 31 December 2020	2,052,392	465,733	2,518,125	484,320

(1) Additions to own use and investment property in 2020 amounted to EUR 81,954 thousand and EUR 148 thousand, respectively.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(in thousands of euros)

ITEM	For own use	Investment property	Total	Of which: Acquired under a lease
Cost				
Balances at 31/12/2018	4,764,217	725,363	5,489,580	-
Additions/disposals (net)*	614,953	(43,029)	571,924	566,460
Transfer to non-current assets held for sale and other movements	(48,876)	(1,299)	(50,175)	-
Balances at 31/12/2019	5,330,294	681,035	6,011,329	566,460
Accumulated depreciation				
Balances at 31/12/2018	(2,979,436)	(29,640)	(3,009,076)	-
Additions/disposals (net)	18,791	1,794	20,585	-
Depreciation for the year (Note 40)	(141,208)	(5,163)	(146,371)	(61,597)
Transfer to non-current assets held for sale and other movements	13,592	1,361	14,953	-
Balances at 31/12/2019	(3,088,261)	(31,648)	(3,119,909)	(61,597)
Impairment losses				
Balances at 31/12/2018	(115,462)	(175,349)	(290,811)	-
Net provision/(release) charged/(credited) to the income statement (Note 43)	22	(14,566)	(14,544)	-
Transfer to non-current assets held for sale and other movements	9,395	21,830	31,225	-
Balances at 31/12/2019	(106,045)	(168,085)	(274,130)	-
Total at 31 December 2018	1,669,319	520,374	2,189,693	-
Total at 31 December 2019	2,135,988	481,302	2,617,290	504,863

* Includes the impact of the first-time application of IFRS 16 amounting to EUR 615,629 thousand.

The recoverable amount of the assets at 31 December 2020 and 2019 exceeded their carrying amount.

(15.1) Tangible assets – Property, plant and equipment – For own use

Details of this heading on the accompanying consolidated balance sheets, by type of asset, are as follows:

31 December 2020

(in thousands of euros)

ITEM	Cost	Accumulated depreciation	Impairment losses	Carrying amount
Buildings and other structures	2,361,574	(531,967)	(55,005)	1,774,602
Furniture and vehicles	210,153	(185,445)	-	24,708
Fixtures	1,551,025	(1,305,741)	(51,610)	193,674
Office equipment and machinery	1,174,577	(1,115,169)	-	59,408
Balances at 31 December 2020	5,297,329	(3,138,322)	(106,615)	2,052,392

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31 December 2019

(in thousands of euros)

ITEM	Cost	Accumulated depreciation	Impairment losses	Carrying amount
Buildings and other structures	2,344,487	(463,867)	(54,435)	1,826,185
Furniture and vehicles	217,911	(190,036)	-	27,875
Fixtures	1,600,983	(1,329,171)	(51,610)	220,202
Office equipment and machinery	1,166,913	(1,105,187)	-	61,726
Balances at 31 December 2019	5,330,294	(3,088,261)	(106,045)	2,135,988

At 31 December 2020 and 2019, there were no items of property, plant and equipment for own use of significant amounts which were:

- Temporarily idle.
- Fully depreciated but still in use.
- Retired from active use but not classified as non-current assets held for sale.

(15.2) Tangible assets – Investment property

“Investment property” includes land, buildings and other structures held either to earn rentals or for capital appreciation.

At 31 December 2020 and 2019, the Group did not have any significant contractual obligations in connection with the future operation of the investment property included on the consolidated balance sheet at those dates, and there were no relevant restrictions thereon, other than those inherent to the current conditions of the property market.

During the year ended 31 December 2020 net income from the Group’s investment property totalled EUR 16,377 thousand (EUR 20,411 thousand at 31 December 2019) (see Note 36).

(16) Intangible assets

(16.1) Goodwill

The breakdown of goodwill included under “Intangible assets” on the accompanying consolidated balance sheets, by company, is as follows:

(in thousands of euros)

ENTITY	31/12/2020	31/12/2019
Bankia Pensiones, S.A. Entidad Gestora de Fondos de Pensiones	86,062	88,462
Total	86,062	88,462

Movement (gross amount) in goodwill recognised under this item on the consolidated balance sheet in the years ended 31 December 2020 and 2019 was as follows:

(in thousands of euros)

ITEM	31/12/2020	31/12/2019
Opening balance	88,462	90,862
Provision charged to the income statement (Note 43)	(2,400)	(2,400)
Closing balance	86,062	88,462

As explained in Note 2.16.1, the cash-generating units to which goodwill has been allocated are periodically tested for impairment, to which end the goodwill allocated is included in their carrying amount. Impairment tests are carried out at least annually, or whenever there is any indication that an asset may be impaired.

Based on the analysis performed, using up-to-date relevant information available on the performance of the cash-generating unit that could reveal indications of impairment, the Directors have concluded that at 31 December 2020 there was no decline in value that required the recognition of further impairment in addition to that recorded on the consolidated balance sheet at that date.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(16.2) Other intangible assets

The breakdown of assets under this heading on the accompanying consolidated balance sheets is as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
With finite useful life		
Computer software	1,464,596	1,314,337
Other	1,227	453
(Accumulated amortisation)	(1,046,336)	(1,001,448)
Total assets net of amortisation	419,487	313,342
Impairment losses	(315)	(398)
Total	419,172	312,944

Movement in this consolidated balance sheet heading during the years ended 31 December 2020 and 2019 was as follows:

(in thousands of euros)		
ITEM	2020	2019
With finite useful life		
Opening balance	312,944	206,692
Additions	154,866	163,373
Amortisation charged to the income statement (Note 40)	(49,183)	(54,581)
Derecognition due to disposal or other	-	(3,684)
Other changes	545	1,144
Closing balance	419,172	312,944
Total	419,172	312,944

(17) Other assets

Details of the balances under this consolidated balance sheet item at 31 December 2020 and 2019 are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Insurance contracts linked to pensions (Note 38.2)	643,579	1,061,912
Other items	293,166	539,491
Total	936,745	1,601,403

“Other items” mainly reflect transactions in transit, accruals associated with operating income, and unaccrued prepayments.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(18) Non-current assets and disposal groups classified as held for sale

(18.1) Breakdown

Details of this heading on the accompanying consolidated balance sheets at 31 December 2020 and 2019 are as follows:

31 December 2020

(in thousands of euros)			
ITEM	Cost	Impairment losses	Carrying amount
Non-current assets held for sale	2,296,843	(650,957)	1,645,886
Property, plant and equipment for own use	237,744	(60,964)	176,780
Real estate assets foreclosed or received in payment of debt	1,938,725	(589,400)	1,349,325
Other equity instruments	119,164	-	119,164
Investments in joint ventures and associates	1,210	(593)	617
Assets included in disposal groups and discontinued operations	83,027	(68,344)	14,683
Total assets at 31 December 2020	2,379,870	(719,301)	1,660,569
Liabilities included in disposal groups and discontinued operations	1,383	-	1,383
Total liabilities at 31 December 2020	1,383	-	1,383

31 December 2019

(in thousands of euros)			
ITEM	Cost	Impairment losses	Carrying amount
Non-current assets held for sale	2,261,030	(574,551)	1,686,479
Property, plant and equipment for own use	232,334	(63,953)	168,381
Real estate assets foreclosed or received in payment of debt	1,774,326	(510,356)	1,263,970
Other equity instruments	134,919	-	134,919
Investments in joint ventures and associates	119,451	(242)	119,209
Assets included in disposal groups and discontinued operations	639,897	(174,777)	465,120
Total assets at 31 December 2019	2,900,927	(749,328)	2,151,599
Liabilities included in disposal groups and discontinued operations	3,657	-	3,657
Total liabilities at 31 December 2019	3,657	-	3,657

(18.2) Property, plant and equipment for own use

At 31 December 2020 and 2019, this item basically comprises certain buildings for the Group's own use which have ceased to form part of its branch network and which, pursuant to current regulations, satisfy the requirements for recognition as non-current assets held for sale, given the existence of a detailed plan for their sale.

As described in Note 2.20, the Group measures these assets at the lower of their carrying amount and their fair value less cost to sell, and in 2020 impairment of EUR 5,660 thousand was recognised thereon (EUR 825 thousand in 2019).

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(18.3) Real estate assets foreclosed or received in payment of debt

This item includes assets foreclosed or received in payment of debt, for the full or partial settlement of debtors' payment obligations vis-à-vis the Group, which are considered non-current assets held for sale and are recognised and measured as indicated in Note 2.20, unless the Group has decided to make continuing use of the assets or to hold them to earn rentals and/or for future capital appreciation, in which case they are recognised and measured as described in Note 2.15.

The breakdown of assets foreclosed or received in payment of debt recognised on the Group's accompanying consolidated balance sheets is as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Real estate assets		
Completed housing	918,563	821,837
Managed rural property and finished offices, commercial and industrial premises	296,711	314,163
Land parcels, undeveloped land and other assets	134,051	127,970
Total	1,349,325	1,263,970

Significant changes

The changes recognised in these assets in 2020 and 2019 are as follows:

(in thousands of euros)		
ITEM	2020	2019
Carrying amount at beginning of year	1,263,970	1,708,400
Additions during the year	327,419	279,760
Disposals during the year	(134,310)	(475,268)
Net impairment losses	(133,201)	(201,435)
Other changes	25,447	(47,487)
Carrying amount at year end	1,349,325	1,263,970

Sales of foreclosed assets are made on an arm's length basis. In 2020, financing was granted for an amount of approximately EUR 60.5 million. On average, 92.4% of the sales amount was financed (EUR 87 million and 90.4% in 2019).

Proceeds from disposals of foreclosed assets, by type, in the years ended 31 December 2020 and 2019 were as follows:

31 December 2020

(in thousands of euros)		
ITEM	Disposal of assets at carrying amount	Gain/(loss) recognised on disposal (*)
Completed housing	106,109	12,663
Managed rural property and finished offices, commercial and industrial premises	19,772	3,749
Land parcels, undeveloped land and other assets	8,429	5,811
Total	134,310	22,223

(*) Excludes fees paid to intermediaries.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31 December 2019

(in thousands of euros)

ITEM	Disposal of assets at carrying amount	Gain/(loss) recognised on disposal (*)
Completed housing	341,239	7,883
Managed rural property and finished offices, commercial and industrial premises	106,160	6,493
Land parcels, undeveloped land and other assets	27,869	6,271
Total	475,268	20,647

(*) Excludes fees paid to intermediaries.

Appendix IX provides further details of the Group's real estate assets at 31 December 2020 and 2019, including the foreclosed assets referred to in the preceding table.

Moreover, the table below shows the carrying amount of the foreclosed assets at 31 December 2020 and 2019, by their estimated ages as of the date of recognition on the balance sheet:

(in thousands of euros)

Age of foreclosed assets	31/12/2020	31/12/2019
Up to 12 months	148,433	84,123
More than 12 months but not more than 24 months	158,685	134,736
More than 24 months	1,042,207	1,045,111
TOTAL	1,349,325	1,263,970

The table below presents details of the gross amount of real estate assets foreclosed or received in payment of debt (business in Spain) at 31 December 2020 and 2019 classified, according to their ultimate purpose, as "Non-current assets held for sale" and "Tangible assets – Investment property" on the consolidated balance sheet at those dates, excluding those classified as disposal groups (see Note 18.5.1):

(in thousands of euros)

ITEM	31/12/2020	31/12/2019
Real estate assets deriving from financing for real estate construction and property development	322,975	307,558
Completed buildings	145,952	141,167
Buildings under construction	31,808	21,857
Land	145,215	144,534
Real estate assets deriving from mortgage-secured financing granted to households for housing purchases	1,545,656	1,391,317
Other real estate assets received in payment of debt	643,355	634,682

Appendix IX provides information on exposure to the real estate construction and property development sector in Spain, including information on assets foreclosed or received in payment of debt, including the real estate assets presented in the preceding table.

(18.4) Other equity instruments and investments in joint ventures and associates

These items include the balances of investments in joint ventures and associates, and other equity instruments previously recognised under "Financial assets at fair value through other comprehensive income" that the Group has reclassified to "Non-current assets held for sale" (see Note 2.20). The following table shows a breakdown of the balance by item under which the investment was recognised before its classification under "Non-current assets held for sale":

(in thousands of euros)

ITEM	31/12/2020	31/12/2019
Financial assets at fair value through other comprehensive income	119,164	134,919
Investments in joint ventures and associates – Joint ventures	17	20
Investments in joint ventures and associates – Associates	600	119,189
TOTAL	119,781	254,128

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

At 31 December 2019, "Investments in joint ventures and associates – Associates" included the investment in Caser amounting to EUR 118,242 thousand, which was derecognised in the first half of 2020 once the sale described in Note 1.15 was closed.

The table below shows the movement in the impairment of investments in joint ventures and associates for the years ended 31 December 2020 and 2019:

31 December 2020

(in thousands of euros)

ITEM	Joint ventures	Associates	TOTAL
Opening balance	-	(242)	(242)
Allowances and other movement	-	(351)	(351)
Total	-	(593)	(593)

31 December 2019

(in thousands of euros)

ITEM	Joint ventures	Associates	TOTAL
Opening balance	-	(1,215)	(1,215)
Allowances and other movement	-	973	973
Total	-	(242)	(242)

Appendix IV provides additional information on joint ventures and associates classified under "Non-current assets and disposal groups classified as held for sale".

(18.5) Assets and liabilities included in disposal groups and discontinued operations

A disposal group is defined as a group of assets, with some directly associated liabilities, which will be disposed of in a single transaction. The Group has classified these disposal groups as non-current assets held for sale since they meet the requirements for classification as "Non-current assets held for sale". Therefore, the assets and liabilities are presented and measured in accordance with the criteria established for "Disposal groups" (see Note 2.20).

31 December 2020

(in thousands of euros)

ITEM	Cost or Gross value	Impairment losses	Carrying amount
Assets			
Disposal groups	83,027	(68,344)	14,683
Loan and real estate assets portfolio	82,086	(68,344)	13,742
Group entities - Assets	941	-	941
Total assets at 31 December 2020	83,027	(68,344)	14,683
Liabilities			
Disposal groups	1,383	-	1,383
Group entities - Liabilities	1,383	-	1,383
Total liabilities at 31 December 2020	1,383	-	1,383

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31 December 2019

(in thousands of euros)			
ITEM	Cost or Gross value	Impairment losses	Carrying amount
Assets			
Disposal groups	639,897	(174,777)	465,120
Loan and real estate assets portfolio	622,592	(174,777)	447,815
Group entities - Assets	17,305	-	17,305
Total assets at 31 December 2019	639,897	(174,777)	465,120
Liabilities			
Disposal groups	3,657	-	3,657
Group entities - Liabilities	3,657	-	3,657
Total liabilities at 31 December 2019	3,657	-	3,657

(18.5.1) Loan and real estate assets portfolio

This item includes certain portfolios of loans and credits, and of real estate assets, considered as disposal groups classified as held for sale, since the carrying amounts of these portfolios will be recovered through a highly probable sale within a period of one year from the date of their classification as non-current assets held for sale. The assets were measured on the Group's consolidated balance sheet at 31 December 2020 and 2019 at their estimated selling price less expected costs. This did not have a significant impact on the Group's consolidated income statement.

Taking into account the circumstances and uncertainties set out in Note 1.16 to these consolidated financial statements, the Group reassessed the probability of realisation of the portfolios that have not been sold at 31 December 2020 within one year of their accounting classification. This entailed the reclassification of loans and credits classified as non-current assets held for sale at 31 December 2019 to financial assets at amortised cost, in a gross amount of approximately EUR 306 million, and foreclosed assets, in a gross amount of approximately EUR 180 million, which did not have a significant impact on the Group's consolidated income statement.

Details, by type of transaction, of the balance of this item on the accompanying consolidated balance sheet are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Loans	69,911	356,068
Property, plant and equipment for own use	-	702
Foreclosed assets	12,175	265,822
Gross value	82,086	622,592
Impairment losses	(68,344)	(174,777)
Carrying amount	13,742	447,815

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

At 31 December 2020, all loans are non-performing assets. In addition, other variations have arisen in the balance of this item, due mainly to the performance and current management of such assets (repayments collected, variations associated with the recovery process, foreclosures or assets received in payment of debt, sales of foreclosed assets, etc.).

Real estate assets portfolio

The breakdown of real estate assets at 31 December 2020 and 2019, by classification on the consolidated balance sheet and type of asset, is as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Property, plant and equipment for own use	-	702
Foreclosed assets	12,175	265,822
Completed housing - borrower's primary residence	10,519	227,297
Managed rural property and finished offices, commercial and industrial premises	1,556	25,875
Land parcels and other real estate assets	100	12,650
Total	12,175	266,524

The following table provides a breakdown of the gross balance at 31 December 2020 and 2019 of real estate assets foreclosed or received in payment of debt (business in Spain) classified as a disposal group:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Real estate assets deriving from financing for real estate construction and property development	529	29,328
Completed buildings	529	17,957
Buildings under construction	-	214
Land	-	11,157
Real estate assets deriving from mortgage-secured financing granted to households for housing purchases	9,721	199,603
Other real estate assets received in payment of debt	1,925	37,647

Appendix IX provides information on exposure to the real estate construction and property development sector in Spain, including information on assets foreclosed or received in payment of debt, including the real estate assets presented in the preceding table.

(18.5.2) Subsidiaries – Assets and liabilities

The following table shows a breakdown of the subsidiaries that qualify for classification as “disposal groups” whose assets and liabilities are, therefore, presented as “Non-current assets and disposal groups classified as held for sale” and “Liabilities included in disposal groups classified as held for sale”:

Company	% ownership	
	31/12/2020	31/12/2019
Corporación Financiera Habana, S.A., in liquidation	-	60.00
Gestión y Recaudación Local, S.L.	99.75	99.75

The table below shows a breakdown at 31 December 2020 and 2019 of the assets and liabilities corresponding to these companies, by line item on the consolidated balance sheet under which they were recognised before classification as non-current assets held for sale:

(in thousands of euros)					
	31/12/2020	31/12/2019		31/12/2020	31/12/2019
Cash, cash balances at central banks and other demand deposits	3	1	Financial liabilities at amortised cost	155	2,365
Financial assets at amortised cost	774	12,949	Provisions	1,228	1,228
Tangible assets	3	4	Other liabilities	-	64
Intangible assets	82	118			
Other assets	79	4,233			
TOTAL ASSETS	941	17,305	TOTAL LIABILITIES	1,383	3,657

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Appendix II contains additional information concerning these subsidiaries.

(19) Financial liabilities at amortised cost

Breakdown

Details, by counterparty and type of transaction, of this item on the accompanying consolidated balance sheets are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Financial liabilities at amortised cost		
Deposits from central banks	23,041,190	13,937,693
Deposits from credit institutions	14,827,460	26,466,157
Deposits from customers	127,361,914	123,624,577
Debt securities issued	17,273,366	17,626,191
Other financial liabilities	2,439,672	1,442,568
Sum	184,943,602	183,097,186
Valuation adjustments	2,126,272	2,079,068
Total	187,069,874	185,176,254

Financial liabilities at amortised cost – Deposits – Central banks

Details of this item on the accompanying consolidated balance sheets are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Bank of Spain / European Central Bank	23,041,190	13,937,693
Sum	23,041,190	13,937,693
Valuation adjustments	(141,358)	(128,937)
Total	22,899,832	13,808,756

These deposits from central banks are taken using the credit policy with a securities pledge Bankia has set up in the central bank, which enables it to raise immediate liquidity (see Note 3.2).

This line item on the accompanying balance sheet, within the framework of the programmes designed by the European Central Bank (TLTRO) to improve long-term funding, includes EUR 22,918,950 thousand from TLTRO III with an average maturity of 2 years and 4 months at 31 December 2020 (EUR 9,166,970 thousand from TLTRO II with an average maturity of 6 months and EUR 4,583,790 thousand from TLTRO III with an average maturity of 3 years at 31 December 2019).

Regarding finance raised under the framework of the TLTRO programme, the Bank considers that in view of the growth in eligible loans up to 31 December 2020, it will meet the requirements to receive the incentive envisaged in the terms of the programme (see Note 3.2). As a result, the Bank recognised EUR 159,682 thousand in the year ended 31 December 2020 (EUR 56,141 thousand in 2019) under “Interest income” in the income statement (see Note 26).

Financial liabilities at amortised cost – Deposits – Credit institutions

Details of this item on the accompanying consolidated balance sheets, by type of transaction, are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Time deposits	3,090,277	3,712,983
Repos	8,892,105	19,593,061
Other accounts	2,845,078	3,160,113
Sum	14,827,460	26,466,157
Valuation adjustments	6,585	(5,672)
Total	14,834,045	26,460,485

The annual average effective interest rate on deposits from credit institutions at 31 December 2020 was 0.24% (0.25% at 31 December 2019).

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Financial liabilities at amortised cost – Deposits – Customers

Details of this item on the accompanying consolidated balance sheets, by type of transaction, are as follows:

(in thousands of euros)			
ITEM	31/12/2020	31/12/2019	
General government	5,443,813	4,778,218	
Current accounts	5,388,481	4,249,765	
Time deposits	55,332	528,453	
Other financial corporations	11,578,643	12,608,848	
Current accounts	5,231,087	4,926,023	
Time deposits	6,299,531	7,637,299	
Repos	48,025	45,526	
Non-financial corporations	15,126,091	13,334,595	
Current accounts	14,849,927	12,167,650	
Time deposits	276,164	1,166,945	
Households	96,310,984	94,063,075	
Current accounts	76,051,254	67,515,663	
Time deposits	20,259,730	26,547,412	
Total	128,459,531	124,784,736	

This consolidated balance sheet item includes one-off non-marketable covered bonds issued by the Group amounting to EUR 4,817,108 thousand at 31 December 2020 (EUR 5,235,025 thousand at 31 December 2019) (see Appendix VIII).

The annual average effective interest rate of these instruments at 31 December 2020 was 0.07% (0.09% at 31 December 2019).

Financial liabilities at amortised cost – Debt securities issued

Details of issues recognised under this heading on the consolidated balance sheet at 31 December 2020 and 2019 are presented in Appendix VI.

Interest accrued on subordinated liabilities in the year ended 31 December 2020 amounted to EUR 62,190 thousand (EUR 73,428 thousand at 31 December 2019), recognised under "Interest expenses" in the consolidated income statement.

The coupons accrued on the issuance of contingent convertible bonds (convertible into ordinary shares of Bankia) have been recognised in the Group's equity as they are payable at the Entity's discretion. In 2020 EUR 76,888 thousand was recognised in consolidated equity in this respect (EUR 53,803 thousand in 2019).

The annual average effective interest rate of debt securities issued at 31 December 2020 was 1.12% (1.11% at 31 December 2019).

Issues, repurchases and redemptions of debt securities

The table below shows information on total issues, repurchases and redemptions of debt securities in the years ended 31 December 2020 and 2019:

31 December 2020

(in thousands of euros)					
TYPE OF ISSUE	31/12/2019	Issues	Redemptions	Valuation adjustments, treasury shares and others	31/12/2020
Debt securities issued in an EU Member State requiring a prospectus to be registered.	18,679,709	-	(323,002)	80,087	18,436,794
Total	18,679,709	-	(323,002)	80,087	18,436,794

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31 December 2019

(in thousands of euros)

TYPE OF ISSUE	31/12/2018	Issues	Redemptions	Valuation adjustments, treasury shares and others	31/12/2019
Debt securities issued in an EU Member State requiring a prospectus to be registered.	18,360,095	4,135,000	(3,986,237)	170,851	18,679,709
Total	18,360,095	4,135,000	(3,986,237)	170,851	18,679,709

The main issues and redemptions in 2020 were as follows:

On 2 July 2020, the “Bankia Public-Sector Covered Bond 2020-1” issuance was placed for EUR 900 million, the full amount of which is held under treasury shares (see note 3.2).

Appendices VI and VII provide details of the issuances comprising the consolidated balance sheet item “Debt securities issued”, along with the issues, repurchases and redemptions of debt securities carried out by the Bank or other Group companies in 2020 and 2019.

Other information

In terms of seniority, the subordinated bonds rank junior to the claims held by all general creditors over the issuing entities.

The subordinated bond issues recognised under “Financial liabilities at amortised cost” at 31 December 2020 include an option for the issuer to early redeem the securities after (at least) five years have elapsed since the date of disbursement, subject to prior authorisation by the Bank of Spain or, as appropriate, the competent authority, provided it meets the requirements of Regulation (EU) No 575/2013 and Directive 2013/36/EU. In addition, in compliance with regulatory requirements, authorisation may be given to the Group for the full early redemption at any time in the following circumstances: i) in the event of a significant and unforeseen change in the applicable tax treatment of the instruments, and ii) in the event of an unforeseen change, and with sufficient certainty, in the regulatory classification of the instruments that would likely result in their exclusion as capital.

The contingent convertible bonds, convertible into Bankia ordinary shares, targeted solely at professional investors, carry remuneration, payment of which is subject to certain terms and is discretionary. They are perpetual securities, although they can be redeemed at Bankia's discretion in the circumstances contemplated in the associated terms and conditions. Regardless, they will convert into ordinary new-issue Bankia shares if Bankia or the Group presents a Common Equity Tier 1 capital ratio, calculated as set out in Regulation (EU) 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms, of less than 5.125%.

Issues of medium term notes are guaranteed by the issuing Group entities or are secured by restricted deposits.

Covered bonds were issued in accordance with Mortgage Market Law 2/1981, of 25 March, regulating the mortgage market, and the related implementing provisions.

The Group has various registration documents on record in the Official Registers of the Spanish National Securities Market Commission (CNMV) for non-participating securities in relation to covered bonds, public-sector covered bonds, ordinary bonds and debentures, subordinated bonds and debentures, and special perpetual subordinated debentures.

Similarly, the Group has registration documents on record in the Official Registers of the CNMV for the issuance of promissory notes.

Details, by maturity, of the items comprising the most significant balances of this heading of the Group's consolidated balance sheet are provided in Note 3.2, “Liquidity risk of financial instruments”.

Financial liabilities at amortised cost - Other financial liabilities

Details of this item on the accompanying consolidated balance sheets, by type, are as follows:

(in thousands of euros)

ITEM	31/12/2020	31/12/2019
Obligations payable	80,989	124,500
Collateral received	1,688	1,925
Tax collection accounts	298,386	274,575
Special accounts and other items	2,012,218	994,319
Financial guarantees	46,391	47,249
Total	2,439,672	1,442,568

“Special accounts and other items” include financial liabilities arising from leases due to the adoption of IFRS 16.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Movement in 2020 and 2019 in financial liabilities arising from leases is as follows:

(in thousands of euros)		
ITEM	2020	2019
Opening balance	512,000	-
Additions/disposals (net)	44,578	566,460
Interest cost	6,559	12,810
Lease payments	(69,765)	(67,270)
Closing balance	493,372	512,000

The present value of the remaining lease payments, discounted at the incremental borrowing rate at 31 December 2020, by remaining term to maturity, is as follows:

(in thousands of euros)				
ITEM	1 year	1 to 5 years	More than 5 years	Total
Financial liabilities arising from leases	63,227	153,038	277,107	493,372

The present value of the remaining lease payments, discounted at the incremental borrowing rate at 31 December 2019, by remaining term to maturity, is as follows:

(in thousands of euros)				
ITEM	1 year	1 to 5 years	More than 5 years	Total
Financial liabilities arising from leases	60,220	161,602	290,178	512,000

(20) Provisions

Details of this heading on the accompanying consolidated balance sheets at 31 December 2020 and 2019 are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Pensions and other post-employment defined benefit obligations (Note 38)	644,494	1,038,243
Pending procedural issues and tax litigation	195,903	224,539
Commitments and guarantees given	274,899	301,717
Other provisions	169,741	189,536
Total	1,285,037	1,754,035

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

The changes in and the purpose of the provisions recognised on the consolidated balance sheet in the years ended 31 December 2020 and 2019 are as follows:

(in thousands of euros)

ITEM	Pensions and other post-employment defined benefit obligations	Pending procedural issues and tax litigation	Commitments and guarantees given	Other provisions	Total
Balances at 31 December 2018	1,080,822	193,670	373,082	274,542	1,922,116
Net provisions/(reversals) charged/(credited) to profit or loss for the year (Notes 38 and 41)	(28,653)	104,233	(72,047)	11,019	14,552
Provisions charged to the income statement	-	104,233	27,362	34,390	165,985
Reversals credited to the income statement	(28,653)	-	(99,409)	(23,371)	(151,433)
Provisions used	(113,580)	(127,063)	-	(56,215)	(296,858)
Transfers and other movements	99,654	53,699	682	(39,810)	114,225
Balances at 31 December 2019	1,038,243	224,539	301,717	189,536	1,754,035
Net provisions/(reversals) charged/(credited) to profit or loss for the year (Notes 38 and 41)	(104,711)	96,293	(25,947)	9,934	(24,431)
Provisions charged to the income statement	-	105,850	66,835	15,539	188,224
Reversals credited to the income statement	(104,711)	(9,557)	(92,782)	(5,605)	(212,655)
Provisions used	(110,138)	(133,901)	-	(12,241)	(256,280)
Transfers and other movements	(178,900)	8,972	(871)	(17,488)	(188,287)
Balances at 31 December 2020	644,494	195,903	274,899	169,741	1,285,037

Pensions and other post-employment defined benefit obligations

The balance of pension and similar obligations at 31 December 2020 and 2019, recognised under "Provisions - Pensions and other post-employment defined benefit obligations" on the accompanying consolidated balance sheets, stood at EUR 644,494 thousand and EUR 1,038,243 thousand, respectively, reflecting the Group's obligations vis-à-vis its personnel as disclosed in Notes 2.13 and 38.2 to these consolidated financial statements.

In 2020, as a result of the closing of the Caser sale (see Note 1.15), the amount of the assets linked to the post-employment obligations insured by this company, recognised until 31 December 2019 under "Other assets - Insurance contracts linked to pensions", was presented net of liabilities under "Provisions - Pensions and other post-employment defined benefit obligations", as set out in applicable legislation. This amount totalled approximately EUR 189 million.

Also, under the new labour agreement, as indicated in Note 2.13.1.2, constant future growth has been set for defined benefit pension obligations of retired employees, applicable as from 1 January 2021, which has reduced pension obligations by approximately EUR 104 million.

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Pending procedural issues and tax litigation

The balance of "Pending procedural issues and tax litigation" includes, inter alia, provisions for tax and legal proceedings and was estimated applying prudent calculations in line with the uncertainty inherent in the obligations covered and considering the estimated timing of the outflow of resources from the Group.

As indicated in Note 2.18, various legal proceedings are underway in relation to Bankia's IPO.

Criminal proceedings at the National High Court

Both Bankia's IPO and its 2011 financial statements were investigated in Preliminary Proceedings no. 59/2012 (currently Abbreviated Proceedings 1/2018) at Central Examining Court No. 4 of the National High Court. These proceedings were instituted by Unión Progreso y Democracia ("UPyD"), among others, against Bankia, BFA and their respective management bodies, accusing them of (i) fraud; (ii) misappropriation; (iii) falsification of financial statements; (iv) breach of trust, and (v) price rigging.

On 11 May 2017, the presiding judge of Central Examining Court No. 4 of the National High Court ordered that there was a case to answer, thereby concluding the examination stage, and the case was continued in Abbreviated Proceedings. In the order, the judge established the punishable acts, classifying them as two alleged offences: (i) falsification of financial statements, as defined in article 290 of the Spanish Criminal Code; and (ii) investor fraud, as defined in article 282 bis), and determined the guilty parties. Accordingly, the order called for the prosecution of the Bank's former chairman, Mr. Rodrigo de Rato Figaredo, the former deputy chairman, Mr. José Luis Olivas Martínez, and 32 other individuals (directors and senior executives of Bankia and the external auditor of the 2011 financial statements), as well as Banco Financiero y de Ahorros (BFA) and Bankia.

Appeals for reconsideration and to a higher court were filed against the order and these were rejected, with the exception of the appeal lodged by the savings banks' employees' union (CIC) with respect to the dismissal of the criminal liability charges against the external audit firm at the time of the IPO, which was accepted with an order for the external auditor to remain party to the proceedings.

On 17 November 2017, Central Examining Court No. 4 of the National High Court ordered commencement of the trial. Specifically, this order commenced the trial in respect of the crimes of falsification of financial statements (defined in article 290 of Spain's Criminal Code) and investor fraud (article 282 bis of the Criminal Code) against certain former directors and current and former executives of Bankia and BFA, the external auditor at the time of the IPO, and against BFA and Bankia as legal persons. The State Prosecutor and the FROB presented written submissions seeking the dismissal of the criminal charges against BFA and Bankia. The FROB did not seek secondary civil liability on the part of Bankia or BFA.

On 29 September 2020, Panel 4 of the National High Court's Criminal Chamber delivered a judgment (no. 13/2020) whereby it unanimously acquitted all the defendants.

Only two prosecutors have lodged the corresponding cassation appeal with the Spanish Supreme Court's Criminal Chamber (namely, the Spanish Association of Minority Shareholders of Listed Companies (AEMEC) and Bochner España, S.L. et al.) against the judgment of 29 September 2020 handed down by Panel 4 of the National High Court's Criminal Chamber (no. 13/2020).

Considering the foregoing, the Bank has treated this contingency, in accordance with the criteria explained in Note 2.18.1, as a contingent liability the outcome of which remains uncertain at the present date.

Civil proceedings brought by retail investors

In the years since Bankia's IPO, a large number of civil lawsuits have been brought against the Bank by retail investors (on an individual and collective basis), in addition to out-of-court claims.

At 31 December 2015, the Group estimated a total contingency arising from these proceedings of EUR 1,840 million, which included EUR 1,040 million related to the cost of redeeming shares in enforcement of the judgments and EUR 800 million to cover the related legal costs and any late payment interest thereon. The estimates and assumptions used at 31 December 2015 were checked by an independent expert.

In execution of the Settlement Agreement for the distribution between BFA, Tenedora de Acciones, S.A.U. and Bankia of the potential costs arising from the civil lawsuits brought against these entities by retail investors following the placement on the primary market of shares of Bankia, and the addendum thereto, provisions have been recognised in the amounts of EUR 416 million and EUR 320 million, respectively (EUR 736 million in total).

Until 31 December 2020 and since the outset of the proceedings, the total provisions applied in view of the foregoing circumstances amounted to EUR 1,885 million, of which EUR 781 million pertain to Bankia (EUR 556 million in respect of invalidation for redemption of shares, and EUR 225 million in indemnities, interest and legal costs) and EUR 1,104 million to BFA in application of the agreement entered into between the two institutions whereby Bankia assumed a first-loss tranche of 40% of the estimated cost and BFA the remaining 60%. Accordingly, the contingency related to retail investors who subscribed shares in the IPO is considered to be practically resolved.

At 31 December 2020, there are a total of 164 civil proceedings ongoing with respect to shares purchased in the IPO and subsequently.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Civil proceedings brought by institutional investors

Up to 31 December 2020, 84 first instance judgments were handed down in relation to claims arising from the primary market, of which 24 found for and 60 against Bankia. Various regional courts have delivered 45 second instance judgments, of which 31 found against and 14 in favour of Bankia.

Moreover, 21 appeals in cassation have been lodged (9 of which were filed by other parties against four of the judgments that found in favour of Bankia, which are particularly relevant given the investor profile of the claimants, Bankia having contested these in due time and form, and 12 of which were lodged by Bankia, in view of the high profile of the investor, of which one has been rejected).

A preliminary ruling has been requested from the CJEU in relation to a particular institutional investor.

The Group's directors consider that the provision recognised at 31 December 2020 is sufficient to cover any amounts that may have to be paid as a result of the civil proceedings underway, taking into consideration no additional claims being filed and the rulings handed down on claims already lodged based on the investor profile. The key assumptions and those which, were they to change, could therefore have the greatest impact on the amount of this provision are the number of claims that could be brought, the expected outcome thereof and the profile of the claimants, given the inherent uncertainty. The effects of these changes would be recognised in accordance with the criteria described in Note 1.4, unless expressly indicated otherwise.

Regarding the other legal proceedings and claims ongoing, other than those related to the Bankia IPO, which are detailed in Note 2.18.2, the Group has recognised the provisions it estimates will be necessary as of the reporting date. The provisions used in 2020 mainly relate to payments made for the class action lawsuits detailed in Note 2.18.2 to these consolidated financial statements.

Provisions for contingent exposures and commitments

As described in Note 27.2, "Provisions for contingent exposures and commitments" include provisions recognised to cover off-balance sheet exposures, calculated using the same criteria as for impairment of financial assets measured at amortised cost.

Other provisions

"Other provisions" at 31 December 2020 mainly comprised the provision for workforce restructuring amounting to EUR 85 million, additional provisions related to the restructuring of investees and the related liabilities and contingencies, and other provisions to cover certain contingencies arising from the ordinary course of business.

(21) Other liabilities

The breakdown of this heading on the accompanying consolidated balance sheets at 31 December 2020 and 2019 is as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Transactions in transit	51,525	60,025
Other items ⁽¹⁾	905,364	833,950
Total	956,889	893,975

(1) Includes accruals associated with other operating expenses.

(22) Own funds

(22.1) Capital

On 3 May 2019, the agreement of 25 April 2019 of the Bank's Board of Directors, to partially implement the reduction of capital through the redemption of treasury shares, as approved by the shareholders at the General Meeting held on 22 March 2019, was filed at the Mercantile Registry of Valencia.

Previously, on 5 March 2019, authorisation was received from the European Central Bank to reduce capital by an effective amount of EUR 50 million by redeeming 15,440,845 shares, representing 0.50% of the share capital.

As a result, Bankia's share capital was reduced by EUR 15,440,845, through the redemption of 15,440,845 treasury shares.

The purpose of the capital reduction was the redemption of treasury shares. The capital reduction has not entailed the reimbursement of contributions, since Bankia is the owner of the redeemed shares. The capital reduction has been implemented with a charge to voluntary reserves, while simultaneously making the corresponding appropriation to a restricted reserve equal to the nominal amount of the effectively redeemed treasury shares.

At 31 December 2020, the Bank's share capital amounts to EUR 3,069,522 thousand, represented by 3,069,522,105 subscribed and fully paid up registered shares with a par value of EUR 1 each, of the same class and series.

During 2020 and 2019, no transaction costs were recognised for the issuance or acquisition of own equity instruments.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Bankia, S.A.'s main shareholders at 31 December 2020 and 2019 were as follows:

Shareholder	Number of shares		% ownership	
	31/12/2020	31/12/2019	31/12/2020	31/12/2019
BFA, Tenedora de Acciones, S.A.U.	1,897,818,273	1,896,894,838	61.828%	61.797%

(22.2) Transactions with treasury shares

During the years ended 31 December 2020 and 2019, changes to "Own funds (-) Treasury shares" on the balance sheet, showing the amount of Bankia equity instruments held by the Bank, were as follows:

ITEM	31/12/2020		31/12/2019	
	No. of shares	Amount (in thousands of)	No. of shares	Amount (in thousands of)
Opening balance	22,330,560	50,343	29,543,837	96,646
+ Purchases during the period	26,589,523	30,086	31,664,515	64,971
- Redemption of own securities (*)	-	-	(15,440,845)	(50,000)
- Sales and other changes	(16,934,883)	(30,954)	(23,436,947)	(61,274)
Closing balance	31,985,200	49,475	22,330,560	50,343
Net gain/(loss) on transactions with treasury shares (reserves)		(12,519)		(12,143)

(*) Redemption of own securities through capital reduction (see Note 22.1)

In accordance with prevailing regulations, transactions with treasury shares are recognised directly in equity, and no gain or loss may be recognised in the consolidated income statement in respect of such transactions.

Certain disclosures required by applicable regulations in connection with transactions involving treasury shares of Bankia, S.A. carried out by the Bank in 2020 and 2019 are as follows:

Acquisitions of treasury shares:

- Number of treasury shares acquired in 2020: 26,589,523 (31,664,515 shares at 31 December 2019).
- Par value of treasury shares acquired in 2020: EUR 26,590 thousand of EUR 1 par value (EUR 31,665 thousand of EUR 1 par value at 31 December 2019).
- Average price of treasury shares acquired in 2020: EUR 1.131 of EUR 1 par value (EUR 2.052 of EUR 1 par value at 31 December 2019).
- Total amount charged to equity in 2020: EUR 30,086 thousand (EUR 64,971 thousand at 31 December 2019).

Disposals of treasury shares:

- Number of treasury shares sold in 2020: 16,934,883 (23,436,947 shares at 31 December 2019).
- Par value of treasury shares sold in 2020: EUR 16,935 thousand of EUR 1 par value (EUR 23,437 thousand of EUR 1 par value at 31 December 2019).
- Average selling price of treasury shares sold in 2020: EUR 1.089 of EUR 1 par value (EUR 2.096 of EUR 1 par value at 31 December 2019).
- Amount credited to equity for sales in 2020: EUR 30,954 thousand (EUR 61,274 thousand at 31 December 2019).

Treasury shares held at 31 December 2020 and 2019:

- Number of treasury shares held: 31,985,200 (22,330,560 shares at 31 December 2019).
- Par value of treasury shares held: EUR 31,985 thousand of EUR 1 par value (EUR 22,331 thousand of EUR 1 par value at 31 December 2019).
- Average acquisition price of treasury shares held: EUR 1.547 (EUR 2.254 at 31 December 2019).
- Amount charged to equity for acquisition of treasury shares: EUR 49,475 thousand (EUR 50,343 thousand at 31 December 2019).

(22.3) Other reserves

The Group's consolidated statement of changes in equity for the years ended 31 December 2020 and 2019 shows the changes in this consolidated equity line item in those years.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(22.3.1) Restricted reserves

Under the Revised Spanish Companies Act, companies must transfer at least 10% of profit for each year to their legal reserve until such reserve reaches an amount equal to 20% of the share capital of the company. The legal reserve may be used to increase share capital provided that the balance left on the reserve is at least equal to 10% of the nominal value of the total share capital after the increase. Other than for this purpose, the legal reserve may only be used to offset losses, and only when no other sufficient reserves are available for such purpose. At 31 December 2020, the amount of this reserve is recognised under “Own funds - Other reserves” on the consolidated balance sheet and totals EUR 613,904 thousand (EUR 613,904 thousand at 31 December 2019).

During 2019, a restricted reserve equal to the par value of the treasury shares redeemed in the capital reduction referred to in Note 22.1, amounting to EUR 15,441 thousand, was established.

(22.3.2) Breakdown of reserves by entity

Details, by fully or proportionately consolidated or equity-accounted company, of “Reserves” on the consolidated balance sheets at 31 December 2020 and 2019 are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Bankia Mapfre Vida, S.A., de Seguros y Reaseguros	(41,776)	(53,536)
Bankia Habitat, S.L.U.	(2,224,532)	(2,173,112)
Caja Granada Vida, Compañía de Seguros y Reaseguros, S.A.	-	(4,148)
Cajamurcia Vida Y Pensiones de Seguros Y Reaseguros, S.A.	-	(9,870)
Corporación Industrial Bankia, S.A.U.	(1,103,943)	(1,038,530)
Geoportugal - Inmobiliaria, LDA.	-	(32,712)
Inversiones y Desarrollos 2069 Madrid, S.L.U., in liquidation	(20,078)	(19,972)
Promociones y Proyectos Murcilor, S.L., in liquidation	(20,012)	(20,012)
Proyectos y Desarrollos Hispanomexicanos, S.A. de C.V.	12,968	12,968

(22.4) Other information

(22.4.1) Investments in listed companies

Other than Bankia, S.A., no other Group subsidiary was listed on an organised market at 31 December 2020.

(22.4.2) Other resolutions adopted at the Annual General Meeting regarding the issuance of shares and other securities

At the Annual General Meeting held on 27 March 2020, the shareholders resolved to delegate to the Board of Directors of the Bank the following powers:

- The authority to increase the share capital by up to a maximum of 50% of subscribed share capital, by means of one or more increases and at any time within a maximum of five years, through cash contributions, with the authority, as the case may be, to approve the disapplication of pre-emptive subscription rights up to a maximum of 20% of share capital.
- The authority to issue, once or on several occasions, within a maximum term of five years, securities convertible into and/or exchangeable for shares of the Company, as well as warrants or other similar securities that may directly or indirectly entitle the holder to subscribe or acquire shares of the Company, for a total amount of up to one billion five hundred million (1,500,000,000) euros; as well as the authority to increase the share capital in the requisite amount, and the authority, as the case may be, to disapply pre-emptive subscription rights up to a maximum of 20% of share capital.
- Authorisation of the Board of Directors for the derivative acquisition of treasury shares in accordance with the limits and requirements established in the Spanish Companies Act.
- Authorisation of the Board of Directors for the distribution of dividends on account during the 2020 financial year.
- Authorisation of the Board of Directors to carry out capital reductions through the redemption of treasury shares.

(23) Accumulated other comprehensive income

Details of the balances under this consolidated balance sheet item at 31 December 2020 and 2019 are as follows:

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(in thousands of euros)

ITEM	31/12/2020	31/12/2019
Items that will not be reclassified to profit or loss	31,834	57,233
Actuarial gains or (-) losses on defined benefit pension plans	25,060	34,056
Non-current assets and disposal groups classified as held for sale	(18,744)	(9,347)
Share of other recognised income and expense of investments in joint ventures and associates	3,750	4,219
Fair value changes of equity instruments measured at fair value through other comprehensive income	21,768	28,305
Items that may be reclassified to profit or loss	113,505	122,769
Foreign currency translation	(458)	(113)
Hedging derivatives. Cash flow hedges [effective portion]	(3,063)	(8,006)
Fair value changes of debt instruments measured at fair value through other comprehensive income	85,764	82,085
Non-current assets and disposal groups classified as held for sale	-	(2,674)
Share of other recognised income and expense of investments in joint ventures and associates	31,262	51,477
Accumulated other comprehensive income	145,339	180,002

Items that may be reclassified to profit or loss. Fair value changes of debt instruments measured at fair value through other comprehensive income

This item on the accompanying consolidated balance sheet includes the net amount of the fair value changes of financial assets at fair value through other comprehensive income which must be recognised in the Group's equity. These changes are recognised in the consolidated income statement when the assets which gave rise to them are sold or become impaired.

The following table provides details of the gains and losses by financial instrument at 31 December 2020 and 2019:

31 December 2020

(in thousands of euros)

Gross amounts	Gains	Losses	Amounts net of tax effect	Gains	Losses
Quoted debt securities	136,978	(14,458)	Quoted debt securities	95,885	(10,121)
Unquoted debt securities	-	-	Unquoted debt securities	-	-
Total	136,978	(14,458)	Total	95,885	(10,121)
Total gains (gross)	122,520		Total gains (net)	85,764	

31 December 2019

(in thousands of euros)

Gross amounts	Gains	Losses	Amounts net of tax effect	Gains	Losses
Quoted debt securities	132,256	(14,992)	Quoted debt securities	92,579	(10,494)
Unquoted debt securities	-	-	Unquoted debt securities	-	-
Total	132,256	(14,992)	Total	92,579	(10,494)
Total gains (gross)	117,264		Total gains (net)	82,085	

Items that may be reclassified to profit or loss. Hedging derivatives. Cash flow hedges reserve

This item on the accompanying consolidated balance sheets reflects the net amount of changes in value of financial derivatives designated as hedging instruments in cash flow hedges, for the portion of such changes considered as an "effective hedge" (see Note 2.3).

Items that may be reclassified to profit or loss. Foreign currency translation

This item on the accompanying consolidated balance sheets comprises the amount of the exchange differences arising on monetary items whose fair value is adjusted against equity, and of the differences arising on the translation to euros of balances in the functional currencies of equity-accounted entities whose functional currency is not the euro.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Details of this heading on the consolidated balance sheets at 31 December 2020 and 2019 are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Bankia, S.A.	(458)	(113)
Total	(458)	(113)

Items that may be reclassified to profit or loss. Share of other recognised income and expense of investments in joint ventures and associates

This caption on the accompanying consolidated balance sheets reflects the carrying amount of valuation adjustments, of any type, recognised under equity in the consolidated financial statements of associates and joint ventures accounted for using the equity method.

Details of this heading on the consolidated balance sheets at 31 December 2020 and 2019 are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Bankia Mapfre Vida, S.A. de Seguros y Reaseguros	31,262	50,107
Caja Granada Vida Compañía Seguros y Reaseguros, S.A.	-	783
CajaMurcia Vida y Pensiones de Seguros y Reaseguros, S.A.	-	587
Total	31,262	51,477

Items that will not be reclassified to profit or loss. Actuarial gains or (-) losses on defined benefit pension plans

This item on the consolidated balance sheet shows the amount of gains or losses on post-employment defined benefit remuneration which are not recognised in consolidated profit or loss (see Notes 2.13.1 and 38.3).

The consolidated statement of recognised income and expense for 2020 and 2019 shows the changes in "Accumulated other comprehensive income" on the consolidated balance sheet for these years.

(24) Minority interests [non-controlling interests]

Details, by consolidated company, of "Minority interests [non-controlling interests]" on the accompanying consolidated balance sheets are as follows:

(in thousands of euros)		
COMPANY	31/12/2020	31/12/2019
Corporación Financiera Habana, S.A., in liquidation (see Note 1.15)	-	11,001
Other companies	2,547	2,324
Closing balance	2,547	13,325

Details, by company, of "Profit or (-) loss attributable to minority interests" in the accompanying consolidated income statement of the Group for 2020 and 2019 are as follows:

(in thousands of euros)		
COMPANY	31/12/2020	31/12/2019
Arrendadora de Equipamientos Ferroviarios, S.A.	219	194
Corporación Financiera Habana, S.A., in liquidation	-	663
Inversión General de Granada 2, S.L., in liquidation	-	(4)
Closing balance	219	853

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Details, by company, of the changes in the balance of "Minority interests" on the consolidated balance sheets for the years ended 31 December 2020 and 2019 are as follows:

31 December 2020

(in thousands of euros)				
COMPANY	31/12/2019	Dividends paid to minority shareholders	Profit or loss, capital increase and other	31/12/2020
Arrendadora de Equipamientos Ferroviarios, S.A.	2,328	-	219	2,547
Corporación Financiera Habana, S.A., in liquidation	11,001	-	(11,001)	-
Other companies	(4)	-	4	-
Closing balance	13,325	-	(10,778)	2,547

31 December 2019

(in thousands of euros)				
COMPANY	31/12/2018	Dividends paid to minority shareholders	Profit or loss, capital increase and other	31/12/2019
Arrendadora Aeronáutica, AIE	134	-	(134)	-
Arrendadora de Equipamientos Ferroviarios, S.A.	2,134	-	194	2,328
Corporación Financiera Habana, S.A., in liquidation	10,620	(16)	397	11,001
Other companies	(414)	-	410	(4)
Closing balance	12,474	(16)	867	13,325

Details of the non-Group or related companies with ownership interests of 10% or more in Group companies at 31 December 2020 and 2019 are as follows:

Group company	Investment holder	Percentage ownership	
		31/12/2020	31/12/2019
Arrendadora de Equipamientos Ferroviarios, S.A.	CAF Investment Projects, S.A.	15.00	15.00
Corporación Financiera Habana, S.A., in liquidation	Banco Popular de Ahorro de Cuba, S.A	-	40.00

(25) Fair value

(25.1) Fair value of financial instruments

The fair value of a financial instrument on a specific date is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

The Group generally uses the following methods to estimate the fair value of financial instruments:

- When the market publishes closing prices, these prices are used to determine the fair value.
- When the market publishes both bid and ask prices for the same instrument, the market price for an asset purchased or a liability to be issued is the bid price and that for an asset to be purchased or a liability issued is the ask price. If there is significant market-making activity or it can be demonstrated that the positions can be closed – settled or hedged – at the average price, the average price is used.
- If there is no market price for a given financial instrument or for barely active markets, its fair value is estimated on the basis of the price established in recent transactions involving similar instruments and, in the absence thereof, based on proven valuation techniques used by the international financial community, taking into account the specific features of the instrument to be measured and, particularly, the various types of risk associated with it.
- The valuation techniques used to estimate the fair value of a financial instrument meet the following requirements:
 - The techniques used are based on the most consistent and appropriate economic and financial methods, which have been demonstrated to provide the most realistic estimate of the financial instrument's price.
 - They are those which are customarily used by market participants to measure this type of financial instrument, such as the discounted cash flow method, non-arbitrage option pricing models, etc.

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- They maximise the use of available information, in relation to both observable data and recent transactions of similar characteristics, and limit the use of non-observable data and estimates as far as possible.
- They are sufficiently and amply documented, including the reasons why they were chosen in preference to other possible alternatives.
- They are applied consistently over time so long as the reasons for choosing them do not change.
- The validity of the models is examined periodically using recent transactions and current market data.
- They consider the following factors: the time value of money, credit risk, exchange rates, commodity prices, equity prices, volatility, liquidity, prepayment risk and servicing costs.
- For initial recognition of financial instruments with no market or with a barely active market, the fair value is obtained either on the basis of the most recent transaction price, unless another value can be demonstrated through comparison with other recent market transactions involving the same instrument, or by using a valuation technique in which all the variables are taken solely from observable market data.
- The fair value of derivatives is determined as follows:
 - The fair value of derivatives traded on an organised, transparent and deep market included in the trading portfolios is equivalent to their daily quotation price and, if this is not available at a given date due to exceptional reasons, methods similar to those used to measure derivatives not traded on organised markets will be applied.
 - The fair value of OTC derivatives or derivatives traded on organised but less deep and transparent markets is equivalent to the sum of the future cash flows arising from the instrument, discounted at the measurement date ("present value" or "notional close") using valuation techniques accepted by the financial markets: "net present value" (NPV), option pricing models, etc. Moreover, for derivatives not supported by a CSA (market standard) collateral agreement, an own and/or third-party credit risk adjustment (CVA and DVA) is determined, differentiated based on the internal rating of the counterparty (see Note 3.1):
 - Counterparties rated CCC or higher: all components are taken directly from the market (risk factors that affect the value of the derivative) or indirectly from the inputs that reflect credit risk through quoted prices in markets that are closest to that of the counterparty and of Bankia.
 - Counterparties classified as non-performing: internal expert criteria regarding recovery of the debt are used as there are no market indices to assess their credit risk due to the absence of a secondary market with prices and reasonable liquidity.

CVA and DVA are included in the valuation of both asset and liability derivatives to reflect the impact of counterparty and own credit risk, respectively, on fair value.

CVA is calculated considering potential exposure to each counterparty in each future period. The CVA for a specific counterparty is the sum of the CVAs for all periods. The adjustments are calculated by estimating exposure at default, probability of default and loss given default for all derivatives on any underlying at legal entity-level to which the Bankia Group is exposed.

DVA is a similar valuation adjustment to CVA, but arises from Bankia's own risk assumed by its counterparties in OTC derivatives. Similarly, DVA is calculated by multiplying expected negative exposure by probability of default and multiplying the result by Bankia's loss given default.

The credit risk valuation adjustments recognised on the consolidated balance sheet at 31 December 2020 were EUR 59 million for CVA (EUR 100 million at 31 December 2019) and EUR 2 million for DVA (EUR 3 million at 31 December 2019). The impact recognised in "Gains or (-) losses on financial assets and liabilities held for trading, net" in the consolidated income statement for 2020 corresponding to these adjustments is a profit of EUR 1 million (a profit of EUR 0.4 million at 31 December 2019).

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Determination of fair value of financial instruments

The following table compares the amounts at which the Group's financial assets and financial liabilities are recognised on the accompanying consolidated balance sheets and their related fair value:

(in thousands of euros)

ITEM	31/12/2020		31/12/2019	
	Balance sheet total	Fair value	Balance sheet total	Fair value
ASSETS				
Cash, cash balances at central banks and other demand deposits	11,808,227	11,808,227	13,202,885	13,202,885
Financial assets held for trading	6,767,906	6,767,906	6,690,901	6,690,901
Non-trading financial assets mandatorily at fair value through profit or loss	11,385	11,385	34,755	34,755
Financial assets at fair value through other comprehensive income	8,623,635	8,623,635	11,981,872	11,981,872
Financial assets at amortised cost	163,405,078	174,767,333	155,968,440	166,555,103
Non-current assets and disposal groups classified as held for sale – Other equity instruments	119,164	119,164	134,919	134,919
Derivatives – Hedge accounting	2,451,227	2,451,227	2,498,821	2,498,821
LIABILITIES				
Financial liabilities held for trading	6,876,191	6,876,191	6,750,111	6,750,111
Financial liabilities at amortised cost	187,069,874	188,300,772	185,176,254	185,121,750
Derivatives – Hedge accounting	153,150	153,150	87,402	87,402

For financial instruments whose carrying amount differs from their theoretical fair value, the latter was calculated as follows:

- The fair value of "Cash, cash balances at central banks and other demand deposits" is measured as the carrying amount, as the balances are current.
- The fair values of "Financial assets at amortised cost" and "Financial liabilities at amortised cost" were estimated using the discounted cash flow method, taking market interest rates at the end of each period without considering the issuer's credit risk. This valuation is considered to use Level 3 inputs in the approaches described below for financial instruments whose carrying amount is equal to their fair value.
- The fair value of debt securities classified as "Financial assets at amortised cost" is considered equivalent to their quoted price in active markets, except for the SAREB bonds (see Note 12), whose fair value was estimated using Level 2 inputs and did not differ significantly from their carrying amount (fair value was determined using quoted prices of Spanish government bonds of similar characteristics).

Financial instruments whose carrying amount coincides with their fair value were measured as follows:

- LEVEL 1: Financial instruments whose fair value was determined by reference to their quoted price in active markets, without making any change to these prices.
- LEVEL 2: Financial instruments whose fair value was estimated by reference to quoted prices on organised markets for similar instruments or using other valuation techniques in which all the significant inputs are based on directly or indirectly observable market data.
- LEVEL 3: Financial instruments whose fair value was estimated by using valuation techniques in which one or another significant input is not based on observable market data. An input is deemed to be significant when it is important for determining the fair value as a whole.

The Group has not recognised any financial assets or liabilities whose fair value differs from the transaction price and has not been evaluated through methodologies and assumptions that would allow them to be classified in Level 1 and Level 2. Consequently, no gains or losses have been recognised to reflect changes in the factors used in the valuation that market participants would take into account when pricing the asset or liability. Any difference between the transaction price of an instrument and its fair value is recognised immediately in the income statement, in the case of financial instruments classified in levels 1 and 2 of the fair value hierarchy.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

The following table presents the main financial instruments measured at fair value on the accompanying consolidated balance sheet, by measurement method used to estimate fair value:

(in thousands of euros)

ITEM	31/12/2020			31/12/2019		
	Level 1	Level 2	Level 3	Level 1	Level 2	Level 3
ASSETS						
Financial assets held for trading	82,949	6,622,414	62,543	158,904	6,437,567	94,430
Debt securities	80,554	-	-	155,899	14,896	-
Equity instruments	684	-	-	1,381	-	-
Derivatives	1,711	6,622,414	62,543	1,624	6,422,671	94,430
Non-trading financial assets mandatorily at fair value through profit or loss	-	193	11,192	-	237	34,518
Debt securities	-	193	-	-	237	-
Equity instruments	-	-	-	-	-	-
Loans and advances	-	-	11,192	-	-	34,518
Financial assets at fair value through other comprehensive income	8,514,286	69,052	40,297	11,846,580	94,622	40,670
Debt securities	8,514,286	49,806	-	11,846,580	59,475	-
Equity instruments	-	19,246	40,297	-	35,147	40,670
Non-current assets and disposal groups classified as held for sale - Equity instruments	-	-	119,164	-	-	134,919
Derivatives – Hedge accounting	-	2,451,227	-	-	2,498,821	-
LIABILITIES						
Financial liabilities held for trading	190,971	6,680,655	4,565	271,233	6,474,061	4,817
Derivatives	1,767	6,680,655	4,565	-	6,474,061	4,817
Short positions	189,204	-	-	271,233	-	-
Derivatives – Hedge accounting	-	153,150	-	-	87,402	-

The amounts recognised in the consolidated income statements for 2020 and 2019 due to changes in the fair value of the Group's financial instruments are shown below. The changes relate to unrealised gains and losses, with a distinction made between financial instruments whose fair value is estimated using valuation techniques whose variables are obtained from observable market inputs (Level 2) and those for which one or more significant variables are not based on observable market inputs (Level 3). Also shown are the cumulative unrealised changes in value at 31 December 2020 and 2019:

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31 December 2020

(in thousands of euros)

ASSETS	Fair value changes in the period			Cumulative fair value changes recognised on the consolidated balance sheet		
	Level 2	Level 3	Total	Level 2	Level 3	Total
ASSETS						
Financial assets held for trading	235,974	11,745	247,719	6,017,613	55,958	6,073,571
Debt securities	-	-	-	-	-	-
Derivatives	235,974	11,745	247,719	6,017,613	55,958	6,073,571
Non-trading financial assets mandatorily at fair value through profit or loss	(29)	-	(29)	(219)	-	(219)
Equity instruments	-	-	-	-	-	-
Debt securities	(29)	-	(29)	(219)	-	(219)
Loans and advances	-	-	-	-	-	-
Financial assets at fair value through other comprehensive income	(4,655)	(303)	(4,958)	12,654	18,811	31,465
Equity instruments	(9,297)	(303)	(9,600)	12,286	18,811	31,097
Debt securities	4,642	-	4,642	368	-	368
Derivatives – Hedge accounting	(15,518)	-	(15,518)	2,181,592	-	2,181,592
TOTAL ASSETS	215,772	11,442	227,214	8,211,640	74,769	8,286,409
LIABILITIES						
Financial liabilities held for trading	(229,817)	(640)	(230,457)	6,614,777	(3,046)	6,611,731
Derivatives	(229,817)	(640)	(230,457)	6,614,777	(3,046)	6,611,731
Derivatives – Hedge accounting	(154,256)	-	(154,256)	63,952	-	63,952
TOTAL LIABILITIES	(384,073)	(640)	(384,713)	6,678,729	(3,046)	6,675,683

31 December 2019

(in thousands of euros)

ASSETS	Fair value changes in the period			Cumulative fair value changes recognised on the consolidated balance sheet		
	Level 2	Level 3	Total	Level 2	Level 3	Total
ASSETS						
Financial assets held for trading	3,217,721	21,146	3,238,867	5,796,645	87,617	5,884,262
Debt securities	-	-	-	-	-	-
Derivatives	3,217,721	21,146	3,238,867	5,796,645	87,617	5,884,262
Non-trading financial assets mandatorily at fair value through profit or loss	(12)	-	(12)	(233)	-	(233)
Equity instruments	-	-	-	-	-	-
Debt securities	(12)	-	(12)	(233)	-	(233)
Loans and advances	-	-	-	-	-	-
Financial assets at fair value through other comprehensive income	17,762	(807)	16,955	24,563	18,852	43,415
Equity instruments	10,653	(807)	9,846	21,583	18,852	40,435
Debt securities	7,109	-	7,109	2,980	-	2,980
Derivatives – Hedge accounting	210,024	-	210,024	2,205,820	-	2,205,820
TOTAL ASSETS	3,445,495	20,339	3,465,834	8,026,795	106,469	8,133,264
LIABILITIES						
Financial liabilities held for trading	(2,983,868)	158	(2,983,710)	6,405,436	(3,407)	6,402,029
Derivatives	(2,983,868)	158	(2,983,710)	6,405,436	(3,407)	6,402,029
Derivatives – Hedge accounting	(311,649)	-	(311,649)	34,520	-	34,520
TOTAL LIABILITIES	(3,295,517)	158	(3,295,359)	6,439,956	(3,407)	6,436,549

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

The following table presents the main valuation methods, assumptions and inputs used to estimate the fair value of financial instruments classified as level 2 and 3, by type of instrument, and the related balances at 31 December 2020:

			(in millions of euros)	
Level 2 financial instruments	Valuation techniques	Main assumptions	Inputs	Fair value
Debt securities	Present value method (discounted cash flows) LIBOR Market Model (LMM)	Calculation of the present value of financial instruments as the present value of the future cash flows (discounted at market interest rates), bearing in mind: estimation of prepayment rates, issuer credit risk and current market interest rates. Inclusion of stochastic volatilities in the LMM allows complete modelling of the volatility area.	<ul style="list-style-type: none"> - Yield curves - Credit spreads - Correlation 	Debt securities: 50
Equity instruments	Present value method	Calculation of the present value of future cash flows. Considering: <ul style="list-style-type: none"> - Issuer credit spreads - Prepayment rates - Yield curves - Risk neutrality, non-arbitrage 	<ul style="list-style-type: none"> - Yield curves - Credit spreads 	Equity instruments: 19
Derivatives	Interest rate derivatives: Black and LIBOR Market Model	For measurement of widely traded instruments, e.g. caps, floors, European swaptions, etc.	For equity, inflation, currency or commodity derivatives: <ul style="list-style-type: none"> - Forward structure of the underlying - Option volatility - Observable correlations between underlyings 	Trading derivatives: Assets: 6,622 Liabilities: 6,681
	For equity, currency or commodity derivatives: Black-Scholes, Skew Model and Tremor model	For measurement of widely traded instruments, e.g. call, put, straddle, etc.	For interest rate derivatives: <ul style="list-style-type: none"> - Term structure of interest rates - Volatility of the underlying 	Hedging derivatives: Assets: 2,451 Liabilities: 153
	Inflation derivatives: Analytical formula	Absence of correlation between interest rates and inflation. Risk neutrality, absence of arbitrage opportunities.	For credit derivatives: <ul style="list-style-type: none"> - Credit default swap (CDS) quoted prices 	
	Credit derivatives: Analytical formula	Calculation of probability of default (PD) levels to ensure compliance with the risk neutrality and non-arbitrage assumptions.		

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

			(in millions of euros)	
Level 3 financial instruments	Valuation techniques	Main assumptions	Unobservable inputs	Fair value
Debt instruments	Present value method The Gaussian Copula Model LIBOR Market Model (LMM)	Calculation of the present value of financial instruments as the present value of the future cash flows (discounted at market interest rates), bearing in mind: estimation of prepayment rates, issuer credit risk and current market interest rates. In the case of asset-backed securities (ABS), future prepayments are calculated based on conditional prepayment rates provided by the issuers. The "time-to-default" model is used to measure the probability of default. Inclusion of stochastic volatilities in the LMM allows complete modelling of the volatility area.	<ul style="list-style-type: none"> • Prepayment rates • Credit spread • Default correlation • Interest rate correlation 	Debt securities: Loans and advances: 11
Equity instruments	Present value method	Net asset value (NAV) for hedge funds and for equity instruments listed in thin or less active markets.	<ul style="list-style-type: none"> • Credit spread; • NAV provided by the fund manager or the issuer of the securities 	Equity instruments: 40
Derivatives	Interest rate derivatives: LIBOR Market Model (LMM), Hull-White model (HW)	Both methods are based on modelling of near-term future interest rate performance, replicating the yield curve and volatility surface. The inclusion of stochastic volatilities in the LMM allows complete modelling of the volatility area, making the LMM model the most widely used to measure exotic derivatives. The HW model is used provided the volatility smile does not affect the value of the derivative.	<ul style="list-style-type: none"> • Correlation • Term structure of volatilities based on the underlying 	Trading derivatives: Assets: 63
	For equity and currency derivatives: Dupire, Heston, solved by numerical methods	The options are measured using generally accepted valuation models and include implied volatility observed.	<ul style="list-style-type: none"> • Correlation • Term structure of volatilities • Dividends 	Liabilities: 5
	Inflation derivatives: Jarrow-Yildirim	The Jarrow-Yildirim model is used for modelling inflation and nominal rates. This model is based on the analogy between the inflation index and foreign exchange rates.	<ul style="list-style-type: none"> • Correlation • Inflation curve • Nominal rates 	
	Credit baskets: Gaussian Copula	The Gaussian Copula measurement method is widely accepted in financial markets for its simplicity.	<ul style="list-style-type: none"> • Correlation between defaults • Historical CDS volatility 	

Any change in one or more variables or other assumptions deemed as reasonable would not result in a significant change in the fair value of Level 3 financial instruments relative to the total portfolio of financial instruments.

The Group has a formal policy that sets out the procedure for assigning fair value levels and potential changes therein.

According to this procedure, a level is assigned to financial instruments measured at fair value, determined based on the quality and availability of the various inputs, models, market information etc. at the date of purchase of the position. These parameters are subsequently reviewed periodically in accordance with their trends.

This procedure is carried out by analysing the information available to the Group to set the valuation price, studying the necessary inputs, the sources and quality of the information, or the need to use more complex models.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Transfers of financial instruments not classified as non-current assets held for sale between fair value hierarchy levels in 2020 and 2019 were as follows:

At 31 December 2020

(in thousands of euros)							
Transfers between levels	FROM:	Level 1		Level 2		Level 3	
	TO:	Level 2	Level 3	Level 1	Level 3	Level 1	Level 2
Assets							
Financial assets held for trading – Derivatives		-	-	-	2	-	52,072
Financial assets at fair value through other comprehensive income		-	-	-	-	-	-
Liabilities							
Financial liabilities held for trading – Derivatives		-	-	-	5	-	1

At 31 December 2019

(in thousands of euros)							
Transfers between levels	FROM:	Level 1		Level 2		Level 3	
	TO:	Level 2	Level 3	Level 1	Level 3	Level 1	Level 2
Assets							
Financial assets held for trading – Derivatives		-	-	-	4,765	-	3,883
Financial assets at fair value through other comprehensive income		-	-	35,980	-	-	-
Liabilities							
Financial liabilities held for trading – Derivatives		-	-	-	4	-	4

The value of the financial instruments transferred between measurement levels in 2020 is immaterial relative to the total value of the portfolios and relates mainly to changes in one or more characteristics of the assets. Specifically:

- Transfer from Level 2 to Level 3 of EUR 0 million: as relevant inputs that represent key assumptions (credit risk) used in the valuation technique to measure certain derivatives have become unobservable.
- Transfer from Level 3 to Level 2 of EUR 52 million: as relevant observable inputs that represent key assumptions (credit risk) used in the valuation technique to measure certain derivatives have been found.

Movement in the balances of financial assets and financial liabilities at fair value and categorised within Level 3 shown on the accompanying consolidated balance sheets at 31 December 2020 and 2019, is as follows:

(in thousands of euros)				
	2020		2019	
	Assets	Liabilities	Assets	Liabilities
Opening balance	169,618	4,817	139,947	3,979
Gains (losses)	1,868	(253)	4,882	(1,060)
To profit or loss	2,238	(253)	5,626	(1,060)
To reserves from sales	(329)	-	538	-
Valuation adjustment (equity)	(41)	-	(1,282)	-
Purchases, sales and settlements	(23,725)	(34)	22,349	1,819
Net inflows/(outflows) in Level 3	(33,729)	35	2,440	79
Closing balance	114,032	4,565	169,618	4,817

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Gains and losses in 2020 and 2019 on disposals of financial instruments categorised within Level 3 recognised in the accompanying income statement were not significant.

The following table shows the changes in fair value of equity instruments classified as “Non-current assets and disposal groups classified as held for sale” included in Level 3 within the fair value hierarchy and recognised on the accompanying consolidated balance sheets at 31 December 2020 and 2019:

(in thousands of euros)		
	2,020	2,019
Opening balance	134,919	132,185
Gains (losses)	(13,703)	(17,958)
Other net variations	(2,052)	20,692
Closing balance	119,164	134,919

(25.2) Fair value of assets and liabilities included in disposal groups and discontinued operations

Note 18.5.1 includes information on the sale of portfolios of loans and real estate assets that make up a disposal group. These assets are stated at the selling price less the related costs to sell, and their fair value therefore coincides with their carrying amount.

The table below provides a comparison between the carrying amount of financial assets and financial liabilities by line item on the accompanying consolidated balance sheet under which they were recognised before classification under “Non-current assets and disposal groups classified as held for sale” and their corresponding fair value:

(in thousands of euros)				
Assets	31/12/2020		31/12/2019	
	Balance sheet total	Fair value	Balance sheet total	Fair value
Cash, cash balances at central banks and other demand deposits	3	3	1	1
Financial assets at amortised cost	774	774	12,949	12,949
Liabilities	31/12/2020		31/12/2019	
	Balance sheet total	Fair value	Balance sheet total	Fair value
Financial liabilities at amortised cost	155	155	2,365	2,365

At 31 December 2020 and 2019, there were no financial assets or liabilities measured at fair value before their classification as non-current assets held for sale - disposal groups on the accompanying consolidated balance sheet.

(25.3) Fair value of other assets, not considered as a disposal group or discontinued operations

(25.3.1) Real estate assets

The table below shows the fair value of certain tangible assets of the Group at 31 December 2020 and 2019, by category, as well as their carrying amount at those dates:

(in thousands of euros)				
ITEM	31/12/2020		31/12/2019	
	Carrying amount	Fair value	Carrying amount	Fair value
Own use – Buildings and other structures	1,774,602	2,081,415	1,826,185	2,147,180
Investment property	465,733	703,745	481,302	672,405
Total	2,240,335	2,785,160	2,307,487	2,819,585

The fair value of the tangible assets in the preceding table was estimated based on the recoverable amount, which is the higher of the asset's fair value less costs of disposal and its value in use (derived from the present value of the estimated future cash flows from the assets). In the specific case of tangible assets for own use, fair value is obtained from market inputs or, failing this, valuation techniques that consider the yields, flows or replacement cost of the asset. For investment property, the best evidence of fair value is the current price on an active market for similar assets, adjusted where necessary in accordance with the particular characteristics of each asset, or, as appropriate, recent prices on less active markets and discounted cash flow projections of rents of similar properties.

As explained in Note 2.17, at 31 December 2020 and 2019 the Group did not have any balances under inventories.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

The amounts recognised in the 2020 and 2019 income statements were EUR 146,189 thousand and EUR 146,371 thousand, respectively under "Depreciation and amortisation", and reversals of EUR 15,786 thousand and EUR 14,544 thousand in "Impairment or (-) reversal of impairment on non-financial assets – Tangible assets", respectively.

Better and greater use of non-financial assets does not mean a different use, except for the real estate assets owned by the Group, where the building and facilities are considered as assets for the purpose of measuring land.

(25.3.2) Real estate assets classified as non-current assets held for sale

The fair values of the Bankia Group's tangible assets for own use classified under "Non-current assets and disposal groups classified as held for sale" at 31 December 2020 and 2019 were EUR 176,780 thousand and EUR 168,381 thousand, respectively.

The carrying amount of the Group's foreclosed real estate assets, which were classified as "Non-current assets and disposal groups classified as held for sale", does not differ significantly from their fair value.

As explained in Note 2.20, non-current assets foreclosed or received in payment of debt are recognised initially at the lower of the carrying amount of the financial assets applied and the fair value at the date of foreclosure or receipt of the assets less estimated costs to sell, and are subsequently recognised at fair value less estimated costs to sell.

The Group has an internal methodology for estimating discounts on the reference value and costs to sell real estate assets foreclosed or received in payment of debt classified as non-current assets held for sale. This methodology is based on the Group's prior experience of sales of similar assets, in terms of time scales, prices and volumes, and the time taken for their sale. The methodology complies with the principles and requirements governing the development and use of internal methodologies for estimating discounts on the reference value and the costs to sell assets foreclosed or received in payment of debt, and it underwent the necessary internal validation process prior to its approval and use.

The reference value used to estimate fair value is the market value obtained in appraisals updated at least annually. As regards appraisals, the Group uses those performed by certified appraisal services or companies on the Bank of Spain's Official Register of Appraisal Companies, using full individual appraisals or appraisals performed using automated valuation methods.

The full individual appraisals comply with the requirements of Ministerial Order ECO 805/2003, of 27 March, on rules for the appraisal of real estate and of certain rights for financial purposes. This order contains, inter alia, the various technical methods and measurement procedures for determining the appraisal value of the various real estate assets in accordance with their uses, and for the preparation of appraisal reports and certificates. The content is based on the principle of prudence and the principle of sustainability for values with long-term impacts. This Order, continuing along the lines of Royal Decree 775/1997, of 30 May, on the legal framework governing the certification of appraisal services and companies, aims to promote the technical and formal quality of the appraisals with the overriding aim of better protecting the interests of third parties as investors or insured parties.

Automated appraisal methods are based on statistical models supported by computer programs that use a broad database. This allows for mass appraisals bearing in mind the specific characteristics of each asset appraised, but assuming a confidence interval in the results as, by definition, the models do not factor in all the variables that affect the value. Without prejudice to their statistical basis, throughout the valuation process these appraisals include expert judgements by the appraisal company as regards the model's construction and specification, and in comparisons, and in selecting the appropriate model for each specific appraisal engagement. In 2019, the Bank of Spain issued "Supervisory guidelines for the use of automated valuation models by appraisal companies" for use by registered appraisal companies, applicable to appraisers in appraisals using automated valuation methods for credit institutions. The guidelines identify the recommended best practices for the definition and application of robust valuation procedures using this type of appraisal, and fall within the Bank of Spain's powers to supervise appraisal companies, as laid down in Royal Decree 775/1997.

Information on the companies and agencies carrying out appraisals in 2020 and 2019 is provided below:

(% appraised)		
Appraisal companies or agencies	2020	2019
Gesvalt	11.52%	13.07%
Tecnitasa	8.97%	5.42%
Tinsa	48.01%	47.00%
Sociedad de Tasación	7.82%	12.46%
Arco Valoraciones	14.91%	13.43%
KRATA	8.77%	8.62%
Total	100.00%	100.00%

The valuations are classified as Level 3 in the methodologies described in the consolidated financial statements.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(25.3.3) Investments classified as “Non-current assets and disposal groups classified as held for sale”

The following table details the fair value hierarchy for investments in joint ventures and associates classified as “Non-current assets and disposal groups classified as held for sale” at 31 December 2020 and 2019

(in thousands of euros)

ITEM	2020			2019		
	Level 2	Level 3	Total	Level 2	Level 3	Total
Closing balance	-	617	617	-	119,209	119,209

The valuation techniques and inputs used were as follows:

Level 2: fair value is determined using as inputs quoted prices in active markets, less estimated costs of disposal by reference to the discount generally required by the market for the block sale of significant shareholdings in quoted companies.

Level 3: fair value was estimated mainly using the present value method based on net asset value (NAV).

The reconciliation of opening balances to closing balances for Level 3 assets is as follows:

(in thousands of euros)

ITEM	2,020	2,019
Opening balance	119,209	21,881
Transfers	-	111,292
Allowances, settlements and sales	(118,592)	(13,964)
Closing balance	617	119,209

(26) Taxation

(26.1) Consolidated tax group

The entities that make up the consolidated tax group headed by Bankia, S.A., in addition to the parent itself, are as follows:

INMOGESTION Y PATRIMONIOS, S.A.
 PARTICIPACIONES Y CARTERA DE INVERSIÓN, S.L. (PACIN)
 VALORACION Y CONTROL, S.L.
 NAVIERA CATA, S.A.
 VALENCIANA DE INVERSIONES MOBILIARIAS, S.L.
 CORPORACION INDUSTRIAL BANKIA, S.A.U.
 BANKIA HABITAT S.L.
 ARRENDADORA DE EQUIPAMIENTOS FERROVIARIOS, S.A.
 CENTRO DE SERVICIOS OPERATIVOS E INGENIERIA DE PROCESOS, S.L.U.
 BANKIA MEDIACIÓN, OPERADOR DE BANCA SEGUROS VINCULADO, S.A.U.
 BANKIA PENSIONES, S.A. E.G.F.P.
 BANKIA FONDOS S.G.I.I.C., S.A.
 GESTIÓN Y REPRESENTACIÓN GLOBAL, S.L.U.
 GESTIÓN GLOBAL DE PARTICIPACIONES, S.L.U.
 GESTION Y RECAUDACION LOCAL, S.L.
 BANKIA COMMERCE, S.L. UNIPERSONAL
 BANKIA FINTECH VENTURE S.A.U.
 PUERTAS DE LORCA DESARROLLOS EMPRESARIALES, S.L.U.
 SEGURBANKIA, S.A.

All other subsidiaries and other entities included in the scope of consolidation of the Bankia Group at 31 December 2020 file individual income tax returns.

(26.2) Years open to inspection by the taxation authorities and provisions recognised

At 31 December 2020, the Bank had open to inspection by the taxation authorities all applicable taxes for the last four years.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

On 13 October and 20 October 2014, tax inspections were commenced to verify the Bank's compliance with tax obligations and duties for the following taxes and tax periods:

ITEM	PERIOD
Income tax	2011 to 2013
Value added tax	2011 to 2012
Withholdings/Payments on account for earned income/income from professional activities	2011 to 2012
Withholdings/Payments on account for capital gains tax	2011 to 2012
Withholdings/Payments on account for leases	2011 to 2012
Withholdings on account for non-resident income tax	2011 to 2012
Annual return of transactions	2011 to 2012
Special tax for real estate of non-residents	2011 to 2012
Value added tax	11/2013 to 12/2013

These tax inspections are still ongoing at present. No matter worthy of disclosure has arisen in this respect.

The scope of the value added tax inspections was expanded on 26 October 2017 (November and December 2013).

On 26 September 2018, the scope of the corporate income tax inspections was expanded to include 2013.

On 19 November 2019, assessments in respect of withholdings on account for non-resident income tax for 2011 and 2012 in an amount of EUR 1,096 thousand were signed on an uncontested basis. The EUR 506 thousand fine arising from the disciplinary proceedings for this tax was signed on an uncontested basis.

Assessments were signed on an uncontested basis on 28 February 2020 in respect of withholdings/payments on account for earned income and income from professional activities, which resulted in an amount payable of EUR 9,737 thousand (including late payment interest and penalty). As the successor of Caja Madrid's banking business (assignment of responsibility), Bankia paid an amount of EUR 3,377 thousand for this item (including late payment interest and penalty).

Inspections performed at the "Cajas de Ahorros"

In relation to the "Cajas de Ahorros" (savings banks) which transferred their financial business on 16 May 2011, firstly to BFA and subsequently to Bankia, the following should be noted:

- On 11 March 2014, inspections were commenced at Caja de Ahorros y Monte de Piedad de Madrid in order to ascertain compliance with tax obligations and duties in respect of the following items and periods:

ITEM	PERIOD
Income tax	2008 to 2010
Value added tax	2010
Withholdings/Payments on account for earned income/income from professional activities	2010
Withholdings/Payments on account for capital gains tax	2010
Withholdings/Payments on account for leases	2010
Withholdings on account for non-resident income tax	2010
Annual return of transactions	2010
Special tax for real estate of non-residents	2010

Assessments were signed on an uncontested basis on 26 January 2017 in respect of value added tax and withholdings/payments on account for earned income and income from professional activities, and on 26 October 2017 assessments were signed on an uncontested basis in respect of withholdings/payments on account for capital gains tax in the following amounts:

ITEM	Thousands of euros
Value added tax	5,295
Withholdings/Payments on account for earned income/income from professional activities	1,424
Withholdings/Payments on account for capital gains tax	1,186

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

These debts were settled on 24 February 2017, except for the amounts owed in respect of withholdings/payments on account for capital gains tax, which were paid on 29 November 2017.

On 11 April 2018, the assessment of income tax for 2008, 2009 and 2010 was signed on an uncontested basis. This did not result in an additional amount payable. In light of the outcome of the tax inspections, disciplinary proceedings were instituted in respect of the revised amounts. Following the issuance of the corresponding penalty agreement of EUR 6.2 million, the debt was paid on 23 May 2018.

In addition, on the same date, 11 April 2018, the assessment of income tax for 2008, 2009 and 2010 was signed on a contested basis in view of differing opinions on the criteria used in the inspection in the entry for business combinations, certain items of earned income, and the deduction for R&D applied by the Entity.

On 3 June 2014, the taxation authorities began an inspection of Caja Insular de Ahorros de Canarias with the aim of verifying compliance with its tax obligations and duties in respect of the following taxes and tax periods:

ITEM	PERIOD
Income tax	2009 to 2010
Value added tax	05/2010 to 12/2010
Withholdings/Payments on account for earned income/income from professional activities	05/2010 to 12/2010
Withholdings/Payments on account for leases	05/2010 to 12/2010
Withholdings on account for non-resident income tax	05/2010 to 12/2010
Withholdings/Payments on account for capital gains tax	05/2010 to 12/2010

In 2019, assessments were signed on an uncontested basis for the following taxes for the periods 05/2012 to 12/2010:

- VAT: the result of the inspection was verified and agreed, without giving rise to any amount payable.
- Withholdings/Payments on account for earned income/income from professional activities: as a result of the inspection, the taxation authorities raised additional taxes of EUR 11.5 thousand.
- Withholdings/Payments on account for leases: the result of the inspection was verified and agreed, without giving rise to any amount payable.
- Withholdings on account for non-resident income tax: as a result of the inspection, the taxation authorities raised additional taxes of EUR 5.5 thousand.
- Withholdings/Payments on account for capital gains tax: as a result of the inspection, the taxation authorities raised additional taxes of EUR 63 thousand.

Tax inspections at BMN

- On 21 October 2014, the taxation authorities of the regional government of Andalusia notified the Bank of the start of verification and inspection proceedings aimed at determining due compliance with its tax obligations and duties in respect of the tax on customer deposits at credit institutions in Andalusia in 2011 and 2012.

The investigation encompassing 2011 ended on 11 November 2015 and no discrepancies were detected with respect to the amounts declared. With respect to 2012, on 5 October 2016 the Andalusian taxation authorities raised an assessment of EUR 14,998 thousand, which was signed by the Bank on a contested basis. On that same date it was notified of the start of disciplinary proceedings, which included a proposed fine of EUR 6,546 thousand. The Andalusian taxation authorities having confirmed the content of the assessment, including the proposed settlement, and the settlement proposed in the disciplinary proceedings, on 16 January 2017 the Group lodged the corresponding appeals. The Bank filed its pleadings in writing along with all the corresponding documentation on 23 June 2017.

In February 2020 the taxation authorities of the regional government of Andalusia notified the rejection of the pleadings filed. In the same year the corresponding claim was lodged at the Madrid High Court for this matter.

- In 2015, the Supreme Court ruled on the tax inspection instituted with respect to Caixa Penedès (currently Fundació Pinnae); such ruling resulted in a balance payable of EUR 741 thousand, mainly in respect of corporate income tax from 2001 to 2004.

In 2019, Bankia paid the corresponding amount as the ruling was enforced.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Inspection proceedings in investees

- On 16 November 2015, the taxation authorities began an inspection of Bankia Habitat S.L.U. with the aim of verifying compliance with its tax obligations and duties in respect of the following taxes and tax periods:

ITEM	PERIOD
Income tax	2011 to 2012
Value added tax	2011 to 2012
Withholdings/Payments on account for leases	09/2011 to 12/2012
Special tax for real estate of non-residents	09/2011 to 12/2012
Withholdings/Payments on account for earned income/income from professional activities	09/2011 to 12/2012

Verification and inspection activities are still ongoing to date.

On 3 April 2018, the assessment for value added tax for 2012, which raised tax payable of EUR 2,436 thousand, EUR 470 thousand of late payment interest and a penalty of EUR 119 thousand, was signed on an uncontested basis, and payment was made on 18 May 2018.

- On 21 June 2018, inspections were commenced at Bankia Inversiones Financieras in order to ascertain compliance with tax obligations and duties in respect of the following items and periods:

ITEM	PERIOD
Income tax	2011 to 2012

Verification and inspection activities are still ongoing to date.

- On 25 July 2018, inspections were commenced at Sociedad Promoción y Participación Empresarial in order to ascertain compliance with tax obligations and duties in respect of the following items and periods:

ITEM	PERIOD
Income tax	2011 to 2012

Verification and inspection activities are still ongoing to date.

- On 10 September 2018, inspections were commenced at Corporación Industrial Bankia SAU in order to ascertain compliance with tax obligations and duties in respect of the following items and periods:

ITEM	PERIOD
Income tax	2011 to 2012

Verification and inspection activities are still ongoing to date.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(26.3) Reconciliation of accounting profit and taxable income

Details of the income tax expense in the accompanying consolidated income statement for 2020 and 2019 reconciled to profit before tax for those years, including a breakdown of the main income tax expense (income) components, are as follows.

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Profit or loss before tax	311,493	755,690
Adjustment to profit	(178,010)	(157,584)
Return on equity instruments	(1,854)	(17,434)
Share of profit or loss of entities accounted for using the equity method	(59,749)	(60,024)
Other permanent differences and other adjustments	(116,407)	(80,126)
Adjusted profit before tax	133,483	598,106
Tax expense (Taxable income * 30%)	(40,045)	(179,432)
Deductions	38,705	51,236
Income tax expense	(1,340)	(128,196)
Income tax adjustments	(96,219)	(98,277)
Income tax (expense)/income related to profit or loss from continuing operations	(81,471)	(213,401)
Income tax for the year (income/(expense))	(97,559)	(226,473)
Effective rate	31.32%	29.97%
Income tax for prior years (income/(expense))	653	5,164
Other changes	15,435	7,908

(26.4) Tax recognised directly in consolidated equity

In addition to the income tax recognised in the consolidated income statements for 2020 and 2019, the Group recognises in equity the taxes relating basically to "Accumulated other comprehensive income" (which includes financial assets at fair value through other comprehensive income, cash flow hedges, hedges of net investments in foreign operations, and exchange differences) and to "Own funds – Other reserves" on the accompanying consolidated balance sheet.

The amount of income tax related to each component of "Accumulated other comprehensive income" in 2020 and 2019 is as follows:

ITEM	31/12/2020	31/12/2019
Income tax relating to items that will not be reclassified to profit or loss	10,684	(672)
Actuarial gains or (-) losses on defined benefit pension plans	3,855	(1,764)
Financial assets – Equity instruments	6,829	1,092
Income tax relating to items that may be reclassified to profit or loss	(3,547)	(5,371)
Foreign currency translation	148	(77)
Cash flow hedges	(2,118)	2,446
Financial assets at fair value through other comprehensive income	(1,577)	(8,411)
Non-current assets and disposal groups held for sale	-	671
Total	7,137	(6,043)

In addition, income tax recognised by the Group directly in "Own funds – Other reserves" on the accompanying consolidated balance sheet is detailed in the movement of deferred tax assets and liabilities (see Note 26.5).

(26.5) Deferred tax assets and liabilities

Royal Decree-Law 14/2013, of 29 December

On 30 November 2013, Royal Decree-Law 14/2013, of 29 December, on urgent measures to adapt Spanish law to European legislation on the supervision and solvency of financial institutions was published in the Official State Gazette ("BOE"). With effect from 1 January 2014, this Royal Decree-Law included additional provision twenty-two, "Conversion of deferred tax assets into a receivable from the taxation authorities", in the Revised Corporate Income Tax Law ("TRLIS" as per the Spanish acronym) approved by Royal Legislative Decree 4/2004, of 5 March.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

In light of this provision, deferred tax assets related to credit loss allowances or other assets deriving from potential insolvency of debtors not related to the taxpayer, provided that article 12.2.a) of the TRLIS is not applicable, as well as those arising from the application of articles 13.1.b) and 14.1.f) of the same law in respect of provisions for or contributions to employee benefit schemes and, where applicable, early retirement schemes, are converted into a receivable from the taxation authorities when any of the following circumstances arise:

- a) The taxpayer recognises accounting losses in its financial statements (audited and approved by the corresponding body). In such cases, the amount of deferred tax assets to be converted is determined by multiplying the total amount thereof by the accounting losses for the period as a percentage of total capital and reserves.
- b) The entity is in liquidation or has been legally declared insolvent.

For conversion of deferred tax assets into a receivable from the taxation authorities in this case, the taxpayer may request a credit from the taxation authorities or offset the receivable against other tax liabilities to the state which the taxpayer itself generates at the time of conversion.

In addition, these deferred tax assets may be exchanged for government debt securities once the legal offset period for tax losses provided for in the law (currently 18 years), computed as of the recognition of the tax assets, has elapsed.

A new section 13 was added to article 19, "*Timing of recognition*", of the TRLIS for the purpose of determining the tax base for income tax purposes, with retrospective effect for tax periods commenced on or after 1 January 2011.

Pursuant to the aforementioned section 13 of article 19 of the TRLIS, credit loss allowances or other assets deriving from potential insolvency of debtors not related to the taxpayer, provided article 12.2.a) of the TRLIS does not apply, as well as those deriving from the application of articles 13.1.b) and 14.1.f) of the same law in respect of provisions for or contributions to employee benefit schemes and, as the case may be, early retirement schemes, which have generated deferred tax assets, are included in the tax base up to the limit of the taxable income before their inclusion and the offset of tax loss carryforwards.

As a result of the new criterion for the timing of recognition, Bankia recalculated the corporate income tax bases for 2011 and 2012, which differ from the bases originally filed within the voluntary period, thus generating new tax bases that were duly notified to the taxation authorities.

Law 27/2014, of 27 November

Law 27/2014, of 27 November, on Corporate Income Tax (the "LIS" as per the Spanish acronym) was enacted on 27 November 2014 and came into force on 1 January 2015, repealing the Revised Income Tax Law (TRLIS) approved by Royal Legislative Decree 4/2004, of 5 March. Article 11.12 of the new LIS includes the text of the repealed Article 19.13 of the TRLIS, with effect from 1 January 2015, although the new LIS introduced, inter alia, certain restrictions and the application of Article 11.12.

Meanwhile, Article 130 of the LIS incorporated the text of additional provision twenty-two of the TRLIS into the new law, stating that the aforementioned deferred tax assets may be exchanged for government debt securities once a period of 18 years as of the last date of the tax period in which the assets were recognised has elapsed. For assets recognised before the enactment of the Law, the calculation period begins from the date of entry into force.

The new LIS included a change in the corporate income tax rate, setting this rate at 28% for 2015 and 25% from 2016. However, according to section 5 of Article 58 of the LIS, consolidated tax groups that include at least one credit institution will be subject to a tax rate of 30%. As Bankia is the parent of its tax group, the tax group continued to pay a CIT rate of 30% in 2015 and thereafter.

Meanwhile Article 26 of the LIS does not stipulate a time limit for the offset of tax loss carryforwards that were available in the period that began when the Law came into effect on 1 January 2015. In addition, transitional provision twenty-three of the LIS does not stipulate any time limit for availing of the deductions to avoid double taxation provided for in Articles 30, 31 and 32 of the TRLIS that had not been used as of the period beginning on or after the date the new law came into effect.

Law 48/2015, of 29 October, on the General State Budgets for 2016

Law 48/2015, of 29 October, on the General State Budgets for 2016 was enacted on 30 October 2015. Effective for tax periods beginning on or after 1 January 2016, this law amended the tax regime to establish the aforementioned conversion, set new conditions for availing of the regime and introduced certain reporting obligations with respect to the deferred tax assets affected by the regulation. It also provided for a transitional regime applicable to deferred tax assets generated before 1 January 2016, whereby the right to conversion could be retained provided certain conditions were met, although to do so a financial contribution had to be paid, which was regulated by the new Additional Provision Thirteen of the LIS.

The amount of the financial contribution at the 2020 year end was EUR 95,137 thousand (EUR 96,082 thousand in 2019), which was recognised under "Tax expense or (-) income related to profit or loss from continuing operations" in the accompanying consolidated income statement.

Royal Decree-Law 3/2016, of 2 December

Lastly, Royal Decree-Law 3/2016 of 2 December, adopting tax measures to consolidate public finances and other urgent social measures, must be considered. This legislation provides that impairment losses on investments that were tax deductible for tax periods up to 2013 but not thereafter must be reversed at a minimum annual amount on a straight-line basis over a five-year period.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Regarding tax periods commenced on or after 1 January 2016, this legislation places a limit of 25% on the offset of taxable income against prior years' tax loss carryforwards for companies with revenue of at least EUR 60 million. The same restrictions apply to the reversal of deferred tax assets provided for in article 11.12 of the LIS. In addition, this Royal Decree-Law places a new limit on the application of deductions for double taxation, specifically 50% of the full income tax charge, and any unused portion may be applied in future tax periods under the same terms and conditions and with no time limit.

Furthermore, for tax periods commenced on or after 1 January 2017, article 3. Two of Royal Decree-Law 3/2016 stipulates that losses incurred on transfers of equity investments are not deductible when the investments in question qualify for the exemption for profit obtained either in the form of dividends or as capital gains arising on the transfer of the investments.

Royal Decree-Law 27/2018, of 28 December

On 28 December, Royal Decree-Law 27/2018 (the "RDL") was approved, adapting the LIS to Bank of Spain Circular 4/2017, as regards first-time application of IFRS 9, with effect from 1 January 2018.

The RDL includes, among others, the following measures:

Impacts of first-time application (Transitional provision thirty-nine)

- The preamble to the RDL states that to reduce the tax effects of this accounting requirement, transitional rules have been put into place, whereby the aforementioned debits and credits to reserve accounts are to be included in the tax base, as soon as they have tax effects pursuant to the tax regulations, in equal parts in each of the first three tax periods beginning on or after 1 January 2018.
- Thus, debits and credits to reserve accounts arising from adjustments for the first-time application of IFRS 9, when due to the application of the tax regulations, shall have tax effects, i.e. they must be taken into consideration when determining the tax base for the 2018 tax period. The legislation concerns debits and credits having tax effects and which are therefore deductible/taxable, and due to their integration in three equal parts the provisions of article 130 on monetisation of deferred tax assets do not apply, thus the deferral in three equal parts does not give rise to monetisable deferred tax assets.
- Such inclusion in equal parts shall continue to apply even if the element in question is derecognised. Only if the taxpayer is dissolved during the aforementioned three-year period shall the remaining amount be included in the tax base of the last tax period, unless it is dissolved as a result of a restructuring operation eligible for the tax neutrality regime.
- In accordance with this legislation, the Entity included an amount of EUR 9,988 thousand.

Accounting for equity instruments under IFRS 9 (Article 17.1 of the TRLIS)

- With the new Circular, investments in equity instruments must be measured at fair value through profit or loss unless the entity elects irrevocably at inception to present these fair value changes in other comprehensive income. If this option is elected, a major change in IFRS 9 is that the gains or losses accumulated in other comprehensive income are not reclassified to profit or loss (as was the case previously with available-for-sale financial assets), but rather to reserves.
- Accordingly, to guarantee their inclusion in the tax base upon disposal, the RDL amends article 17.1 of the LIS, such that changes in value arising from the application of the fair value criterion are not only included when they are to be taken to profit or loss, but also when they should be recognised in a reserve account, if so provided for by a legal or regulatory standard.

Adaptation of the Corporate Income Tax Regulation to Circular 4/2017

- Regarding Circular 4/2017 and the terminology and credit risk loss model adopted therein, the deductibility criteria are set out in the Corporate Income Tax Regulation and thus far there have been no amendments thereto.
- However, the introduction to the RDL states the following: "Lastly, until approval is given for adaptation of the regulatory provisions for credit risk allowances and provisions of financial institutions, the provisions currently in force are considered to be applicable, albeit under the terms used in the new Circular."

Deferred tax assets and liabilities

Pursuant to the tax legislation in force in the different countries in which the consolidated companies are located, certain temporary differences have arisen that must be considered when quantifying the related income tax expense.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

The sources of deferred taxes recognised on the balance sheets at 31 December 2020 and 2019, bearing in mind the impact of article 19.3 of the TRLIS, now article 11.12 of the LIS, are as follows:

(in thousands of euros)

ITEM	31/12/2020	31/12/2019
Monetisable:	7,430,272	7,466,027
Credit loss allowances	5,323,201	5,357,622
Impairment losses on foreclosed assets	1,221,078	1,221,078
Provisions for pension funds	280,811	280,811
Other originating at Group companies	605,182	606,516
Non-monetisable:	2,990,354	2,954,869
Credit loss allowances	322,627	210,027
Impairment losses on foreclosed assets	78	3,778
Due to impairment losses posted on equity instruments	42,225	48,355
Provisions for pension funds	7,875	7,875
Other charges	140,123	177,815
Unused tax credits	129,864	139,606
Losses on financial assets	14,685	13,505
Recognised unused tax losses	2,332,877	2,353,908
Total deferred tax assets	10,420,626	10,420,896

(in thousands of euros)

ITEM	31/12/2020	31/12/2019
Deferred tax liabilities arising at the Bank	404,030	452,530
Unrealised gains on financial assets	264,391	307,949
Unrealised gains on properties	131,308	136,194
Other items	8,331	8,387
Deferred tax liabilities arising at other Group companies	13,596	15,083
Total deferred tax liabilities	417,626	467,613

Movement in 2020 and 2019 was as follows:

2020

(in thousands of euros)

ITEM	Balances at 31/12/2019	(Charged)/credited to the income statement (**)	(Charged)/credited to equity (*)	Other changes	Balances at 31/12/2020
Deferred tax assets	10,420,896	41,902	1,372	(43,544)	10,420,626
Deferred tax liabilities	(467,613)	46,372	2,475	1,140	(417,626)
Total	9,953,283	88,274	3,847	(42,404)	10,003,000

(*) Not including taxes related to non-current assets held for sale.

(**) Including expenses for taxes related to non-current assets held for sale.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

2019

(in thousands of euros)

ITEM	Balances at 31/12/2018	(Charged)/credited to the income statement (**)	(Charged)/credited to equity (*)	Other changes	Balances at 31/12/2019
Deferred tax assets	10,603,406	(190,389)	9,395	(1,516)	10,420,896
Deferred tax liabilities	(555,799)	79,232	7,654	1,300	(467,613)
Total	10,047,607	(111,157)	17,049	(216)	9,953,283

(*) Not including taxes related to non-current assets held for sale.

(**) Including expenses for taxes related to non-current assets held for sale.

Details of the Bank's tax loss carryforwards at 31 December 2020, indicating the year in which they arose, are shown below. These details do not include the effects of the potential tax losses applied in the income tax settlement for 2020, which will be filed in July 2021:

(in thousands of euros)

Year in which the tax loss arose	Amount of the tax loss available for offset	Amount of the deferred tax asset recognised (tax credit)
2010	597,244	167,797
2011 (*)	1,238,294	364,188
2012 (*)	8,702,554	1,771,092
2016	33,896	10,106
2017	94,550	28,365
TOTAL	10,666,538	2,341,548

(*) As indicated above, the tax losses for 2011 and 2012 were calculated estimating the impact of article 19.13 of the TRLIS approved by Royal Decree-Law 14/2013, of 29 December, on urgent measures to adapt Spanish law to European legislation on the supervision and solvency of financial institutions.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Details of unused deductions available for offset by the Bank at 31 December 2020, indicating the year in which they arose, are shown below. These details do not show the effects of the potential deductions used in the income tax settlement for 2020, which will be filed in July 2021:

(in thousands of euros)

Year in which the deductions arose	Amount of the deduction or tax relief available for offset	Amount of the deferred tax asset recognised
2005 - Other deductions	102	-
2004 - Deduction for reinvestment	9	9
2005 - Deduction for reinvestment	4	4
2006 - Deduction for reinvestment	20	20
2007 - Deduction for reinvestment	43	43
2007 - Deduction for R&D&i	3	3
2008 - Deduction for reinvestment	23,201	9
2008 - Deduction for R&D&i	1,326	1,079
2009 - Deduction for reinvestment	7,472	7,472
2009 - Deduction for R&D&i	3,657	1,097
2009 - Other deductions	387	-
2009 - Deductions for donations (Law 49/2002)	419	-
2010 - Deduction for reinvestment	17,653	17,653
2010 - Deduction for R&D&i	2,967	1,372
2010 - Other deductions	338	-
2010 - Deductions for donations (Law 49/2002)	549	90
2011 - Deduction for reinvestment	3,949	3,949
2011 - Deduction for reinvestment (Bankia Inversiones)	854	-
2011 - Deduction for R&D&i	2,608	2,608
2011 - Other deductions	151	11
2011 - Deduction for internal double taxation (Bankia Inversiones)	7,252	-
2012 - Deduction for internal double taxation	9,598	9,598
2012 - Deduction for internal double taxation (Bankia Inversiones)	8,936	-
2012 - Deduction for international double taxation	33	33
2012 - Deduction for reinvestment	1,347	1,347
2012 - Deduction for R&D&i	1,537	1,537
2012 - Other deductions	1	1
2013 - Deduction for internal double taxation	21,323	21,323
2013 - Deduction for internal double taxation (Bankia Inversiones)	13,431	-
2013 - Deduction for international double taxation	11	11
2013 - Deduction for reinvestment	175	175
2013 - Deduction for R&D&i	7,939	7,939
2013 - Other deductions	215	3
2014 - Deduction for internal double taxation	25,101	24,370
2014 - Deduction for internal double taxation (Bankia Inversiones)	9,141	-
2014 - Deduction for international double taxation	1,734	1,734
2014 - Deduction for reinvestment	606	606
2014 - Deduction for R&D&i	5,459	5,459
2014 - Other deductions	434	283
2015 - Deduction for international double taxation	1,686	1,654
2015 - Deduction for reinvestment	841	841
2015 - Deduction for R&D&i	6,158	6,158
2015 - Other deductions	801	-
2016 - Deduction for international double taxation	1,457	86
2016 - Deduction for R&D&i	6,607	6,607
2016 - Other deductions	1,651	1,418
2017 - Deduction for international double taxation	1,208	18
2017 - Deduction for R&D&i	7,011	7,011
2017 - Other deductions	1,729	1,729
2018 - Deduction for international double taxation	1,144	-
2018 - Deduction for R&D&i	4,322	2,985
2018 - Other deductions	1,218	1,218
2019 - Deduction for international double taxation	1,079	-
2019 - Deduction for R&D&i	6,011	-
2019 - Other deductions	1,185	-
Total	224,093	139,563

(26.6) Other tax information

In accordance with current legislation, Bankia's individual financial statements for years prior to 2020 provide additional tax information related to transactions carried out in previous years pursuant to Chapter VIII of Title VII of the Revised Corporate Income Tax Law (TRLIS) approved by Royal Legislative Decree 4/2004, of 5 March.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(26.7) Information regarding the assessment of the recoverability of tax assets

To assess the recoverability of the net deferred tax assets recognised by the Group at 31 December 2020, amounting to EUR 10,003 thousand (EUR 9,953 thousand at 31 December 2019), the directors analysed, based on the nature of the assets, the ability to generate sufficient taxable profit against which the deferred tax assets can be utilised. This analysis was based on the assumptions, conditions and estimates in the Group's approved budget for 2021 and considering the situation arising from the COVID-19 pandemic (see Note 1.16). A projection was made on these forecasts for the period from 2022 to 2032 based on interest rate curve projections for this period and on the trends in the basic variables of the budget, and from there a uniform projection was made, maintaining the basic variables constant (growth, earnings, inflation, etc.), with a full recovery of the net tax assets possible within a period of no more than 20 years. As with any estimates based on assumptions, these estimates may need to be updated in light of future events, which could lead to a prospective change in the net tax assets recognised by the Group, pursuant to the accounting principle explained in Note 1.4.

In addition, regarding the assessment of the recoverability of deferred tax assets, it should be noted that, in accordance with Royal Decree-Law 14/2013, of 29 December, on urgent measures to adapt Spanish law to European legislation on the supervision and solvency of financial institutions, and articles 11.12 and 130 of Law 27/2014, of 27 November, on Corporate Income Tax (the LIS), at 31 December 2020, the Group had deferred tax assets amounting to EUR 7,430 million (EUR 7,466 million at 31 December 2019) that meet the requirements under this regulation. Accordingly, their future recovery is guaranteed through the monetisation mechanisms established in aforementioned RDL 14/2013 and article 130 of the LIS, bearing in mind the amendments made for tax periods commenced on or after 1 January 2016 by Law 48/2015, of 29 October, on the General State Budgets for 2016, although to this end it must pay a financial contribution as regulated by the new Additional Provision Thirteen of the LIS.

(27) Other significant disclosures

(27.1) Asset transfers

(27.1.1) Loan securitisation

The Group entities have performed various asset transfer transactions whereby they transferred the rights over certain loans and credits in their portfolio to different securitisation special purpose vehicles or third parties. These assets were derecognised when substantially all the associated risks and rewards were transferred. Where the associated risks have not been substantially transferred, the securitised assets have been recognised on the consolidated balance sheet (see Notes 2.2.2 and 2.7).

The consolidation of securitisation special purpose vehicles entails the elimination of the related transactions between Group entities, including most notably: loans to special purpose vehicles, liabilities associated with assets not derecognised, credit enhancements granted to special purpose vehicles and bonds acquired by Group entities.

"Loans and advances - Customers" include loans transferred to third parties through securitisation for which risk is retained, even if only partially, and which in accordance with applicable accounting standards therefore cannot be derecognised from the balance sheet. Details of securitised loans by nature of the underlying financial instrument and securitised loans that qualify for derecognition from the balance sheet (see Note 2.2.2) are shown in the table below.

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Derecognised from the balance sheet	1,379,330	1,471,706
Of which mortgage assets securitised through:	1,360,381	1,459,950
Collateralised mortgage bonds	-	-
Mortgage transfer certificates	1,360,381	1,459,950
Other securitised assets	18,949	11,756
Foreclosed assets deriving from securitised mortgage assets	-	-
Held on the balance sheet	8,491,855	9,567,031
Of which mortgage assets securitised through:	8,137,843	9,213,001
Collateralised mortgage bonds	262,213	330,046
Mortgage transfer certificates	7,875,630	8,882,955
Other securitised assets	10,359	11,530
Foreclosed assets deriving from securitised mortgage assets	343,653	342,500

In 2019, the Group transferred the economic rights of a portfolio of loans and credits through mortgage transfer certificates to a vehicle wholly owned by a third party, resulting in their derecognition; and the vehicle then transferred them to a Spanish asset securitisation fund (Verde Iberia Loans, Fondo de Titulización). They amounted to EUR 1,209,643 thousand at 31 December 2019.

In addition, in 2019, the Group transferred the economic rights of a portfolio of loans and credits, mostly non-performing mortgage loans, through mortgage transfer certificates to a vehicle wholly owned by a third party, resulting in their derecognition; and the vehicle then transferred them to a Spanish asset securitisation fund (SLF, Fondo de Titulización). They amounted to EUR 262,063 thousand at 31 December 2019.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Regarding the transferred loans and credits, for a total amount of EUR 1,471,706 thousand at 31 December 2019, contributed by the buyers to those securitisation funds, the Group does not manage the transferred loans and credits or retain expected credit losses or potential variability in net cash flows, nor has it granted subordinated financing or credit facilities in favour of the securitisation funds.

Appendix V shows the amounts of loan securitisation transactions on the consolidated balance sheet at 31 December 2020 and 2019.

(27.1.2) Repurchase and resale agreements

At 31 December 2020, the Group had sold financial assets under repurchase agreements amounting to EUR 9,117,290 thousand (EUR 19,900,276 thousand at 31 December 2019), and had purchased financial assets under resale agreements amounting to EUR 2,934,850 thousand (EUR 3,524,537 thousand at 31 December 2019), as follows:

(in thousands of euros)				
ITEM	31/12/2020		31/12/2019	
	Repurchase agreement	Resale agreement	Repurchase agreement	Resale agreement
Government debt securities	1,243,041	261,967	10,102,078	467,992
Other debt securities	7,874,249	2,672,883	9,798,198	3,056,545
Total	9,117,290	2,934,850	19,900,276	3,524,537

The sale of financial assets under a repurchase agreement inherently includes the delivery or pledge of these assets in guarantee of the transaction. At 31 December 2020, the average term of these repurchase agreements and, accordingly, of the assets provided as collateral was 10 months (13 months at 31 December 2019).

(27.1.3) Assets assigned to other own and third-party obligations

At 31 December 2020 and 2019, the Group had assigned significant assets to guarantee its own obligations amounting to EUR 73,713 million and EUR 76,979 million, respectively. These amounts mainly reflected loans linked to the issue of long-term covered bonds (see Note 12 and Appendix VIII) which, pursuant to the Mortgage Market Law, are considered eligible to guarantee the issue of covered bonds.

(27.2) Off-balance sheet exposures

Off-balance sheet exposures comprise loan commitments, financial guarantees and other commitments given, whether revocable or irrevocable.

Loan commitments given are irrevocable commitments, or revocable only in the event of a material adverse change, to provide financing under certain previously stipulated terms and conditions, such as balances drawable by third parties within the limits defined previously by the Group.

Financial guarantees given are contracts that require the Group, when it acts as issuer in the ordinary course of its business, to make specified payments to reimburse a creditor for a loss it incurs, because a specified debtor fails to make payment where due in accordance with the original or modified terms of a debt instrument, irrespective of its legal form, which may include, among others, a guarantee, a financial surety, an insurance contract or a credit derivative.

Contingent commitments given are those off-balance sheet exposures included in Annex 1 of Regulation (EU) No 575/2013 of the European Parliament and of the Council, of 26 June 2013, that do not meet the definition of loan commitment or financial guarantee. They include, among others, non-financial guarantees.

Details of these guarantees given and drawable by third parties at 31 December 2020 and 2019 are as follows:

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Loan commitments given	28,656,212	23,256,169
Immediately drawable	20,244,516	16,661,672
Conditionally drawable	8,411,696	6,594,497
Financial guarantees given	341,602	376,728
Contingent commitments given	14,229,697	13,071,778
Other bank guarantees and indemnities and other contingent exposures	8,215,211	7,658,488
Irrevocable documentary credits issued	488,912	462,430
Irrevocable documentary credits confirmed	151,070	204,772
Other contingent exposures	416	416
Other commitments given ⁽¹⁾	5,374,088	4,745,672
Total	43,227,511	36,704,675

(1) Includes, mainly, commitments to purchase financial assets and documents presented for collection in the various clearing systems.

Note 3.1 shows the maximum credit risk assumed by the Group in relation to these instruments at 31 December 2020 and 2019, and contains other information relating to the credit risk assumed by the Group in this connection.

A significant portion of these guarantees will expire without any payment obligation materialising for the consolidated companies. Therefore, the aggregate balance of these commitments cannot be considered as an actual future need for financing or liquidity to be provided by the Group to third parties.

The income generated on guarantee instruments is recognised in the consolidated income statement under "Fee and commission income" and "Interest income" (in amounts corresponding to the present value of the fees), calculated by applying the interest rate on the underlying contract to the face value of the guarantee.

The provisions established to cover these guarantees, which are calculated by applying similar criteria to those used to calculate the impairment of financial assets at amortised cost, are recognised on the consolidated balance sheet as "Provisions - Commitments and guarantees given" (see Note 20).

The maximum exposure to credit risk, i.e. the amount payable if the guarantees and commitments given are enforced, is as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Loan commitments given	28,656,212	23,256,169
<i>Of which, classified as performing exposures under special monitoring</i>	1,469,884	396,192
<i>Of which, classified as non-performing</i>	341,601	361,942
<i>Recognised as liabilities on the balance sheet ⁽¹⁾</i>	82,117	91,017
Total loan commitments given	28,656,212	23,256,169
Financial guarantees given	341,602	376,728
<i>Of which, classified as performing exposures under special monitoring</i>	34,877	13,774
<i>Of which, classified as non-performing</i>	41,851	63,903
<i>Recognised as liabilities on the balance sheet ⁽¹⁾</i>	19,394	10,224
Total financial guarantees given	341,602	376,728
Other commitments given	14,229,697	13,071,778
<i>Of which, classified as performing exposures under special monitoring</i>	911,894	726,650
<i>Of which, classified as non-performing</i>	450,264	535,639
<i>Recognised as liabilities on the balance sheet ⁽¹⁾</i>	173,388	200,476
Total other commitments given	14,229,697	13,071,778
Total guarantees given and drawable by the third parties	43,227,511	36,704,675

(1) Amount related to "Provision - Commitments and guarantees given" (see Note 20).

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(27.3) Third-party funds managed and marketed by the Group

The breakdown of off-balance sheet funds managed and marketed by the Group at 31 December 2020 and 2019 is as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Investment companies and funds	21,109,177	19,809,312
Pension funds	8,035,603	7,825,939
Customer portfolios managed on a discretionary basis	4,173,431	3,495,036
Total	33,318,211	31,130,287

In addition, the Group markets off-balance sheet customer funds managed by third parties outside the Group. These amounted to EUR 12,246,681 thousand at 31 December 2020 (EUR 11,377,769 thousand at 31 December 2019).

On 29 May 2020 Bankia reached an agreement with Cecabank, S.A. for the transfer of its CIU and pension funds custodian business. Once the conditions precedent of the agreement had been reached, which involved obtaining the relevant administrative authorisations, the business was derecognised at 31 December 2020.

The fixed amount of the consideration received was EUR 170 million, without considering subsequent additional collections subject to the achievement of certain volume targets. The net gain recorded in Profit or (-) loss from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations after closing the transaction amounted to EUR 155 million (see note 45), +after the transaction amounted to EUR 155 million, with a liability recognised for the remaining amount which will be recorded against profit or loss to the extent that the Group meets the performance commitments set out in the contract for a period of ten years from the signature date.

In addition, the contract includes certain safeguards agreed between the parties which are usual in this type of contract. These safeguards are for contingent situations and include, inter alia, the option for a third party successor, in the event of a change of control in Bankia's shareholding, to unilaterally terminate the contract in advance within a period of three months from the effective date of Bankia's change of control. The third party successor may potentially exercise this option and it is therefore an event beyond the control of Bankia's Management.

In the event of the unilateral rescission of the contract, which would give rise to the third party successor's acquisition of the transferred custodian business, the amount currently payable by a third party successor would be equivalent to the consideration received to date and therefore similar to the fair value attributed to the aforementioned business.

(27.4) Leases

(27.4.1) Finance leases

In the normal course of its business the Group acts as lessor in transactions which, pursuant to the provisions of the applicable regulations, are classified as finance leases. Agreements drawn up in this regard are performed in accordance with general market practices for such transactions.

Finance leases granted by the Group amounted to EUR 965,077 thousand at 31 December 2020 (EUR 1,108,999 thousand at 31 December 2019), and are recognised under "Financial assets at amortised cost - Loans and advances - Customers" on the consolidated balance sheet at that date. Impairment losses recognised on these transactions amounted to EUR 40,739 thousand at 31 December 2020 (EUR 41,161 thousand at 31 December 2019).

The gross investment in the lease is the sum of the minimum payments receivable from the finance lease plus any unguaranteed residual value accruing to the lessor. Assets leased under finance leases are recognised at the present value of the lease payments payable by the lessee, plus the guaranteed and unguaranteed residual value, excluding interest expenses and value-added tax.

The breakdown of these items is as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Present value of minimum lease payments receivable (1)	920,020	1,061,604
Unguaranteed residual values	45,057	47,395
Total gross investment in finance leases	965,077	1,108,999

⁽¹⁾ Includes the value of the purchase option whose collection is guaranteed for the Group.

Unaccrued finance income from the Bank's finance leases amounted to EUR 46,146 thousand at 31 December 2020 (EUR 60,415 thousand at 31 December 2019).

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Meanwhile, the breakdown by maturity of the gross investment and the present value of the minimum payments receivable is presented below:

At 31 December 2020

(in thousands of euros)		
MATURITY	Gross investment	Present value of minimum payments receivable
Up to 1 year	356,757	346,142
1 to 5 years	502,028	477,734
More than 5 years	106,292	96,144
Total	965,077	920,020

At 31 December 2019

(in thousands of euros)		
MATURITY	Gross investment	Present value of minimum payments receivable
Up to 1 year	357,219	351,528
1 to 5 years	606,107	575,349
More than 5 years	145,673	134,727
Total	1,108,999	1,061,604

(27.4.2) Operating leases

In relation to lease transactions which, pursuant to the provisions of prevailing regulations, must be considered as operating leases and in which the Group acts as the lessee, the amount of leases and subleases recognised as an expense in the consolidated income statement totalled EUR 8,500 thousand for the year ended 31 December 2020 (EUR 7,947 thousand at 31 December 2019).

(27.5) Exchanges of assets

In the years ended 31 December 2020 and 2019, the Group did not carry out any significant exchanges of assets. In this regard, the acquisition by any means of tangible assets in payment of debts arranged by the Group's debtors is not considered an exchange of assets. Information concerning this type of transaction is shown in Note 2.8 above.

(28) Contribution to consolidated profit or loss by company

The contribution by consolidated company of the Bankia Group to consolidated profit or loss for the years ended 31 December 2020 and 2019 is as follows:

(in thousands of euros)				
ITEM	31/12/2020		31/12/2019	
	Fully consolidated Group entities	Share of profit or loss of entities accounted for using the equity method	Fully consolidated Group entities	Share of profit or loss of entities accounted for using the equity method
Bankia Fondos, S.G.I.I.C., S.A.	38,226	-	33,119	-
Bankia Mediación, Operador de Banca Seguros Vinculado, S.A.U.	3,951	-	5,117	-
Bankia Pensiones, S.A., Entidad Gestora de Fondos de Pensiones	19,805	-	19,048	-
Bankia, S.A.	124,679	-	400,200	-
Corporación Industrial Bankia, S.A.U.	(557)	-	(1,713)	-
Bankia Mapfre Vida, S.A., de Seguros y Reaseguros	-	65,299	-	49,810
Caja de Seguros Reunidos, Compañía de Seguros y Reaseguros, S.A., "CASER"	-	4,500	-	10,157
Other companies	(16,050)	(10,050)	25,641	57
TOTAL	170,054	59,749	481,412	60,024

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(29) Interest income

The breakdown of this item in the accompanying consolidated income statement for the years ended 31 December 2020 and 2019 is as follows:

(in thousands of euros)		
ITEM	Income / (Expenses)	
	31/12/2020	31/12/2019
By counterparty		
Debt securities	260,076	316,974
General government	245,846	298,303
Credit institutions	695	1,181
Other financial corporations	1,664	2,323
Non-financial corporations	11,871	15,167
Loans and advances ⁽¹⁾	1,829,161	2,009,424
General government	44,812	52,415
Credit institutions	4,951	6,916
Other financial corporations	12,331	11,649
Non-financial corporations	669,856	687,303
Households	1,097,211	1,251,141
Other assets ⁽²⁾	256,449	166,294
Derivatives – Hedge accounting, interest rate risk	(56,718)	(33,403)
Total	2,288,968	2,459,289

(1) Of which, interest income from non-performing assets at 31 December 2020 was EUR 90,588 thousand (EUR 195,093 thousand at 31 December 2019).

(2) At 31 December 2020, this includes EUR 159,682 thousand of interest accrued on deposits taken under the framework of the TLTRO programme (EUR 56,141 thousand at 31 December 2019) (see Note 19).

(30) Interest expenses

The breakdown of this item in the accompanying consolidated income statement for the years ended 31 December 2020 and 2019 is as follows:

(in thousands of euros)		
ITEM	(Expenses) / Income	
	31/12/2020	31/12/2019
By counterparty		
Deposits	(286,729)	(343,205)
Central banks	(1,385)	(3,979)
General government	(156)	(1,999)
Credit institutions	(33,665)	(40,923)
Other financial corporations	(216,677)	(272,101)
Non-financial corporations	(24,800)	(5,053)
Households	(10,046)	(19,150)
Debt securities issued	(448,789)	(474,733)
Other financial liabilities	(6,566)	(21)
Derivatives – Hedge accounting, interest rate risk	400,018	450,385
Other liabilities ⁽¹⁾	(42,784)	(68,688)
Total	(384,850)	(436,262)

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(1) Of which, in 2020, finance costs of EUR 6,559 thousand accrued on financial liabilities associated with property, plant and equipment acquired under operating leases (EUR 12,810 thousand in 2019).

(31) Dividend income

The breakdown of this item in the accompanying consolidated income statement for the years ended 31 December 2020 and 2019 is as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Financial assets held for trading	17	185
Non-current assets held for sale – equity instruments	1,837	17,249
Total	1,854	17,434

(32) Share of profit or loss of entities accounted for using the equity method

The breakdown of this item in the accompanying consolidated income statement for the years ended 31 December 2020 and 2019 is as follows:

(in thousands of euros)		
	(Expenses) / Income	
ITEM	31/12/2020	31/12/2019
Associates	61,524	63,875
Joint ventures	(6,275)	(3,851)
Associates ANCV	4,500	-
Total	59,749	60,024

This caption includes the share of attributable profit or loss after tax of each associate and joint venture of the Bankia Group (see Appendices III and IV). Thus, the Group's income tax expense shown in the accompanying consolidated income statement does not reflect any tax effect in respect of profits or losses of entities accounted for using the equity method.

Details of the contribution to profit or loss by the most relevant entities accounted for using the equity method are disclosed in Note 28 above.

In addition, the consolidated balance sheet includes goodwill under “Investments in joint ventures and associates - Associates” at 31 December 2020 and 2019 (see Note 14).

(33) Fee and commission income

The breakdown of this item in the accompanying consolidated income statement for the years ended 31 December 2020 and 2019 is as follows:

(in thousands of euros)		
	Income	
ITEM	31/12/2020	31/12/2019
Contingent exposures	67,184	65,584
Contingent commitments	41,807	33,528
Collection and payment services	523,815	414,645
Securities services	82,527	68,660
Marketing of non-banking financial products	342,106	343,025
Other fees and commissions	223,950	242,197
Total	1,281,389	1,167,639

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(34) Fee and commission expenses

The breakdown of this item in the accompanying consolidated income statement for the years ended 31 December 2020 and 2019 is as follows:

(in thousands of euros)		
ITEM	(Expenses)	
	31/12/2020	31/12/2019
Fees and commissions assigned to other entities and correspondents	(36,035)	(48,506)
Fee and commission expenses on securities transactions	(5,800)	(7,407)
Other fees and commissions	(26,748)	(31,083)
Total	(68,583)	(86,996)

(35) Gains or losses on financial assets and liabilities

The breakdown of this item in the accompanying consolidated income statement for the years ended 31 December 2020 and 2019 by financial instrument portfolio, is as follows:

(in thousands of euros)		
ITEM	(Expenses) / Income	
	31/12/2020	31/12/2019
Origin of transactions		
Gains or (-) losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss, net	154,400	288,744
Financial assets at fair value through other comprehensive income	20,454	213,138
Financial assets at amortised cost - Debt securities	127,968	71,247
Financial liabilities at amortised cost	5,978	4,359
Gains or (-) losses on financial assets and liabilities held for trading, net	15,832	19,870
Gains or (-) losses on non-trading financial assets mandatorily at fair value through profit or loss, net	(516)	905
Gains or (-) losses from hedge accounting, net	(22,787)	(11,531)
Total	146,929	297,988

The most significant gains in 2020, amounting to EUR 127 million in 2020 (EUR 71 million in 2019), correspond to sales of debt securities classified as financial assets at amortised cost, mainly including public and private debt securities, considered immaterial and infrequent, based on the business model criteria of holding assets to obtain contractual cash flows (see Note 2.2.5).

The most significant gains for 2019, amounting to EUR 213 million, reflect the sale of financial assets at fair value through other comprehensive income, corresponding mainly to public and private debt securities.

(36) Other operating income

The breakdown of this item in the accompanying consolidated income statement for the years ended 31 December 2020 and 2019 is as follows:

(in thousands of euros)		
ITEM	Income	
	31/12/2020	31/12/2019
Income from investment property (Note 15.2)	16,377	20,411
Financial fees and commissions offsetting direct costs	22,574	26,366
Other items	25,866	8,264
Total	64,817	55,041

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(37) Other operating expenses

The breakdown of this item in the accompanying consolidated income statement for the years ended 31 December 2020 and 2019 is as follows:

(in thousands of euros)		
ITEM	(Expenses)	
	31/12/2020	31/12/2019
Contribution to Deposit Guarantee Fund and Resolution Fund (Note 1.10)	(234,253)	(231,063)
Other operating expenses	(80,825)	(73,385)
Total	(315,078)	(304,448)

(38) Administrative expenses – Staff expenses

Details of this item in the accompanying consolidated income statement for the years ended 31 December 2020 and 2019, by type of cost, are as follows:

(in thousands of euros)		
ITEM	(Expenses) / Income	
	31/12/2020	31/12/2019
Salaries and wages	(779,619)	(816,694)
Social Security	(223,736)	(227,330)
Contributions to defined contribution pension plans (Note 38.3)	(39,340)	(50,309)
Contributions to defined benefit pension plans	(4,234)	(76)
Termination benefits	(6,656)	(4,375)
Training expenses	(3,851)	(7,656)
Other staff expenses	(12,339)	(12,980)
Total	(1,069,775)	(1,119,420)

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(38.1) Composition and distribution by gender of employees

The number of Group employees, by gender and professional category (including executive directors and senior executives at the Bank) at 31 December 2020 and 2019, and the average headcount for the years ended 31 December 2020 and 2019, are as follows:

REMUNERATION LEVELS	Workforce at 31 December 2020			Average headcount for 2020	Average headcount of employees with disability rating $\geq 33\%$ 2020
	Men	Women	Year-end workforce		
Directors	3	-	3	3	-
Senior executives	8	1	9	9	-
Other employees by remuneration level	6,780	8,730	15,510	15,405	185
Level I	86	11	97	97	-
Level II	509	166	675	677	6
Level III	666	305	971	970	8
Level IV	998	745	1,743	1,747	18
Level V	1,226	1,338	2,564	2,564	23
Level VI	981	1,388	2,369	2,369	32
Level VII	756	1,409	2,165	2,154	29
Level VIII	268	651	919	902	17
Level IX	426	871	1,297	1,266	10
Level X	709	1,616	2,325	2,272	35
Level XI	80	145	225	223	6
Level XII	7	9	16	17	-
Level XIII	63	71	134	135	-
Level XIV	1	3	4	6	-
Group 2 and others	4	2	6	6	1
Total Bankia, S.A.	6,791	8,731	15,522	15,417	185
Other Group companies	191	237	428	423	3
Total	6,982	8,968	15,950	15,840	188

(1) The Bankia Group has adopted alternative measures for complying with the reserve quota for employees with disabilities.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

REMUNERATION LEVELS	Workforce at 31 December 2019			Average headcount for 2019	Average headcount of employees with disability rating >= 33% 2019
	Men	Women	Year-end workforce		
Directors	3	-	3	3	-
Senior executives	8	1	9	9	-
Other employees by remuneration level	6,823	8,774	15,597	15,483	182
Level I	84	9	93	94	-
Level II	464	147	611	611	5
Level III	688	302	990	995	9
Level IV	995	736	1,731	1,737	16
Level V	1,150	1,236	2,386	2,390	23
Level VI	990	1,376	2,366	2,365	32
Level VII	604	1,058	1,662	1,653	21
Level VIII	427	943	1,370	1,358	22
Level IX	347	732	1,079	1,033	8
Level X	793	1,764	2,557	2,521	27
Level XI	197	371	568	559	18
Level XII	15	24	39	39	-
Level XIII	-	-	-	-	-
Level XIV	66	75	141	124	-
Group 2 and others	3	1	4	4	1
Total Bankia, S.A.	6,834	8,775	15,609	15,495	182
Other Group companies	187	239	426	423	3
Total	7,021	9,014	16,035	15,918	185

(1) The Bankia Group has adopted alternative measures for complying with the reserve quota for employees with disabilities.

(38.2) Provisions for pensions and similar obligations (obligations to employees) and insurance contracts linked to pensions

As described in Note 2.13, the Group has undertaken certain post-employment defined benefit obligations with its employees. Details of the Bank's pension obligations and long-term benefits, which are recognised on the accompanying consolidated balance sheets, are as follows:

(in thousands of euros)

ITEM	31/12/2020	31/12/2019
Post-employment benefits	905,197	1,002,147
Other long-term employee benefits	160,628	227,057
Obligations assumed from the labour agreement entered into as a result of the incorporation of the BFA Group	2	1,386
Other long-term benefits	160,626	225,671
(Less) – Assets covering obligations	(434,931)	(194,539)
Total benefits net of plan assets	630,894	1,034,665
Other obligations	-	-
Total obligations for pensions funds and similar obligations	630,894	1,034,665
<i>Of which:</i>		
Debit balances - Assets (1)	(13,600)	(3,559)
Credit balances - Liabilities (2)	644,494	1,038,224
Insurance contracts linked to post-employment benefits (defined benefit)	483,038	836,660
Insurance contracts linked to other long-term obligations	160,541	225,252
Total insurance contracts (3)	643,579	1,061,912

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

- (1) Included in "Other assets" on the accompanying consolidated balance sheets.
- (2) Recognised under "Provisions - Pensions and other post-employment defined benefit obligations" on the accompanying consolidated balance sheets (see Note 20).
- (3) The Group has taken out insurance policies to cover the portion of the aforementioned obligations that do not qualify as plan assets, irrespective of the provisions included on the consolidated balance sheet in accordance with current legislation, which are recognised under "Other assets - Insurance contracts linked to pensions" (see Note 17).

The tables below provide a breakdown at 31 December 2020 and 2019 of total related obligations, distinguishing between those that exceed the value of plan assets and are therefore recognised under "Provisions - Pensions and other post-employment defined benefit obligations" on the consolidated balance sheet, and those for which the value of the plan assets vis-à-vis related companies exceeds the present value of the obligation, which, pursuant to applicable regulations, are recognised at their net amount in "Other assets - Other" on the consolidated balance sheet:

31 December 2020

(in thousands of euros)							
ITEM	Post-employment benefits			Early retirement and other long-term obligations			
	Value of the obligation (I)	Value of plan assets (II)	Total (III = I – II)	Value of the obligation (IV)	Value of plan assets (V)	Total (VI = IV – V)	Total (III + VI)
Commitments for which the value of the obligation exceeds the value of the plan assets recognised under "Provisions – Pensions and other post-employment defined benefit obligations"	676,967	193,099	483,868	160,628	2	160,626	644,494
Commitments for which the value of the obligations is less than the value of the plan assets recognised under "Other assets – Other"	228,230	241,830	(13,600)	-	-	-	(13,600)
Total at 31 December 2020	905,197	434,929	470,268	160,628	2	160,626	630,894

31 December 2019

(in thousands of euros)							
ITEM	Post-employment benefits			Early retirement and other long-term obligations			
	Value of the obligation (I)	Value of plan assets (II)	Total (III = I – II)	Value of the obligation (IV)	Value of plan assets (V)	Total (VI = IV – V)	Total (III + VI)
Commitments for which the value of the obligation exceeds the value of the plan assets recognised under "Provisions – Pensions and other post-employment defined benefit obligations"	812,596	294	812,302	227,057	1,135	225,922	1,038,224
Commitments for which the value of the obligations is less than the value of the plan assets recognised under "Other assets – Other"	189,551	193,110	(3,559)	-	-	-	(3,559)
Total at 31 December 2019	1,002,147	193,404	808,743	227,057	1,135	225,922	1,034,665

(38.3) Post-employment benefits

Details of the various post-employment benefit obligations assumed by the Group under both defined benefit and defined contribution plans are as follows:

Defined contribution plans

As indicated in Note 2.13 above, the Bank has assumed the obligation of making certain contributions to its employees' external pension schemes that qualify as defined contribution plans under applicable legislation.

The Group accrued contributions to external pension funds in the amount of EUR 52,137 thousand in 2020 of which EUR 12,797 thousand were covered by the employee pension plan and EUR 39,340 thousand are recognised under "Administrative expenses - Staff expenses" in the consolidated income statement for the year then ended. In 2019 the Bank accrued contributions to external pension funds in the amount of EUR 51,628 thousand of which EUR 1,318 thousand were covered by the employee pension plan and EUR 50,309 thousand are recognised under "Administrative expenses - Staff expenses" (see Note 38).

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Defined benefit plans

The table below shows the reconciliation between the present value of defined benefit pension obligations assumed by the Bank with its employees at 31 December 2020 and 2019, the fair value of plan assets and the fair value of reimbursement rights that do not qualify as plan assets, in all cases within Spain, along with the amounts recognised on the consolidated balance sheet at those dates:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Present value of the obligations	905,197	1,002,147
Obligations covered by plan assets	422,158	190,148
Obligations covered by non-plan assets	483,039	811,999
Less - Fair value of plan assets	(434,929)	(193,404)
Recognised under "Provisions – Pensions and other post-employment defined benefit obligations" on the consolidated balance sheet	483,868	812,302
Recognised under "Other Assets – Other" on the consolidated balance sheet	(13,600)	(3,559)
Fair value of non-plan assets covering pension obligations	483,038	836,660

"Fair value of non-plan assets covering pension obligations" in the above table includes the fair value of insurance policies arranged with Bankia Mapfre Vida. The fair value of these insurance policies was calculated in accordance with the applicable provisions of section 16 of Rule Thirty-Five of Bank of Spain Circular 4/2017 and paragraph 115 of IAS 19; therefore, the present value of the insured pensions was considered fair value. The expected return on these policies was calculated using an interest rate of 0.55%, established in accordance with IAS 19 and the actuarial assumptions specified in prevailing legislation in Spain, as they are obligations with employees subject to Spanish labour law covered with funds set up in accordance with Royal Decree 1588/1999, of 15 October, as required by Rule Thirty-Five, point 14 c), of Circular 4/2017.

The fair value of plan assets stated in the above table is presented on the balance sheet as a reduction in the present value of the obligations assumed.

The present value of the obligations was determined by qualified actuaries using the following techniques:

- Calculation method: "projected unit credit method", which sees each period of service as giving rise to an additional unit of benefit entitlement and measures each unit separately.
- The estimated retirement age of each employee is the earliest at which the employee is entitled to retire.
- Actuarial assumptions used: unbiased and mutually compatible. Specifically, the most significant actuarial assumptions used in the calculation were as follows:

Actuarial assumptions	2020	2019
Technical interest rate (1)	0.55%	0.50%
Mortality tables	PERMF-2000	PERMF-2000
Estimated return on reimbursement rights recognised as assets	0.55%	0.50%
Expected return on plan assets	0.55%	0.50%
Social Security pensions growth rate (2)	Not applicable	1.00%
Rate of pension increase according to the Savings Banks collective agreement (3)	0.35%	1.00%
Rate of pension increase according to the CPI (3)	0.35%	1.75%
Cumulative CPI	1.75%	1.75%
Annual salary increase (4)	Not applicable	Not applicable

(1) Assumptions based on the duration of the post-employment obligations, which for this group is approximately 11.6 years, and in line with the yield on AA rated corporate bonds in the euro area.

(2) The assumption regarding the increase in Social Security pensions does not apply, since at the date of the actuarial measurement, 31 December 2020, there is no defined benefit obligation for serving employees or early-retired employees.

(3) With the official approval of pension growth in accordance with the Labour Agreement of 15 July 2020, the revaluation as of 1 January 2021 of all the commitments will be revised at a fixed rate of 0.35%.

(4) The assumption regarding the annual salary increase does not apply, since at the date of the actuarial measurement, 31 December 2020, no serving employee was covered by a defined benefit scheme.

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(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

The reconciliation of the balances recognised at 31 December 2020 and 2019 for the present value of the Bank's defined benefit obligations is as follows:

(in thousands of euros)		
ITEM	2020	2019
Balance at 1 January	1,002,147	939,337
Expected interest on the obligation	5,668	15,034
Gains and losses recognised immediately in equity ^(*) :	(29,344)	119,771
<i>a) (Gain)/loss arising from changes in financial assumptions</i>	<i>(5,179)</i>	<i>136,039</i>
<i>b) (Gain)/loss arising from other changes (data, experience, etc.)</i>	<i>(24,165)</i>	<i>(16,268)</i>
Benefits paid	(56,908)	(54,136)
Increase in obligation due to new commitments	100,580	1,875
Increase in obligation - Business combination	-	-
Curtailments	(116,946)	(19,734)
Balance at 31 December	905,197	1,002,147

(*) These amounts are recognised directly in "Accumulated other comprehensive income" in equity in the consolidated balance sheets (see Note 2.13).

The reconciliation of the fair value at 31 December 2020 and 2019 of plan assets in defined benefit obligations is as follows:

(in thousands of euros)		
ITEM	2020	2019
Fair value at 1 January	193,404	188,283
Expected interest on the Fund	1,885	2,992
Gains and losses recognised immediately in equity ^(*) :	(5,928)	14,907
<i>a) Expected return on plan assets, excluding interest on the Fund</i>	<i>(5,928)</i>	<i>14,907</i>
Net contributions/(reimbursements) ⁽¹⁾	(1,235)	(136)
Benefits paid	(17,275)	(12,642)
Increase in plan assets - Business combination	-	-
Reduction in plan assets - Reclassification of the value of the assets (transfer to linked insurance)	264,078	-
Fair value at 31 December	434,929	193,404

(*) These amounts are recognised directly in "Accumulated other comprehensive income" in equity in the consolidated balance sheets (see Note 2.13).

(1) Contributions/(reimbursements) imply a change in the fair value of "Plan assets" and, therefore, do not have any impact on the income statement.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

The reconciliation of the fair value at 31 December 2020 and 2019 of reimbursement rights recognised on the consolidated balance sheet as assets under "Other assets - Insurance contracts linked to pensions" is as follows:

(in thousands of euros)		
ITEM	2020	2019
Fair value at 1 January	836,660	772,825
Expected interest on insurance contracts linked to pensions	3,923	12,402
Gains and losses recognised immediately in equity (*):	(36,268)	110,746
<i>a) Expected return on linked insurance, excluding interest on insurance contracts linked to pensions</i>	<i>(36,268)</i>	<i>110,746</i>
Net contributions/(reimbursements) ⁽¹⁾	(104,519)	(19,693)
Benefits paid	(39,632)	(41,495)
Pension Plan rebates (deduction of contributions to defined contribution plan)	(12,797)	-
Increase in reimbursement rights - Business combination	-	-
Increase in reimbursement rights - Reclassification of the value of the assets (transfer to linked insurance)	(164,329)	1,875
Settlements	-	-
Fair value at 31 December	483,038	836,660

(*) These amounts are recognised directly in "Accumulated other comprehensive income" in equity in the consolidated balance sheets (see Note 2.13).

⁽¹⁾ Contributions/(reimbursements) imply a change in the fair value of "Insurance contracts linked to pensions" and, therefore, do not have any impact on the income statement.

Details of the fair value of the main plan assets at 31 December 2020 and 2019 are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Insurance policies	206,699	11,143
Other assets (*)	228,230	182,261

(*) The fair value of plan assets classified as "Other assets", quantified at EUR 228 million, includes assets covered by employee pension plans or insured by insurance policies that do not fit into the categories set out in paragraph 142 of IAS 19.

The criteria used to determine the total expected return on plan assets are based on the duration of the post-employment obligations, which for this group is approximately 11.6 years (11.19 years for 2019), and in line with the yield on AA rated corporate bonds in the euro area.

(38.4) Early retirement and other long-term obligations

The table below shows the reconciliation between the present value of early retirement and other long-term obligations assumed by the Bank with its employees at 31 December 2020 and 2019, the fair value of plan assets and the fair value of reimbursement rights that do not qualify as plan assets, in all cases within Spain, along with the amounts recognised on the consolidated balance sheet at those dates:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Present value of the obligations	160,628	227,057
Obligations covered by plan assets	2	1,139
Obligations covered by non-plan assets	160,541	225,248
Internal fund	85	670
Less - Fair value of plan assets	(2)	(1,135)
Recognised under "Provisions – Pensions and other post-employment defined benefit obligations" on the consolidated balance sheet	160,626	225,922
Recognised under "Other Assets – Other" on the consolidated balance sheet	-	-
Fair value of assets covering early retirement and other long-term obligations	160,541	225,252

The present value of the obligations was determined by qualified actuaries using the following techniques:

- Calculation method: "projected unit credit method", which sees each period of service as giving rise to an additional unit of benefit entitlement and measures each unit separately.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

- The estimated retirement age of each employee is the earliest at which the employee is entitled to retire.
- Actuarial assumptions used: unbiased and mutually compatible. Specifically, the most significant actuarial assumptions used in the calculation were as follows:

Actuarial assumptions	2020	2019
Technical interest rate ⁽¹⁾	0.00%	0.00%
Mortality tables	PERMF-2000	PERMF-2000
Estimated return on reimbursement rights recognised as assets	0.00%	0.00%
Expected return on plan assets	0.00%	0.00%
Social Security costs growth rate	2.00%	2.00%
Rate of pension increase according to the Savings Banks collective agreement	Not applicable	1.00%
Cumulative CPI	1.75%	1.75%
Annual salary increase	Not applicable	Not applicable
Medical cost trend rates	Not applicable	Not applicable

(1) Assumptions based on the duration of other long-term obligations, which for this group is approximately 1.77 years (2.09 years in 2019), and in line with the yield on AA rated corporate bonds in the euro area.

The reconciliation of the balances recognised at 31 December 2020 and 2019 for the present value of early retirement and other long-term obligations assumed by the Bank is as follows:

(in thousands of euros)

ITEM	2020	2019
Balance at 1 January	227,057	313,470
Expected interest on the obligation	-	968
Gains and losses recognised immediately:	6,773	(5,071)
<i>a) (Gain)/loss arising from changes in financial assumptions</i>	-	1,661
<i>b) (Gain)/loss arising from other changes (data, experience, etc.)</i>	6,773	(6,732)
Benefits paid	(73,208)	(82,310)
Increase in obligation due to new commitments	6	-
Additions due to business combination	-	-
Settlements	-	-
Balance at 31 December	160,628	227,057

The table below shows the reconciliation at 31 December 2020 and 2019 of the fair value of plan assets in early retirement obligations and similar defined benefit obligations:

(in thousands of euros)

ITEM	2020	2019
Fair value at 1 January	1,135	7,331
Expected interest on the Fund	-	16
Gains and losses recognised immediately	335	3,877
<i>a) Expected return on plan assets, excluding interest on the Fund</i>	335	3,877
Net contributions/(reimbursements)	(872)	(6,070)
Benefits paid	(596)	(4,019)
Fair value at 31 December	2	1,135

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

The table below shows the reconciliation at 31 December 2020 and 2019 of the fair value of reimbursement rights recognised as assets under "Other assets - Insurance contracts linked to pensions" on the consolidated balance sheet for early retirement and other long-term obligations (all corresponding to the Group's Spanish entities):

(in thousands of euros)		
ITEM	2020	2019
Fair value at 1 January	225,252	261,205
Expected interest on insurance contracts linked to pensions	-	811
Gains and losses recognised immediately	7,801	(138)
<i>a) Expected return on linked insurance, excluding interest on insurance contracts linked to pensions</i>	<i>7,801</i>	<i>(138)</i>
Net contributions/(reimbursements)	(1)	44,134
Benefits paid	(72,511)	(80,760)
Fair value at 31 December	160,541	225,252

The table below shows the fair value of the main plan assets at 31 December 2020 and 2019 for early retirement and similar obligations:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Insurance policies	2	1,135

(38.5) Estimate of future payments for defined benefit obligations

The following table shows the estimate of payments for defined benefit obligations over the next 10 years:

(in thousands of euros)						
FUTURE PAYMENTS	2021	2022	2023	2024	2025	2026-2030
Pension obligations	57,468	55,641	53,888	52,015	50,142	221,274
Other long-term obligations	69,787	57,857	30,086	2,823	73	-

The best actuarial estimate indicates that the amount of contributions to be made in respect of the pension and similar obligations assumed by the Group in 2021 will not be significant with respect to the consolidated profit and equity estimated for the Group at the end of the year.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(38.6) Sensitivity analysis

The table below shows an analysis of the sensitivity of defined benefit obligations at 31 December 2020, specifically pension and other long-term obligations (early retirement), to changes in the main actuarial assumptions:

(in thousands of euros)		
	Pension obligations	Early retirement
Technical interest rate		
50bp increase	856,065	159,602
50bp decrease (*)	959,439	160,628
Annual salary increase (**)		
50bp increase	Not applicable	Not applicable
50bp decrease	Not applicable	Not applicable
Annual pension increase (***)		
50bp increase	Not applicable	Not applicable
50bp decrease	Not applicable	Not applicable
Cumulative CPI		
50bp increase	905,241	Not applicable
50bp decrease	905,157	Not applicable

(*) As the interest rate for early-retired employees was 0.00%, the measurement with the 0.5% decrease was performed at 0%.

(**) The annual salary increase only affects serving employees. As there were no serving employees covered by defined benefit schemes at 31 December 2019, this change is not applicable.

(***) The annual pension increase is constant at 0.35% following the Labour Agreement of 15 July 2020.

Given the assurance of these obligations (see Note 2.13.1.2) the change in actuarial assumptions would not have a significant impact on these consolidated financial statements.

An estimate has been made of the rise in the Bank's post-employment and long-term obligations in the event of applying the mortality tables published by the Directorate-General for Insurance and Pension Funds on 28 December 2020. Should the first-order PER2020 mortality tables be used for groups, the rise in defined benefit obligations would increase by a maximum of 2.91%. Despite this increase, there is no impact on the Group's equity as the commitments are assured.

(38.7) Remuneration in kind

The Group's remuneration policy includes certain remuneration in kind, mainly financial assistance and health insurance policies, which are taxed, as appropriate, in accordance with prevailing regulations.

(38.8) Share-based payment schemes

The remuneration policy adheres to corporate governance best practices and is in accordance with European regulations concerning remuneration policies at credit institutions and Royal Decree-Law 2/2012 of 3 February, Ministerial Order ECC/1762/2012 of 3 August and Law 10/2014 of 26 June.

The system sets out a specific scheme for settling variable remuneration for executives who perform control functions or whose activity has a significant impact on the risk profile:

Management Committee:

- At least 50% of variable remuneration must be paid in Bankia shares.
- 100% of variable remuneration, whether in shares or cash, must be deferred.

Rest of the identified personnel:

- At least 50% of variable remuneration must be paid in Bankia shares.
- At least 40% of variable remuneration, whether in shares or cash, must be deferred over a period of three years.

Accordingly, for members of the Management Committee, 25% of the annual variable remuneration shall be settled in shares once three years have elapsed from the assessment of targets, with deferral of a further 25% to be settled in shares in two equal deliveries in the two subsequent years.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

For the rest of the identified personnel, 30% of annual variable remuneration shall be paid in shares following assessment of targets for the year. In addition, 20% of annual variable remuneration shall be deferred in three equal portions over a period of three years.

The share price shall be the average quoted price in the three months prior to the accrual date.

All shares delivered to directors as part of their annual variable remuneration shall be unavailable during the year immediately following the date on which they are delivered.

(39) Administrative expenses - Other administrative expenses

Details, by nature, of this item in the accompanying consolidated income statement for the years ended 31 December 2020 and 2019 are as follows:

(in thousands of euros)		
ITEM	(Expenses)	
	31/12/2020	31/12/2019
From property, fixtures and supplies ⁽¹⁾	(56,272)	(59,292)
IT and communications	(219,368)	(207,166)
Advertising and sponsorship	(47,895)	(54,375)
Technical reports	(36,517)	(36,662)
Surveillance and security carriage services	(16,775)	(18,122)
Contributions and taxes	(29,485)	(32,243)
Insurance and self-insurance premiums	(3,451)	(3,603)
Other expenses	(105,660)	(84,845)
Total	(515,423)	(496,308)

On 27 March 2020 the Bank's General Meeting of Shareholders appointed KPMG Auditores, S.L. as the auditor of Bankia, S.A. and its Group for 2020, 2021 and 2022, replacing Ernst & Young, S.L.

Fees corresponding to services rendered by the audit firm KPMG Auditores, S.L. for the audit of the financial statements of the Group for the year ended 31 December 2020, are as follows:

(in thousands of euros)	
ITEM	2020
Bankia, S.A.	
Audit services	2,304
Other assurance services	65
Other services	11
Subsidiaries	
Audit services	225
Total	2,605

The amounts detailed in the above table for audit services include the total fees for those services, irrespective of the date of invoice.

Other assurance services and other services reflect services provided in relation to the issue of comfort letters and translations, respectively.

In addition, at 31 December 2020 agreed fees, still to be invoiced, between the various companies of the Bankia Group and KPMG Auditores, S.L. amount to EUR 271 thousand and correspond mainly to regulatory work, agreed-upon procedures reports and translations.

Other entities affiliated with KPMG International have invoiced the Group the following fees and expenses for professional services during the year ended 31 December 2020:

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(in thousands of euros)	
ITEM	2020
Audit services	-
Other assurance services	-
Tax advisory services	4
Other services	320
Total	324

Furthermore, at 31 December 2020 agreed fees, still to be invoiced, between the various companies of the Bankia Group and other entities affiliated with KPMG International, amount to EUR 288 thousand.

Meanwhile, in 2020, eleven Bankia Group companies paid audit fees to firms other than the Parent's auditor amounting to EUR 147 thousand and EUR 102 thousand for other items.

Details of the fees for 2019 agreed by the various Bankia Group companies with firms belonging to the worldwide organisation of Ernst & Young, S.L. (the auditor of Bankia, S.A. and the Bankia Group until 2019) are as follows:

- For the audit of the financial statements of Bankia, S.A. and of the condensed consolidated interim financial statements and consolidated financial statements of the Bankia Group for 2019: EUR 1,804 thousand.
- For the audit and review of the financial statements of companies in the Bankia Group, in all cases for 2019: EUR 210 thousand.
- For other assurance and services similar to auditing required by regulations or supervisory authorities in 2019: EUR 135 thousand.
- For other professional services rendered in 2019: EUR 392 thousand, with no fees agreed for tax advisory services.

The services engaged by the Bankia Group meet the independence requirements stipulated in Audit Law 22/2015, of 20 July, and do not include any work that is incompatible with the audit function.

(40) Depreciation and amortisation

Details, by nature, of the amount recognised for this item in the consolidated income statement for the years ended 31 December 2020 and 2019 are as follows:

(in thousands of euros)		
ITEM	(Expenses)	
	31/12/2020	31/12/2019
Depreciation of tangible assets (Note 15)	(146,189)	(146,371)
Amortisation of intangible assets (Note 16.2)	(49,183)	(54,581)
Total	(195,372)	(200,952)

(41) Provisions or reversal of provisions

Details, by nature, of the amount recognised for this item in the consolidated income statement for the years ended 31 December 2020 and 2019 are as follows (see Note 20):

(in thousands of euros)		
ITEM	(Expenses) / Income	
	31/12/2020	31/12/2019
Pensions and other post-employment defined benefit obligations	104,711	28,653
Pending procedural issues and tax litigation	(96,293)	(104,233)
Commitments and guarantees given	25,947	72,047
Other provisions	(9,934)	(11,019)
Total	24,431	(14,552)

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(42) Impairment or reversal of impairment on financial assets not measured at fair value through profit or loss

Details of the net amount recognised for this item in the consolidated income statement for the years ended 31 December 2020 and 2019, by category of financial instrument, are as follows:

(in thousands of euros)		
ITEM	(Expenses) / Income	
	31/12/2020	31/12/2019
Financial assets at amortised cost (Note 12)	(1,043,594)	(463,493)
Financial assets at fair value through other comprehensive income (Note 11)	(198)	552
Total	(1,043,792)	(462,941)

(43) Impairment or reversal of impairment of non-financial assets and investments in joint ventures and associates

Details, by nature, of the amount recognised for these items in the accompanying consolidated income statement for the years ended 31 December 2020 and 2019 are as follows:

(in thousands of euros)		
ITEM	(Expenses) / Income	
	31/12/2020	31/12/2019
Impairment losses (net) on goodwill and other intangible assets	(5,894)	(5,700)
Impairment losses (net) on investment property	(15,786)	(14,566)
Impairment losses (net) on property, plant and equipment for own use	-	22
Impairment losses (net) on inventories	-	-
Impairment losses (net) on investments in joint ventures and associates	(97)	928
Total	(21,777)	(19,316)

(44) Gains or losses on derecognition of non-financial assets and investments, net

Details, by nature, of the amount recognised for this item in the accompanying consolidated income statement for the years ended 31 December 2020 and 2019 are as follows:

(in thousands of euros)		
ITEM	(Expenses) / Income	
	31/12/2020	31/12/2019
Gain/(loss) on disposal of tangible assets	504	3,088
Gain/(loss) on disposal of investment property	1,452	962
Gain/(loss) on disposal of investments	346	364
Other items	-	-
Total	2,302	4,414

(45) Profit or loss from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations

Details, by nature, of the amount recognised for this item in the accompanying consolidated income statement for the years ended 31 December 2020 and 2019 are as follows:

(in thousands of euros)		
ITEM	(Expenses) / Income	
	31/12/2020	31/12/2019
Non-current assets - Investment property	(116,007)	(199,328)
Non-current assets - Investments in joint ventures and associates	50,674	19,063
Non-current assets - Other income and expenses	107,809	-
Total	42,476	(180,265)

At 31 December 2020 "Non-current assets – Investment property" include impairment losses on assets amounting to EUR 138,861 thousand (EUR 200,610 thousand at 31 December 2019).

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

At 31 December 2020 “Non-current assets - Investments in joint ventures and associates” include the profit of EUR 51 million generated on the sale of the Caser investment (see Note 1.15).

At 31 December 2020 “Non-current assets - Other income and expenses” mainly include the profit of EUR 155 million generated on the sale of its collective investment undertaking and pension fund custodian business to Cecabank (see Note 27.3).

(46) Related parties

In addition to the disclosures made in Note 6 regarding the remuneration earned by members of the Board of Directors and Senior Executives of the Group, a breakdown of the balances recognised on the consolidated balance sheet at 31 December 2020 and the gains and losses recognised in the consolidated income statement for the year ended 31 December 2020 arising from transactions with related parties is as follows

(in thousands of euros)

ITEM	Significant shareholders	Directors and executives	Group employees, companies or entities	Other related parties	Total
EXPENSES AND INCOME					
(Interest expenses)	2	-	1,432	105	1,539
Leases	-	-	-	-	-
Services received	-	-	-	-	-
Purchases of goods (finished goods or work in progress)	-	-	-	-	-
Other expenses	-	(11)	4,827	(1)	4,815
Total	2	(11)	6,259	104	6,354
Interest income	238	5	1,996	55	2,294
Dividends received	-	-	-	853	853
Services rendered	1,565	115	339	162	2,181
Sales of inventories	-	-	-	-	-
Other income	-	-	-	-	-
Total	1,803	120	2,335	1,070	5,328

(in thousands of euros)

ITEM	Significant shareholders	Directors and executives	Group employees, companies or entities	Other related parties	Total
OTHER TRANSACTIONS					
Financing agreements: loans and capital contributions (lender)	(185)	(839)	44,905	(3,018)	40,863
Financing agreements: loans and capital contributions (borrower)	3,488	(452)	(110,857)	(16,023)	(123,844)
Collateral and bank guarantees given	(966)	-	(20)	(844)	(1,830)
Collateral and bank guarantees received	-	-	-	-	-
Commitments undertaken	-	7	2,724	164	2,895
Dividends and other profit distributed	(219,625)	-	-	-	(219,625)
Other transactions	(1,420)	-	-	-	(1,420)

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(in thousands of euros)

ITEM	Significant shareholders	Directors and executives	Group employees, companies or entities	Other related parties	Total
CLOSING BALANCES					
Trade receivables	-	-	-	-	-
Loans and credit extended	379	3,499	156,560	2,261	162,699
Other rights to receivables	-	-	-	-	-
Total receivables	379	3,499	156,560	2,261	162,699
Suppliers and trade payables	-	-	-	-	-
Loans and credit received	28,466	7,012	128,078	86,006	249,562
Other payment obligations	-	-	-	-	-
Total payables	28,466	7,012	128,078	86,006	249,562

Details of balances recognised on the Group's consolidated balance sheet at 31 December 2019 and amounts recognised in the consolidated income statement for the year then ended arising from transactions with related parties are as follows:

(in thousands of euros)

ITEM	Significant shareholders	Directors and executives	Group employees, companies or entities	Other related parties	Total
EXPENSES AND INCOME					
(Interest expenses)	59	-	4,500	185	4,744
Leases	-	-	-	-	-
Services received	-	-	-	-	-
Purchases of goods (finished goods or work in progress)	-	-	-	-	-
Other expenses	-	-	(62,638)	45	(62,593)
Total	59	-	(58,138)	230	(57,849)
Interest income	2	7	1,727	100	1,836
Dividends received	-	-	-	5,882	5,882
Services rendered	3,790	117	1,118	477	5,502
Sales of inventories	-	-	-	-	-
Other income	-	-	-	-	-
Total	3,792	124	2,845	6,459	13,220

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(in thousands of euros)

ITEM	Significant shareholders	Directors and executives	Group employees, companies or entities	Other related parties	Total
OTHER TRANSACTIONS					
Financing agreements: loans and capital contributions (lender)	(100,231)	3,416	(97,866)	3,577	(191,104)
Financing agreements: loans and capital contributions (borrower)	(10,723)	4,296	(220,010)	11,347	(215,090)
Collateral and bank guarantees given	(264)	(9)	(10,426)	(1,477)	(12,176)
Collateral and bank guarantees received	-	-	-	-	-
Commitments undertaken	-	36	(1,343)	67	(1,240)
Dividends and other profit distributed	(219,360)	-	-	-	(219,360)
Other transactions	728	-	-	-	728

(in thousands of euros)

ITEM	Significant shareholders	Directors and executives	Group employees, companies or entities	Other related parties	Total
CLOSING BALANCES					
Trade receivables	-	-	-	-	-
Loans and credit extended	564	4,338	111,655	5,279	121,836
Other rights to receivables	-	-	-	-	-
Total receivables	564	4,338	111,655	5,279	121,836
Suppliers and trade payables	-	-	-	-	-
Loans and credit received	24,978	7,464	238,935	96,639	368,016
Other payment obligations	-	-	-	-	-
Total payables	24,978	7,464	238,935	96,639	368,016

Details of associates and joint ventures are provided in Appendices III and IV hereto. "Other related parties" include balances held by close relatives of members of the Bank's Board of Directors (inter alia, directors' spouses and their own and their spouses' ascendants, descendants and siblings), by entities related to such persons, and by the Employee Pension Fund, as far as the Bank is aware.

All transactions between the Group and its related parties were at arm's length.

In addition, at 31 December 2020, the Fund for Orderly Bank Restructuring (FROB), through BFA, held a 61.83% (62.48% taking into consideration the effect of treasury shares) stake in Bankia, S.A. The FROB carries out its activity in accordance with Law 9/2012 of 14 November 2012. It is wholly owned by the Spanish government and its purpose is to oversee the restructuring and resolution of credit institutions. Given the indirect stake held by the FROB in Bankia, S.A., the Spanish government is a related party under prevailing regulations.

Balances with general government at 31 December 2020 are disclosed in the following notes to the financial statements:

- Note 9 Financial assets and liabilities held for trading.
- Note 10 Non-trading financial assets mandatorily at fair value through profit or loss.
- Note 11 Financial assets at fair value through other comprehensive income.
- Note 12 Financial assets at amortised cost – Loans and advances – Customers.
- Note 19 Financial liabilities at amortised cost – Deposits – Customers.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

The income and expenses recognised in the consolidated income statement for 2020 and 2019 are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Interest income Spanish general government ^(*)	41,243	47,368
Interest expenses Spanish general government ^(*)	(156)	(1,999)

(*) Interest income and interest expenses are shown at their gross amounts.

There were no significant individual transactions with general government outside the ordinary course of the Group's business.

Transactions carried out, balances held and contracts entered into with BFA

The main balances held by the Bank with BFA (significant shareholder) at 31 December 2020 include the following:

- "Loans and credit received" include an interest-bearing demand deposit of EUR 28 million, set up by BFA;
- "Other rights to receivables" reflect the balance related to the accrual of fees and commissions explained below;
- "Collateral and bank guarantees given" reflect the amounts drawn on the line of bank guarantees granted by Bankia to BFA;
- "Services rendered" in the income statement include income from services rendered by the Bank to recover fully impaired and written-off BFA assets, calculated in accordance with the total amount recovered, and from bank guarantees issued;
- Lastly, the table above showing related-party figures includes interest income received and interest expenses paid, respectively, in connection with the loan and deposit transactions mentioned under the above headings.

Bankia and BFA have also entered into the following contracts and agreements:

- A Framework Agreement governing relations between the two institutions.
- A Service Level Agreement that enables BFA to correctly perform its activity by using Bankia's human and material resources, while avoiding any duplications.
- A Master Financial Transactions Agreement (MFTA) on derivatives trading between the two institutions.
- A Global Master Repurchase Agreement (GMRA) and a Collateral Assignment Agreement linked to fixed-income repo transactions.
- A European Master Financial Transactions Agreement (EMFTA) covering securities lending and fixed-income repo agreements.
- A cost-sharing agreement for lawsuits related to preference shares and subordinated bonds.
- An agreement establishing an access mechanism allowing BFA, through the Bank, to avail of the liquidity and funding mechanisms set up by the European Central Bank for credit institutions, as well as private deals inherent in the business of credit institutions.
- An agreement to apportion the cost of civil proceedings and claims filed in relation to Bankia's IPO.
- BFA/Bankia cooperation protocol. Article 11.2 CRR, designed to regulate relations between BFA and Bankia with respect to defining and implementing the necessary mechanisms and procedures to comply with the obligations imposed by article 11.2 of Regulation (EU) No 575/2013 and, in particular, to verify that BFA complies with the capital requirements imposed by applicable legislation.
- An agreement for managing the FROB's indirect (through BFA) stake in Bankia.

All transactions between the two entities are carried out on normal market terms.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

APPENDICES

Appendix I – Individual Financial Statements

BANKIA, S.A.		
Balance sheets at 31 December 2020 and 2019		
(in thousands of euros)		
ASSETS	31/12/2020	31/12/2019 (*)
Cash, cash balances at central banks and other demand deposits	11,409,212	12,826,591
Financial assets held for trading	6,778,561	6,702,504
Derivatives	6,697,324	6,530,330
Equity instruments	683	1,381
Debt securities	80,554	170,793
Loans and advances	-	-
Central banks	-	-
Credit institutions	-	-
Customers	-	-
Memorandum item: loaned or advanced as collateral with the right to sell or pledge	5,316	67,682
Non-trading financial assets mandatorily at fair value through profit or loss	11,002	34,435
Equity instruments	-	-
Debt securities	192	237
Loans and advances	10,810	34,198
Central banks	-	-
Credit institutions	-	23,263
Customers	10,810	10,935
Memorandum item: loaned or advanced as collateral with the right to sell or pledge	-	-
Financial assets designated at fair value through profit or loss	-	-
Debt securities	-	-
Loans and advances	-	-
Central banks	-	-
Credit institutions	-	-
Customers	-	-
Memorandum item: loaned or advanced as collateral with the right to sell or pledge	-	-
Financial assets at fair value through other comprehensive income	8,621,927	11,979,857
Equity instruments	58,794	75,816
Debt securities	8,563,133	11,904,041
Loans and advances	-	-
Central banks	-	-
Credit institutions	-	-
Customers	-	-
Memorandum item: loaned or advanced as collateral with the right to sell or pledge	1,866,342	7,568,250
Financial assets at amortised cost	163,498,259	156,179,198
Debt securities	37,495,041	33,165,031
Loans and advances	126,003,218	123,014,167
Central banks	-	-
Credit institutions	4,913,133	5,464,732
Customers	121,090,085	117,549,435
Memorandum item: loaned or advanced as collateral with the right to sell or pledge	19,099,741	25,284,204
Derivatives - Hedge accounting	2,446,875	2,491,810
Fair value changes of the hedged items in portfolio hedge of interest rate risk	-	-
Investments in subsidiaries, joint ventures and associates	1,775,852	1,772,674
Subsidiaries	1,312,324	1,322,649
Joint ventures	18,921	9,034
Associates	444,607	440,991
Tangible assets	2,497,329	2,597,428
Property, plant and equipment	2,038,165	2,122,925
For own use	2,038,165	2,122,925
Leased out under an operating lease	-	-
Assigned to welfare projects (savings banks and credit cooperatives)	-	-
Investment property	459,164	474,503
Of which: leased out under an operating lease	459,164	474,503
Memorandum item: acquired under a lease	484,320	504,863
Intangible assets	417,612	312,047
Goodwill	-	-
Other intangible assets	417,612	312,047
Tax assets	10,077,950	10,214,679
Current tax assets	253,584	431,863
Deferred tax assets	9,824,366	9,782,816
Other assets	960,577	1,721,479
Insurance contracts linked to pensions	643,579	1,061,912
Inventories	-	-
Other	316,998	659,567
Non-current assets and disposal groups classified as held for sale	1,627,965	2,047,280
TOTAL ASSETS	210,123,121	208,879,982

(*) The balance sheet at 31 December 2019 is presented solely and exclusively for comparison purposes (see note 1.5).

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

BANKIA, S.A.		
Balance sheets at 31 December 2020 and 2019		
(in thousands of euros)		
LIABILITIES AND EQUITY	31/12/2020	31/12/2019 (*)
Financial liabilities held for trading	6,880,046	6,783,073
Derivatives	6,690,843	6,511,840
Short positions	189,203	271,233
Deposits	-	-
Central banks	-	-
Credit institutions	-	-
Customers	-	-
Debt securities issued	-	-
Other financial liabilities	-	-
Financial liabilities designated at fair value through profit or loss	-	-
Deposits	-	-
Central banks	-	-
Credit institutions	-	-
Customers	-	-
Debt securities issued	-	-
Other financial liabilities	-	-
Memorandum item: subordinated liabilities	-	-
Financial liabilities at amortised cost	187,879,746	186,159,113
Deposits	168,030,963	167,385,330
Central banks	22,899,831	13,808,756
Credit institutions	14,831,151	26,447,898
Customers	130,299,981	127,128,676
Debt securities issued	17,379,755	17,302,153
Other financial liabilities	2,469,028	1,471,630
Memorandum item: subordinated liabilities	2,975,097	2,983,031
Derivatives - Hedge accounting	151,220	85,541
Fair value changes of the hedged items in portfolio hedge of interest rate risk	-	-
Provisions	1,228,157	1,685,484
Pensions and other post-employment defined benefit obligations	644,494	1,038,224
Other long-term employee benefits	-	-
Pending procedural issues and tax litigation	183,500	210,614
Commitments and guarantees given	275,143	301,731
Other provisions	125,020	134,915
Tax liabilities	404,030	452,531
Current tax liabilities	-	-
Deferred tax liabilities	404,030	452,531
Share capital repayable on demand	-	-
Other liabilities	956,401	885,606
Of which: welfare fund (only savings banks and credit cooperatives)	-	-
Liabilities included in disposal groups classified as held for sale	-	-
TOTAL LIABILITIES	197,499,600	196,051,348
Own funds	12,513,141	12,701,647
Capital	3,069,522	3,069,522
Paid up capital	3,069,522	3,069,522
Unpaid capital which has been called up	-	-
Memorandum item: uncalled capital	-	-
Share premium	619,154	619,154
Equity instruments issued other than capital	-	-
Equity component of compound financial instruments	-	-
Other equity instruments issued	-	-
Other equity	-	-
Retained earnings	-	-
Revaluation reserves	-	-
Other reserves	8,623,375	8,500,365
(-) Treasury shares	(49,475)	(50,343)
Profit or (-) loss for the year	250,565	562,949
(-) Interim dividends	-	-
Accumulated other comprehensive income	110,380	126,987
Items that will not be reclassified to profit or loss	28,127	52,907
Actuarial gains or (-) losses on defined benefit pension plans	25,060	34,056
Non-current assets and disposal groups classified as held for sale	(18,701)	(9,453)
Fair value changes of equity instruments measured at fair value through other comprehensive income	21,768	28,304
Hedge ineffectiveness of fair value hedges for equity instruments measured at fair value through other comprehensive income	-	-
Fair value changes of equity instruments measured at fair value through other comprehensive income [hedged item]	-	-
Fair value changes of equity instruments measured at fair value through other comprehensive income [hedging]	-	-
Fair value changes of financial liabilities at fair value through profit or loss attributable to changes in their credit risk	-	-
Items that may be reclassified to profit or loss	82,253	74,080
Hedge of net investments in foreign operations [effective portion]	-	-
Foreign currency translation	(458)	(113)
Hedging derivatives, Cash flow hedges [effective portion]	(3,063)	(8,006)
Fair value changes of debt instruments measured at fair value through other comprehensive income	85,774	82,199
Hedging instruments [not designated elements]	-	-
Non-current assets and disposal groups classified as held for sale	-	-
TOTAL EQUITY	12,623,521	12,828,634
TOTAL LIABILITIES AND EQUITY	210,123,121	208,879,982
MEMORANDUM ITEM: OFF-BALANCE SHEET EXPOSURES	43,325,528	36,883,441
Loan commitments given	28,716,063	23,394,354
Financial guarantees given	341,602	376,728
Other commitments given	14,267,863	13,112,359

(*) The balance sheet at 31 December 2019 is presented solely and exclusively for comparison purposes. See Note 1.5.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

BANKIA, S.A.**Income statements for the years ended 31 December 2020 and 2019**

(in thousands of euros)

	2020	2019 (*)
Interest income	2,299,287	2,457,957
Financial assets at fair value through other comprehensive income	81,197	143,279
Financial assets at amortised cost	2,012,715	2,187,680
Other interest income	205,375	126,998
(Interest expenses)	(406,570)	(468,641)
(Expenses on share capital repayable on demand)	-	-
A) NET INTEREST INCOME	1,892,717	1,989,316
Dividend income	80,518	234,890
Fee and commission income	1,165,520	1,058,368
(Fee and commission expenses)	(66,795)	(82,539)
Gains or (-) losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss, net	154,568	288,776
Financial assets at amortised cost	127,968	71,247
Other financial assets and liabilities	26,600	217,529
Gains or (-) losses on financial assets and liabilities held for trading, net	22,034	26,466
Reclassification of financial assets out of measured at fair value through other comprehensive income	-	-
Reclassification of financial assets out of measured at amortised cost	-	-
Other gains or (-) losses	22,034	26,466
	(513)	905
Gains or (-) losses on non-trading financial assets mandatorily at fair value through profit or loss, net	-	-
Reclassification of financial assets out of measured at fair value through other comprehensive income	-	-
Reclassification of financial assets out of measured at amortised cost	-	-
Other gains or (-) losses	(513)	905
Gains or (-) losses on financial assets and liabilities designated at fair value through profit or loss, net	-	-
Gains or (-) losses from hedge accounting, net	(22,788)	(11,531)
Exchange differences [gain or (-) loss], net	13,228	15,455
Other operating income	62,682	55,302
(Other operating expenses)	(306,459)	(303,033)
<i>Of which: mandatory contributions to welfare funds (only savings banks and credit cooperatives)</i>	-	-
B) GROSS INCOME	2,994,712	3,272,375
(Administrative expenses)	(1,565,166)	(1,596,289)
(Staff expenses)	(1,051,277)	(1,100,444)
(Other administrative expenses)	(513,889)	(495,845)
(Depreciation and amortisation)	(194,330)	(199,677)
(Provisions or (-) reversal of provisions)	15,602	(21,658)
(Impairment or (-) reversal of impairment on financial assets not measured at fair value through profit or loss and modification losses or (-) gains, net)	(1,043,792)	(457,260)
(Financial assets at fair value through other comprehensive income)	(198)	552
(Financial assets at amortised cost)	(1,043,594)	(457,812)
C) RESULTS FROM OPERATING ACTIVITIES	207,026	997,491
(Impairment or (-) reversal of impairment of investments in subsidiaries, joint ventures and associates)	(5,638)	(95,276)
(Impairment or (-) reversal of impairment on non-financial assets)	(15,709)	(14,022)
(Tangible assets)	(15,709)	(14,022)
(Intangible assets)	-	-
(Other)	-	-
Gains or (-) losses on derecognition of non-financial assets, net	1,917	(329)
Negative goodwill recognised in profit or loss	-	-
Profit or (-) loss from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations	108,960	(117,552)
D) PROFIT OR (-) LOSS BEFORE TAX FROM CONTINUING OPERATIONS	296,556	770,312
(Tax expense or (-) income related to profit or loss from continuing operations)	(45,991)	(207,363)
E) PROFIT OR (-) LOSS AFTER TAX FROM CONTINUING OPERATIONS	250,565	562,949
Profit or (-) loss after tax from discontinued operations	-	-
F) PROFIT OR (-) LOSS FOR THE YEAR	250,565	562,949

(*) The income statement for 2019 is presented solely and exclusively for comparison purposes. See Note 1.5.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

BANKIA, S.A.

Statements of recognised income and expense for the years ended 31 December 2020 and 2019

(in thousands of euros)

	2020	2019 (*)
Profit or (-) loss for the year	250,565	562,949
Other comprehensive income	(16,607)	13,776
Items that will not be reclassified to profit or loss	(24,780)	1,223
Actuarial gains or (-) losses on defined benefit pension plans	(12,851)	5,881
Non-current assets and disposal groups held for sale	(13,211)	(13,504)
	(9,337)	9,370
Fair value changes of equity instruments measured at fair value through other comprehensive income		
Gains or (-) losses from hedge accounting of equity instruments at fair value through other comprehensive income, net	-	-
Fair value changes of equity instruments measured at fair value through other comprehensive income [hedged item]	-	-
Fair value changes of equity instruments measured at fair value through other comprehensive income [hedging instrument]	-	-
Fair value changes of financial liabilities at fair value through profit or loss attributable to changes in their credit risk	-	-
Income tax relating to items that will not be reclassified	10,619	(524)
Items that may be reclassified to profit or loss	8,173	12,553
Hedge of net investments in foreign operations [effective portion]	-	-
Valuation gains or (-) losses taken to equity	-	-
Transferred to profit or loss	-	-
Other reclassifications	-	-
Foreign currency translation	(493)	256
Translation gains or (-) losses taken to equity	(493)	256
Transferred to profit or loss	-	-
Other reclassifications	-	-
Cash flow hedges [effective portion]	7,062	(8,153)
Valuation gains or (-) losses taken to equity	7,062	(8,153)
Transferred to profit or loss	-	-
Transferred to initial carrying amount of hedged items	-	-
Other reclassifications	-	-
Hedging instruments [not designated elements]	-	-
Valuation gains or (-) losses taken to equity	-	-
Transferred to profit or loss	-	-
Other reclassifications	-	-
Debt instruments at fair value through other comprehensive income	5,107	28,064
Valuation gains or (-) losses taken to equity	25,729	241,234
Transferred to profit or loss	(20,622)	(213,170)
Other reclassifications	-	-
Non-current assets and disposal groups held for sale	-	(2,234)
Valuation gains or (-) losses taken to equity	-	(2,234)
Transferred to profit or loss	-	-
Other reclassifications	-	-
Income tax relating to items that may be reclassified to profit or (-) loss	(3,503)	(5,380)
Total comprehensive income for the year	233,958	576,725

(*) The statement of recognised income and expense for 2019 is presented solely and exclusively for comparison purposes. See Note 1.5.

BANKIA FINANCIAL STATEMENTS 2020 BANKIA GROUP

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

BANKIA, S.A.
Statement of total changes in equity for the year ended 31 December 2020

(in thousands of euros)

Sources of equity changes	Capital	Share premium	Equity instruments issued other than capital	Other equity	Retained earnings	Revaluation reserves	Other reserves	(-) Treasury shares	Profit or (-) loss for the year	(-) Interim dividends	Accumulated other comprehensive income	Total
Opening balance at 31/12/2019 [before restatement]	3,069,522	619,154	-	-	-	-	8,500,365	(50,343)	562,949	-	126,987	12,828,634
Effects of corrections of errors	-	-	-	-	-	-	-	-	-	-	-	-
Effects of changes in accounting policies	-	-	-	-	-	-	-	-	-	-	-	-
Opening balance [current period]	3,069,522	619,154	-	-	-	-	8,500,365	(50,343)	562,949	-	126,987	12,828,634
Total comprehensive income for the year									250,565		(16,607)	233,958
Other changes in equity	-	-	-	-	-	-	123,010	868	(562,949)	-	-	(439,071)
Issuance of ordinary shares	-	-	-	-	-	-	-	-	-	-	-	-
Issuance of preference shares	-	-	-	-	-	-	-	-	-	-	-	-
Issuance of other equity instruments	-	-	-	-	-	-	-	-	-	-	-	-
Exercise or expiration of other equity instruments issued	-	-	-	-	-	-	-	-	-	-	-	-
Conversion of debt to equity	-	-	-	-	-	-	-	-	-	-	-	-
Capital reduction	-	-	-	-	-	-	-	-	-	-	-	-
Dividends	-	-	-	-	-	-	(352,110)	-	-	-	-	(352,110)
Purchase of treasury shares	-	-	-	-	-	-	-	(30,086)	-	-	-	(30,086)
Sale or cancellation of treasury shares	-	-	-	-	-	-	(12,519)	30,954	-	-	-	18,435
Reclassification of financial instruments from equity to liability	-	-	-	-	-	-	-	-	-	-	-	-
Reclassification of financial instruments from liability to equity	-	-	-	-	-	-	-	-	-	-	-	-
Transfers among components of equity	-	-	-	-	-	-	562,949	-	(562,949)	-	-	-
Equity increase or (-) decrease resulting from business combinations	-	-	-	-	-	-	-	-	-	-	-	-
Share based payments	-	-	-	-	-	-	-	-	-	-	-	-
Other increase or (-) decrease in equity	-	-	-	-	-	-	(75,310)	-	-	-	-	(75,310)
Of which: discretionary contributions to welfare funds (only savings banks and credit cooperatives)	-	-	-	-	-	-	-	-	-	-	-	-
Closing balance at 31/12/2020 [current period]	3,069,522	619,154	-	-	-	-	8,623,375	(49,475)	250,565	-	110,380	12,623,521

BANKIA FINANCIAL STATEMENTS 2020 BANKIA GROUP

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

BANKIA, S.A.
Statement of total changes in equity for the year ended 31 December 2019 (*)

(in thousands of euros)

Sources of equity changes	Capital	Share premium	Equity instruments issued other than capital	Other equity	Retained earnings	Revaluation reserves	Other reserves	(-) Treasury shares	Profit or (-) loss for the year	(-) Interim dividends	Accumulated other comprehensive income	Total
Opening balance at 31/12/2018 [before restatement]	3,084,963	619,154	-	-	-	-	7,980,060	(96,646)	833,668	-	113,211	12,534,410
Effects of corrections of errors	-	-	-	-	-	-	-	-	-	-	-	-
Effects of changes in accounting policies	-	-	-	-	-	-	-	-	-	-	-	-
Opening balance [current period]	3,084,963	619,154	-	-	-	-	7,980,060	(96,646)	833,668	-	113,211	12,534,410
Total comprehensive income for the year									562,949		13,776	576,725
Other changes in equity	(15,441)	-	-	-	-	-	520,305	46,303	(833,668)	-	-	(282,501)
Issuance of ordinary shares	-	-	-	-	-	-	-	-	-	-	-	-
Issuance of preference shares	-	-	-	-	-	-	-	-	-	-	-	-
Issuance of other equity instruments	-	-	-	-	-	-	-	-	-	-	-	-
Exercise or expiration of other equity instruments issued	-	-	-	-	-	-	-	-	-	-	-	-
Conversion of debt to equity	-	-	-	-	-	-	-	-	-	-	-	-
Capital reduction	(15,441)	-	-	-	-	-	(34,559)	50,000	-	-	-	-
Dividends	-	-	-	-	-	-	(353,515)	-	-	-	-	(353,515)
Purchase of treasury shares	-	-	-	-	-	-	-	(64,971)	-	-	-	(64,971)
Sale or cancellation of treasury shares	-	-	-	-	-	-	(12,143)	61,274	-	-	-	49,131
Reclassification of financial instruments from equity to liability	-	-	-	-	-	-	-	-	-	-	-	-
Reclassification of financial instruments from liability to equity	-	-	-	-	-	-	-	-	-	-	-	-
Transfers among components of equity	-	-	-	-	-	-	833,668	-	(833,668)	-	-	-
Equity increase or (-) decrease resulting from business combinations	-	-	-	-	-	-	-	-	-	-	-	-
Share based payments	-	-	-	-	-	-	-	-	-	-	-	-
Other increase or (-) decrease in equity	-	-	-	-	-	-	86,854	-	-	-	-	86,854
Of which: discretionary contributions to welfare funds (only savings banks and credit cooperatives)	-	-	-	-	-	-	-	-	-	-	-	-
Closing balance at 31/12/2019 [current period]	3,069,522	619,154	-	-	-	-	8,500,365	(50,343)	562,949	-	126,987	12,828,634

(*) Presented solely and exclusively for comparison purposes (see note 1.5).

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

BANKIA, S.A.		
Statements of cash flows for the years ended 31 December 2020 and 2019		
(in thousands of euros)		
	2020	2019 (*)
A) CASH FLOWS FROM (USED IN) OPERATING ACTIVITIES	(1,156,082)	7,161,341
Profit or (-) loss for the year	250,565	562,949
Adjustments to obtain cash flows from (used in) operating activities	1,011,698	808,001
Depreciation and amortisation	194,330	199,677
Other adjustments	817,368	608,324
Net increase/decrease in operating assets	(3,879,965)	4,695,113
Financial assets held for trading	90,937	113,296
Non-trading financial assets mandatorily at fair value through profit or loss	22,920	(24,182)
Financial assets designated at fair value through profit or loss	-	-
Financial assets at fair value through other comprehensive income	3,374,124	3,894,113
Financial assets at amortised cost	(7,965,451)	489,404
Other operating assets	597,505	222,482
Net increase/decrease in operating liabilities	1,409,246	952,528
Financial liabilities held for trading	(70,021)	209,080
Financial liabilities designated at fair value through profit or loss	-	-
Financial liabilities at amortised cost	1,757,607	1,051,106
Other operating liabilities	(278,340)	(307,658)
Income tax received/paid	52,374	142,750
B) CASH FLOWS FROM INVESTING ACTIVITIES	284,712	1,272,084
Payments	(223,046)	(260,838)
Tangible assets	(39,325)	(63,794)
Intangible assets	(154,227)	(160,383)
Investments in subsidiaries, joint ventures and associates	(18,211)	(9,438)
Other business units	-	-
Non-current assets and liabilities classified as held for sale	(11,283)	(27,223)
Other payments related to investing activities	-	-
Receipts	507,758	1,532,922
Tangible assets	38,123	38,838
Intangible assets	-	-
Investments in subsidiaries, joint ventures and associates	88,216	221,105
Other business units	-	-
Non-current assets and liabilities classified as held for sale	381,419	1,272,979
Other receipts related to investing activities	-	-
C) CASH FLOWS FROM (USED IN) FINANCING ACTIVITIES	(546,009)	38,776
Payments	(564,444)	(4,145,355)
Dividends	(352,110)	(353,515)
Subordinated liabilities	-	(1,006,860)
Redemption of own equity instruments	-	-
Acquisition of own equity instruments	(30,086)	(64,971)
Other payments related to financing activities	(182,248)	(2,720,009)
Receipts	18,435	4,184,131
Subordinated liabilities	-	1,000,000
Issuance of own equity instruments	-	-
Disposal of own equity instruments	18,435	49,131
Other receipts related to financing activities	-	3,135,000
D) EFFECT OF EXCHANGE RATE FLUCTUATIONS	-	-
E) NET INCREASE/(DECREASE) IN CASH AND CASH EQUIVALENTS (A+B+C+D)	(1,417,379)	8,472,201
F) CASH AND CASH EQUIVALENTS AT THE BEGINNING OF THE PERIOD	12,826,591	4,354,390
G) CASH AND CASH EQUIVALENTS AT THE END OF THE PERIOD	11,409,212	12,826,591
COMPONENTS OF CASH AND CASH EQUIVALENTS AT THE END OF THE PERIOD		
Cash	936,299	951,824
Cash equivalents at central banks	10,380,666	11,672,642
Other financial assets	92,247	202,125
Less: bank overdrafts repayable on demand	-	-

(*) The statement of cash flows for 2019 is presented solely and exclusively for comparison purposes. See Note 1.5.

BANKIA FINANCIAL STATEMENTS 2020 BANKIA GROUP

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Appendix II – Subsidiaries

The key details on subsidiaries, including those classified under "Non-current assets held for sale", at 31 December 2020 are as follows:

Company	Business activity	Registered office	% Ownership held by the Group		
			% Current ownership		Total ownership interest
			Direct	Indirect	
ARRENDADORA DE EQUIPAMIENTOS FERROVIARIOS, S.A.	Purchase and lease of trains	Barcelona – Spain	85.00	-	85.00
BANKIA COMMERCE, S.L.U.	Marketing of products	Madrid - Spain	100.00	-	100.00
BANKIA FINTECH VENTURE S.A.U.	Corporate management firm	Madrid - Spain	100.00	-	100.00
BANKIA FONDOS, S.G.I.I.C., S.A.	Collective investment undertakings manager	Madrid - Spain	100.00	-	100.00
BANKIA HABITAT, S.L.U.	Real estate	Valencia – Spain	100.00	-	100.00
BANKIA MEDIACIÓN, OPERADOR DE BANCA SEGUROS VINCULADO, S.A.U.	Insurance intermediary-Bancassurance operator	Madrid - Spain	100.00	-	100.00
BANKIA PENSIONES, S.A., ENTIDAD GESTORA DE FONDOS DE PENSIONES	Pension fund manager	Madrid - Spain	100.00	-	100.00
CENTRO DE SERVICIOS OPERATIVOS E INGENIERIA DE PROCESOS, S.L.U.	Other independent services	Madrid - Spain	100.00	-	100.00
CORPORACIÓN INDUSTRIAL BANKIA, S.A.U.	Corporate management firm	Madrid - Spain	100.00	-	100.00
COSTA EBORIS, S.L.U., IN LIQUIDATION (1)	Real estate	Valencia – Spain	-	100.00	100.00
ENCINA LOS MONTEROS, S.L.U., IN LIQUIDATION (1)	Real estate	Valencia – Spain	-	100.00	100.00
GESTIÓN Y REPRESENTACIÓN GLOBAL, S.L.U.	Corporate management firm	Madrid - Spain	100.00	-	100.00
GESTIÓN GLOBAL DE PARTICIPACIONES, S.L.U.	Corporate management firm	Madrid - Spain	100.00	-	100.00
GESTION Y RECAUDACION LOCAL, S.L. (2)	Tax management	Atarfe (Granada) - Spain	-	99.75	99.75
INMOGESTIÓN Y PATRIMONIOS, S.A.	Corporate management firm	Madrid - Spain	0.10	99.90	100.00
INVERSIONES Y DESARROLLOS 2069 MADRID, S.L.U., IN LIQUIDATION (1)	Real estate	Madrid - Spain	100.00	-	100.00
NAVIERA CATA, S.A.	Acquisition, leases and operation of ships	Las Palmas de Gran Canaria (Las Palmas) - Spain	100.00	-	100.00
PARTICIPACIONES Y CARTERA DE INVERSIÓN, S.L.	Corporate management firm	Madrid - Spain	0.01	99.99	100.00
PUERTAS DE LORCA DESARROLLOS EMPRESARIALES, S.L.U., IN LIQUIDATION (1)	Property development	Madrid - Spain	100.00	-	100.00
SEGUROBANKIA, S.A.U., CORREDURÍA DE SEGUROS DEL GRUPO BANKIA	Insurance intermediary	Madrid - Spain	100.00	-	100.00
VALENCIANA DE INVERSIONES MOBILIARIAS, S.L.U.	Corporate management firm	Valencia – Spain	100.00	-	100.00
VALORACIÓN Y CONTROL, S.L.	Corporate management firm	Madrid - Spain	0.01	99.99	100.00

(1) Companies in the process of liquidation

(2) Companies classified under "Non-current assets and disposal groups classified as held for sale".

BANKIA FINANCIAL STATEMENTS 2020 BANKIA GROUP

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Appendix III – Associates and joint ventures

The key details on associates and joint ventures at 31 December 2020 are as follows:

Company	Business activity	Registered office	% Ownership held by the Group			Thousands of euros (*)		
			% Current ownership		Total ownership interest	2020		
			Direct	Indirect		Assets (*)	Liabilities (*)	Profit/(loss) (*)
Associates								
AVALMADRID, S.G.R.	SME funding	Madrid - Spain	24.55	-	24.55	128,338	62,382	-
BANKIA MAPFRE VIDA, S.A., DE SEGUROS Y REASEGUROS	Life insurance	Majadahonda (Madrid) - Spain	49.00	-	49.00	8,100,628	7,660,589	128,742
BILLIB, S.L.	Other independent services	Madrid - Spain	-	31.81	31.81	7,100	664	(1,210)
FINWEG, S.A.	Other independent services	Madrid - Spain	-	20.00	20.00	1,242	337	(526)
GRAMINA HOMES, S.L.	Real estate	Madrid - Spain	20.00	-	20.00	625,154	24,656	(19,651)
REDSYS SERVICIOS DE PROCESAMIENTO, S.L.	Payment methods	Madrid - Spain	15.94	-	15.94	99,900	29,371	1,797
Joint ventures								
CACF BANKIA CONSUMER FINANCE, EFC, S.A.	Consumer finance	Madrid - Spain	49.00	-	49.00	159,524	120,911	(13,482)

(*) Latest available data, unaudited

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Appendix IV – Joint ventures and associates classified under "Non-current assets and disposal groups classified as held for sale"

The key details on joint ventures and associates classified under “Non-current assets and disposal groups classified as held for sale” at 31 December 2020 are as follows:

Company	Business activity	Registered office	% Ownership held by the Group			Thousands of euros (*)		
			% Current ownership		Total ownership interest	2020		
			Direct	Indirect		Assets (*)	Liabilities (*)	Profit/(loss) (*)
Associates								
ALAZOR INVERSIONES, S.A., IN LIQUIDATION (1)	Activities annexed to land transport	Villaviciosa de Odón (Madrid) - Spain	-	20.00	20.00	1,086,675	1,324,938	-
ARRENDADORA FERROVIARIA, S.A.	Purchase and lease of trains	Barcelona – Spain	29.07	-	29.07	203,158	203,711	6
MURCIA EMPRENDE, SOCIEDAD DE CAPITAL RIESGO DE REGIMEN SIMPLIFICADO, S.A.	Venture capital company	Murcia - Spain	28.68	-	28.68	2,435	35	(160)
NEWCOVAL, S.L.	Real estate	Valencia – Spain	-	50.00	50.00	739	653	-
ROYACTURA, S.L., IN LIQUIDATION (1)	Real estate	Las Rozas de Madrid (Madrid) - Spain	-	45.00	45.00	57,027	56,157	-
Joint ventures								
CARTERA PERSEIDAS, S.L., IN LIQUIDATION (1)	Corporate management firm	Madrid - Spain	11.82	-	11.82	148	7	(27)
INMACOR DESARROLLOS, S.A. DE CV, IN LIQUIDATION (1)	Real estate	Playa del Carmen (Quintana Roo) - Mexico	-	72.57	72.57	838	11	30
INMOBILIARIA PIEDRA BOLAS, S.A. DE CV, IN LIQUIDATION (1)	Real estate	Playa del Carmen (Quintana Roo) - Mexico	55.55	17.02	72.57	62,355	113,317	(6,124)
PLAYA PARAISO MAYA, S.A. DE CV, IN LIQUIDATION (1)	Real estate	Playa del Carmen (Quintana Roo) - Mexico	57.17	15.40	72.57	89,434	1,561	13,258
PROMOCIONES Y PROYECTOS MURCILOR, S.L., IN LIQUIDATION (1)	Property development	Lorca (Murcia) - Spain	50.00	-	50.00	9,622	33,613	(2,447)
PROYECTOS Y DESARROLLOS HISPANOMEXICANOS, S.A., DE CV, IN LIQUIDATION (1)	Real estate	Playa del Carmen (Quintana Roo) - Mexico	-	72.57	72.57	51,937	52,735	(4,427)
SOL EDIFICAT PONENT, S.L.	Property development	Vilafranca del Penedès (Barcelona) - Spain	50.00	-	50.00	11,330	36,526	-

(1) Companies in the process of liquidation

(*) Latest available data, unaudited

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Appendix V – Loan securitisation

(in thousands of euros)

ITEM	31/12/2020		31/12/2019	
	Amount	Maturity	Amount	Maturity
RMBS I loan securitisation	613,284	2049	662,128	2049
RMBS II loan securitisation	537,951	2049	577,017	2049
RMBS III loan securitisation	1,112,996	2050	1,180,913	2050
RMBS IV loan securitisation	822,325	2050	877,069	2050
MADRID RESIDENCIAL I loan securitisation	366,951	2051	391,840	2051
MADRID RESIDENCIAL II loan securitisation	334,757	2049	356,077	2049
BANCAJA 7 loan securitisation	194,836	2034	229,153	2034
BANCAJA 8 loan securitisation	243,618	2034	280,439	2034
MBS BANCAJA 2 loan securitisation	-	2035	87,883	2035
BANCAJA 9 loan securitisation	389,685	2040	436,336	2040
MBS BANCAJA 3 loan securitisation	124,450	2040	141,838	2040
BANCAJA 10 loan securitisation	752,969	2046	882,937	2046
MBS BANCAJA 4 loan securitisation	359,007	2050	407,571	2050
BANCAJA 11 loan securitisation	672,782	2047	777,356	2047
BANCAJA 13 loan securitisation	1,359,867	2048	1,468,810	2048
MBS BANCAJA 6 loan securitisation	317,318	2048	351,491	2048
BANCAJA-BVA VPO 1 loan securitisation	-	2047	95,871	2047
AyT HIPOTECARIO MIXTO II loan securitisation	-	2036	18,920	2036
AyT CAJA MURCIA HIP I loan securitisation	34,381	2035	42,639	2035
AyT CAJA MURCIA HIP II loan securitisation	38,220	2036	45,959	2036
AyT HIPOTECARIO MIXTO V loan securitisation	47,764	2041	54,067	2041
AyT HIPOTECARIO MIXTO loan securitisation	-	2033	10,453	2033
AyT CAJA GRANADA HIPOTECARIO I loan securitisation	84,888	2037	95,285	2037
TDA 22 MIXTO loan securitisation	8,443	2044	10,149	2044
TDA 27 loan securitisation	47,073	2047	52,918	2047
CAIXA PENEDES 1 TDA loan securitisation	1,950	2043	2,217	2043
CAIXA PENEDES 2 TDA loan securitisation	1,169	2045	1,428	2045
CAIXA PENEDES FTGENCAT 1 TDA loan securitisation	3,105	2049	3,306	2049
CAIXA PENEDES PYMES 1 TDA loan securitisation	4,610	2045	4,907	2045
TDA 20 MIXTO loan securitisation	17,456	2036	20,054	2036
Total on the balance sheet	8,491,855		9,567,031	

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(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Appendix VI - Financial liabilities at amortised cost - Debt securities issued

Details of this heading on the balance sheet at 31 December 2020 and 2019 are as follows:

(in thousands of euros)

TYPE OF DEBT SECURITY	Currency	Final maturity	Nominal amount 2020	Annual interest rate	Nominal amount 2019	Credit rating Issuer/Issue (1)	Type of guarantee given
Debt securities issued							
Bankia ICO Line Bond 2014-8	euro	2020	-	EUR 6M+ 2.35%	524	-	Bankia Personal Guarantee
Bankia ICO Line Bond 2014-15	euro	2020	-	EUR 6M+ 2.35%	1,262	-	Bankia Personal Guarantee
Bankia ICO Line Bond 2014-20	euro	2020	-	EUR 6M+ 2.35%	546	-	Bankia Personal Guarantee
Granada Senior Bond	euro	2022	30,000	Inflation-linked coupon	30,000	BBB (high)	Bankia Personal Guarantee
BN BANKIA 2019-1	euro	2024	500,000	0.88%	500,000	BBB (high)	Bankia Personal Guarantee
BN BANKIA SNP 2019-1	euro	2024	500,000	1.00%	500,000	BBB	Bankia Personal Guarantee
BN BANKIA 2019-2	euro	2026	750,000	0.75%	750,000	BBB (high)	Bankia Personal Guarantee
BANKIA SNP 2019-2	euro	2026	750,000	1.13%	750,000	BBB	Bankia Personal Guarantee
CM Bond 29/12/28	euro	2028	65,000	4.76%	65,000	BBB (high)	Bankia Personal Guarantee
Caymadrid Bond	euro	2032	4,721	Irregular and zero coupon	5,032	BBB (high)	Bankia Personal Guarantee
Securitisations bonds	euro	-	1,049,179	-	1,369,538	-	-
Bankia Covered Bond 2016-1	euro	2021	1,000,000	0.88%	1,000,000	AAA	Mortgage Portfolio-Mortgage Law
CM Covered Bond 26/04/22	euro	2022	1,500,000	4.50%	1,500,000	AAA	Mortgage Portfolio-Mortgage Law
Bankia Covered Bond 2015-2	euro	2022	1,250,000	1.13%	1,250,000	AAA	Mortgage Portfolio-Mortgage Law
Bankia Covered Bond 2014-1	euro	2023	2,500,000	EUR 1M+1.40%	2,500,000	AAA	Mortgage Portfolio-Mortgage Law
Bankia Covered Bond 2016-2	euro	2023	1,000,000	1.00%	1,000,000	AAA	Mortgage Portfolio-Mortgage Law
CM Covered Bond 03/02/25	euro	2025	2,000,000	4.00%	2,000,000	AAA	Mortgage Portfolio-Mortgage Law
Bankia Covered Bond 2015-1	euro	2025	1,285,500	1%	1,285,500	AAA	Mortgage Portfolio-Mortgage Law
Bankia Covered Bond 2018-1	euro	2026	100,000	EUR 6M+0.18%	100,000	AAA	Mortgage Portfolio-Mortgage Law
Bankia Covered Bond 2018-2	euro	2026	400,000	EUR 6M+0.28%	400,000	AAA	Mortgage Portfolio-Mortgage Law
Bankia Covered Bond 2014-2	euro	2027	2,500,000	EUR 1M+1.40%	2,500,000	AAA	Mortgage Portfolio-Mortgage Law
Bankia Covered Bond 2019-1	euro	2027	475,000	EUR 6M+0.50%	475,000	AAA	Mortgage Portfolio-Mortgage Law
Bankia Covered Bond 2019-2	euro	2027	160,000	0.15%	160,000	AAA	Mortgage Portfolio-Mortgage Law
Bankia Covered Bond 2014-3	euro	2028	2,500,000	EUR 1M+1.40%	2,500,000	AAA	Mortgage Portfolio-Mortgage Law
CM Covered Bond 24/03/36	euro	2036	2,000,000	4.13%	2,000,000	AAA	Mortgage Portfolio-Mortgage Law
Bankia Public-Sector Covered Bond 2020-1	euro	2025	900,000	EUR 6M+0.25%	-	AA-	Public-sector loan portfolio
Bankia Subordinated Bond 2017-1	euro	2027	500,000	3.38%	500,000	BB+	Bankia Personal Guarantee
Bankia AT1 Bond	euro	PERP	750,000	6.00%	750,000	BB-	Bankia Personal Guarantee
Bankia AT1 Bond 2018	euro	PERP	500,000	6.38%	500,000	BB-	Bankia Personal Guarantee
BMN Subordinated Bond	euro	2026	175,000	9.00%	175,000	BB+	Bankia Personal Guarantee
Subordinated Bond 2019-1 3.75%	euro	2029	1,000,000	3.75%	1,000,000	BBB-	Bankia Personal Guarantee
Sum			26,144,400		25,567,402		
Treasury shares			(8,871,034)		(7,941,211)		
Valuation adjustments and other			1,163,428		1,053,518		
Closing balance (amortised cost)			18,436,794		18,679,709		

- (1) The ratings on Bankia AT1 and Bankia AT1 2018 Bonds were assigned by S&P Global Ratings and revised on 23 September 2020.
The ratings for the Bankia Subordinated Bond 2014-1, BMN Subordinated Bond, Bankia Subordinated Bond 2017-1 and Bankia Subordinated Bond 2019-1 were assigned by S&P Global Ratings and revised on 23 September 2020.
The ratings for all of the covered bonds were assigned by DBRS and revised on 18 September 2020.
The rating for the Bankia Public-Sector Covered Bond 2020-1 was assigned by S&P Global Ratings and revised on 17 December 2020.
Ratings of other issues were assigned by DBRS and revised on 24 September 2020.
- (2) As a result of the liquidation of Caymadrid.

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(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Appendix V – Movement in issues

Details of issues, repurchases and redemptions of debt instruments by the Bank or Group companies in 2020 and 2019:

31/12/2020

(in millions of euros)

Issuer information					Data for issues, repurchases and redemptions in 2020							
Country of residence	Transaction	Credit rating Issuer/Issue (1)	ISIN code	Type of security	Transaction date	Maturity date	Market where listed	Issue currency	Amount of issue/repurchase or redemption	Balance outstanding	Coupon	Type of guarantee given
Spain	Issue	AA-	ES0413307176	Bankia Public-Sector Covered Bond 2020-1	02/07/2020	02/07/2025	AIAF	euro	900	900	EUR 6M+0.25%	Public-sector loan portfolio
Spain	Redemption	BBB (high)	XS0147547177	Caymadrid Bond	06/05/2020	01/04/2032	LuxSE	euro	0.3	5	Irregular coupon until 2013, zero coupon thereafter	Bankia Personal Guarantee
Spain	Redemption	-	ES0213307012	Bankia ICO Line Bond 2014-8	10/01/2020	10/07/2020	AIAF	euro	0.5	-	EUR 6M+ 2.75%	Bankia Personal Guarantee
Spain	Redemption	-	ES0213307020	Bankia ICO Line Bond 2014-15	10/04/2020	10/10/2020	AIAF	euro	1.3	-	EUR 6M+ 2.35%	Bankia Personal Guarantee
Spain	Redemption	-	ES0213307038	Bankia ICO Line Bond 2014-20	10/06/2020	10/12/2020	AIAF	euro	0.5	-	EUR 6M+ 2.35%	Bankia Personal Guarantee
Other	Redemption	-	Other	Securitisation Bonds	Other	Other	Other	Other	320	-	-	-

- (1) The rating for the Bankia Public-Sector Covered Bond 2020-1 was assigned by S&P Global Ratings and revised on 17 December 2020. The rating for the Caymadrid Bond was assigned by DBRS and revised on 24 September 2020.

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(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31/12/2019

(in millions of euros)

Issuer information					Data for issues, repurchases and redemptions in 2019							
Country of residence	Transaction	Credit rating Issuer/Issue (1)	ISIN code	Type of security	Transaction date	Maturity date	Market where listed	Issue currency	Amount of issue/repurchase or redemption	Balance outstanding	Coupon	Type of guarantee given
Spain	Issue	BBB (low)	XS1951220596	Subordinated Bond 2019-1	15/02/2019	15/02/2029	Dublin	euro	1,000	1,000	3.75%	Bankia Personal Guarantee
Spain	Issue	AAA	ES0413307150	Bankia Covered Bond 2019-1	25/01/2019	25/01/2027	AIAF	euro	475	475	EUR 6M+0.50%	Mortgage Portfolio-Mortgage Law
Spain	Issue	BBB (high)	ES0313307201	Bankia Bond 2019-1	25/03/2019	25/03/2024	AIAF	euro	500	500	0.00875	Bankia Personal Guarantee
Spain	Issue	BBB	ES0313307219	Non-Preferential Ordinary Bond 2019-1	25/06/2019	25/06/2024	AIAF	euro	500	500	0.01	Bankia Personal Guarantee
Spain	Issue	AAA	ES0413307168	Bankia Covered Bond 2019-2	22/11/2019	22/11/2027	AIAF	euro	160	160	0.15%	Mortgage Portfolio-Mortgage Law
Spain	Issue	BBB	ES0213307061	Non-Preferential Ordinary Bond 2019-2	12/11/2019	12/11/2026	AIAF	euro	750	750	0.01125	Bankia Personal Guarantee
Spain	Issue	BBB (high)	ES0213307053	Bankia Bond 2019-2	09/07/2019	09/07/2026	AIAF	euro	750	750	0.0075	Bankia Personal Guarantee
Spain	Redemption	BBB (high)	ES0313307003	Bankia Bond 2014-1	17/01/2019	17/01/2019	AIAF	euro	1,000	-	0.035	Bankia Personal Guarantee
Spain	Redemption	BBB (high)	ES0413056047	BMN Covered Bond 5th Issue	21/01/2019	21/01/2019	AIAF	euro	500	-	0.03125	Mortgage Portfolio-Mortgage Law
Spain	Redemption	BBB (low)	ES0213307004	Bankia Subordinated Bond 2014-1	22/05/2019	22/05/2024	AIAF	euro	1,000	-	0.04	Bankia Personal Guarantee
Spain	Redemption	AAA	ES0414950693	CM Covered Bond 28/06/19	28/06/2007	28/06/2019	AIAF	euro	1,600	-	0.05	Mortgage Portfolio-Mortgage Law
Spain	Redemption	AAA	ES0413056039	BMN Covered Bond 4th Issue	12/07/2012	12/07/2019	AIAF	euro	1,300	-	EUR 12M + 5.00%	Mortgage Portfolio-Mortgage Law
Spain	Redemption	BBB (high)	XS0147547177	Caymadrid Bond	06/05/2002	01/04/2032	LuxSE	euro	-	5	Irregular coupon until 2013, zero coupon thereafter	Bankia Personal Guarantee
Spain	Redemption	-	ES0213307012	Bankia ICO Line Bond 2014-8	10/01/2019	10/07/2020	AIAF	euro	1	1	EUR 6M+ 2.75%	Bankia Personal Guarantee
Spain	Redemption	-	ES0213307020	Bankia ICO Line Bond 2014-15	10/04/2019	10/10/2020	AIAF	euro	1	1	EUR 6M+ 2.35%	Bankia Personal Guarantee
Spain	Redemption	-	ES0213307038	Bankia ICO Line Bond 2014-20	10/06/2019	10/12/2020	AIAF	euro	1	1	EUR 6M+ 2.35%	Bankia Personal Guarantee
Other	Redemption	-	Other	Securitisation Bonds	Other	Other	Other	Other	232	-	-	-

- (2) The ratings on Bankia AT1 Bonds were assigned by S&P Global Ratings on 31 May 2019.
The ratings on Covered Bonds were assigned by DBRS on 20 September 2019.
Ratings of other issues were assigned by DBRS on 2 July 2019.

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Appendix VIII – Information on the mortgage market

Marketable and non-marketable covered bonds issued by the Group and outstanding at 31 December 2020 are recognised on the balance sheet under "Financial liabilities at amortised cost" (see Note 19). The Group has no mortgage bonds in issue. These mortgage securities are governed mainly by Mortgage Market Law 2/1981, of 25 March, as amended by Law 41/2007, of 7 December, and by Royal Decree 716/2009, of 24 April, implementing certain provisions of the aforementioned Law.

Declarations by the Board of Directors of Bankia, S.A. concerning the existence of policies and procedures required by applicable regulations

In compliance with the requirements of applicable regulations, Bankia's Board of Directors declares that the Entity has express policies and procedures in relation to its mortgage market business, and that the Board of Directors is responsible for compliance with mortgage market regulations applicable to this business. These policies and procedures include, inter alia, (i) the criteria applied concerning the relationship that must exist between the amount of the loan and the appraisal value of the mortgaged property, and the influence of the existence of other additional collateral and the criteria applied in the selection of the appraisers; (ii) the relationship between the debt and the income of the borrower and the existence of procedures aimed at assuring the information supplied by the borrower and the borrower's solvency; (iii) the prevention of imbalances between flows from the hedging portfolio and those arising from making the payments owed on the securities.

Regarding mortgage market laws and regulations, Bankia has in place suitable mortgage risk policies and procedures in the two major areas – assets and liabilities – to monitor and quantify the mortgage portfolio and the related borrowing limits.

In terms of assets, mortgage risk exposure policy takes the form of multilevel decision-making in the Group by means of a system of authorities and delegated powers.

The Group has a "Credit Risk Document Structure", approved by the Board of Directors in May 2018, that is revised annually in keeping with the management principles of the Entity and with supervisory expectations. The "Credit Risk Document Structure" is composed of the Credit Risk Policies, Methods and Procedures Framework, the Credit Risk Policies, Specific Criteria Manuals and Operational Manuals.

- The Credit Risk Policies, Methods and Procedures Framework. This contains criteria and guidelines to ensure adequate management of the approval, monitoring and recovery process and the proper classification and coverage of transactions over their entire life cycle. It also allows high-level action limits to be established by setting general principles that are adjusted accordingly in the policies.
- The Credit Risk Policies contain the set of rules that constitute the credit risk management guidelines. They are effective and consistent with the general principles set out in the Policies Framework and in the Risk Appetite Framework and are applied across the entire Entity. They are used internally to create and develop rules and regulations on risks as regards competencies related to risk strategy, implementation and control.
- The Specific Criteria Manuals provide a detailed description of the criteria set out in the policies regulating the activities carried out by the Entity. They are there for consultative purposes to enable the correct and proper performance of activities in accordance with the requirements previously put in place, thus minimising operational risk. The Specific Criteria Manuals combine with certain policies to provide Group-wide risk management.
- The Operating Manuals are methodological documents that develop and expand upon the criteria set out in the Policies and the Specific Criteria Manuals. They are there for consultative purposes to enable the correct and proper performance of activities in accordance with the requirements previously established. These manuals remain permanently in sync with the Credit Risk Policies and Criteria Manuals.

To ensure proper governance of the Credit Risk Policies Framework, the Board of Directors delegates authority to the Risk Committee to approve the Specific Criteria Manual for Credit Risk Policies, Methods and Procedures and authority to the Provisions Committee to approve the Specific Criteria Manual for Policies, Methods and Procedures for Classifying and Hedging Credit Risk.

The Risk Committee and the Provisions Committee exercise these powers by periodically reviewing and updating, over the course of the year, the Specific Criteria Manual for Credit Risk Policies, Methods and Procedures and the Specific Criteria Manual for Policies, Methods and Procedures for Classifying and Hedging Credit Risk. They adjust and tailor the specific criteria contained in both documents to the Entity's prevailing risk strategy and appetite and to regulatory requirements.

The criteria and policies approved are mandatory for the committee under whose remit the transaction falls, and such committee shall be responsible for compliance therewith in the transaction approval process.

Additionally, as a result of the exceptional circumstances caused by COVID-19, a document named "Powers, Policies, Specific Criteria and Control Framework Covid19" has been added to the document structure, which contains the adaptations made to the current credit risk policies and specific criteria, as well as the powers established to address the solutions made available to customers following the declaration of the state of emergency and subsequent entry into force of Royal Decree-Laws 8/2020 and 11/2020. This document is of a transitory nature and will remain in force for as long as the aforementioned measures are applicable.

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General approval criteria include those associated with borrower risk, mainly the ability of the borrower to repay, with no reliance on guarantors or assets delivered as collateral, which are considered as alternative methods of collection.

Consideration is also given to criteria associated with the transaction, mainly the suitability of financing in accordance with the customer's risk profile and adaptation of the product to the intended purpose.

Specific policies for the mortgage portfolio establish considerations concerning the appraisal value associated with the loan as a cut-off point in the approval proposal, when granting loans on a LTV basis.

Risk management of this portfolio is based on a mandatory scoring methodology approved by the Supervisor, with specific monitoring of the cut-off points associated with the decision-making structure.

Other basic criteria are the maximum timelines of the transactions and the type of products sold by the Group.

The guidelines laid out in the credit risk policies acknowledge real estate collateral subject to certain requirements, such as a first-charge requirement, and compliance with measurement criteria in accordance with the stipulations of prevailing regulations.

Any imbalance between mortgage portfolio flows and issued securities is managed by a regular review of key portfolio parameters followed by a report to credit rating agencies for the purpose of monitoring issued securities.

IT systems are in place to record, monitor and quantify these elements and to assess the degree of compliance with mortgage market requirements for the purposes of portfolio eligibility for covering the Group's related borrowings.

In terms of liabilities, in line with its financing strategy in place at each given time in the light of the outstanding mortgage portfolio, the Group makes mortgage security issuance decisions on the basis of records that enable it to keep its issued securities within the bounds of eligibility for covering borrowings in compliance with mortgage market laws and regulations.

Disclosures on guarantees and privileges enjoyed by holders of mortgage securities issued by Bankia

Pursuant to current legislation, the principal and interest of the covered bonds issued by Bankia are specially secured (entry in the Property Register is not required) by mortgages on all the covered bonds that are registered in Bankia's name at any time, without prejudice to its unlimited liability. The covered bonds entitle the holders not only to the aforementioned guaranteed financial claim but also to claim payment from the issuer after maturity, and confer on the holders the status of special preferential creditors vis-à-vis all other creditors in relation to all the mortgage loans and credits registered in the issuer's name.

Disclosures on mortgage market security issues

Note 19 discloses the outstanding balances of non-marketable (one-off) covered bonds issued by Bankia. In addition, Appendix VI to the 2020 consolidated financial statements individually itemises the outstanding balances of marketable covered bonds issued by Bankia with their maturities, currencies and reference rates.

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The following table itemises the aggregate nominal value of marketable and non-marketable covered bonds outstanding at 31 December 2020 and 2019 issued by Bankia, regardless of whether or not they are recognised as liabilities of the Group (in the latter case, due to the fact that they were not placed with third parties or because they were repurchased by Bankia), based on their residual maturity period, with a distinction made, in the case of those recognised by the Group as debt securities, between those issued through a public offering and with no public offering, along with the aggregate nominal values of mortgage participation certificates and mortgage transfer certificates issued by Bankia and outstanding at 31 December 2020 and 2019.

(in thousands of euros)

	Nominal value	Average residual maturity period (months) (a)	Nominal value	Average residual maturity period (months) (a)
MORTGAGE SECURITIES	31/12/2020		31/12/2019	
Mortgage bonds issued (b)	-		-	
Of which: recognised under liabilities	-		-	
Covered bonds issued (b)	23,487,608		23,905,525	
Of which: recognised under liabilities	15,511,308		15,958,425	
Debt securities. Issued through a public offering (c)	10,035,500		10,035,500	
Residual maturity up to one year	1,000,000		-	
Residual maturity over one year but not more than two years	2,750,000		1,000,000	
Residual maturity over two years but not more than three years	1,000,000		2,750,000	
Residual maturity over three years but not more than five years	3,285,500		1,000,000	
Residual maturity over five years but not more than ten years	-		3,285,500	
Residual maturity over ten years	2,000,000		2,000,000	
Debt securities. Other issues (c)	8,635,000		8,635,000	
Residual maturity up to one year	-		-	
Residual maturity over one year but not more than two years	-		-	
Residual maturity over two years but not more than three years	2,500,000		-	
Residual maturity over three years but not more than five years	-		2,500,000	
Residual maturity over five years but not more than ten years	6,135,000		6,135,000	
Residual maturity over ten years	-		-	
Deposits (d)	4,817,108		5,235,025	
Residual maturity up to one year	1,025,000		417,917	
Residual maturity over one year but not more than two years	585,185		1,025,000	
Residual maturity over two years but not more than three years	325,000		585,185	
Residual maturity over three years but not more than five years	1,276,923		325,000	
Residual maturity over five years but not more than ten years	730,000		2,006,923	
Residual maturity over ten years	875,000		875,000	
Mortgage participation certificates issued (e)	262,213	141	330,046	145
Issued in a public offering	258,482	140	311,467	147
Other issues	3,731	143	18,579	118
Mortgage transfer certificates issued (e)	7,875,630	212	8,882,955	219
Issued in a public offering	23,297	113	29,143	121
Other issues	7,852,333	212	8,853,812	219

(a) Weighted average residual maturity by amounts, expressed in months rounded up.

(b) Mortgage bonds and covered bonds include all instruments issued and outstanding, even if they have not been recognised under liabilities (because they have not been placed with third parties or have been repurchased).

(c) These bonds are recognised under "Financial liabilities at amortised cost - Debt securities issued" on the accompanying balance sheets at 31 December 2020 and 2019 (see Note 19).

(d) These bonds are recognised under "Financial liabilities at amortised cost - Deposits from credit institutions" and "Financial liabilities at amortised cost - Deposits from customers" on the accompanying balance sheets at 31 December 2020 and 2019 (see Note 19).

(e) Amount of mortgage participation and mortgage transfer certificates issued related exclusively to mortgage loans recognised in assets (held on the balance sheet).

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The nominal value at 31 December 2020 and 2019 of the amounts available (committed amounts not drawn down) of all mortgage loans and credits, with a distinction made between those potentially eligible and those that are not eligible, is shown in the table below:

(in thousands of euros)

ITEM	Undrawn balances (nominal value) (2)	
	31/12/2020	31/12/2019
Total mortgage loans that back the issuance of covered bonds (1)	1,581,613	1,292,621
Of which:		
Potentially eligible (3)	58,821	66,859
Not eligible	1,522,792	1,225,762

(1) At 31 December 2020 and 2019, Bankia had no mortgage bonds in issue.

(2) Committed amounts (limit) less amounts drawn down on all loans with mortgage guarantee, irrespective of the total risk as a percentage of the latest appraisal value (loan-to-value), not transferred to third parties or relating to financing received. Also includes balances that are only delivered to developers when the dwellings are sold.

(3) Loans potentially eligible for issuance of covered bonds under Article 3 of Royal Decree 716/2009.

With regard to lending transactions, the table below shows the breakdown at 31 December 2020 and 2019 of the nominal value of mortgage loans and credit facilities that back the issue of covered bonds by Bankia (as already specified, at the aforementioned reporting dates Bankia had no mortgage bonds in issue), indicating the total eligible loans and credit facilities, without regard to the limits under Article 12 of Royal Decree 716/2009, of 24 April, and those which, pursuant to the criteria of the aforementioned Article 12 of Royal Decree 716/2009, are eligible for issuance of mortgage securities.

This amount is presented, as required by applicable legislation, as the difference between the nominal value of the entire portfolio of loans and credits secured through mortgages registered in favour of Bankia and pending collection (including, where applicable, those acquired through mortgage participation certificates and mortgage transfer certificates), even if they have been derecognised, irrespective of the proportion of the risk of the loan to the latest available appraisal for purposes of the mortgage market, less the mortgage loans and credits transferred through mortgage participation certificates and mortgage transfer certificates, regardless of whether or not they were derecognised from the balance sheet, and those designated as security for financing received (the amount recognised under assets on the balance sheet is also indicated for mortgage loans and credits transferred):

(in thousands of euros)

ITEM	Nominal value	
	31/12/2020	31/12/2019
Total loans (a)	73,929,803	77,027,730
Mortgage participation certificates issued (b)	262,213	330,046
<i>Of which: loans held on the balance sheet (c)</i>	<i>262,213</i>	<i>330,046</i>
Mortgage transfer certificates issued	9,236,011	10,342,905
<i>Of which: loans held on the balance sheet (c)</i>	<i>7,875,630</i>	<i>8,882,955</i>
Mortgage loans pledged as security for financing received	-	-
Loans that back the issue of mortgage bonds and covered bonds (d)	64,431,579	66,354,779
Ineligible loans (e)	11,748,853	12,767,505
Loans that meet the requirements to be eligible except for the limit established in Article 5.1 of Royal Decree 716/2009	5,911,143	6,686,745
Other	5,837,710	6,080,760
Eligible loans (f)	52,682,726	53,587,274
Loans to cover mortgage bond issues	-	-
Loans eligible to secure covered bond issues	52,682,726	53,587,274
Ineligible amounts (g)	111,733	113,813
Eligible amounts	52,570,993	53,473,461

(a) Principal drawn down on loans with mortgage guarantee in favour of the entity (including those acquired through mortgage participation or mortgage transfer certificates), even if such loans have been derecognised, regardless of the loan-to-value readings.

(b) Principal drawn down on loans that have been transferred through mortgage participation or mortgage transfer certificates, even if such loans have been derecognised.

(c) Principal drawn down on loans that have been transferred, but not derecognised.

(d) Total loans less the sum of mortgage participation certificates issued, mortgage transfer certificates issued and mortgage loans pledged to secure financing received.

(e) Loans with mortgage guarantee not transferred to third parties and not pledged to secure financing received that do not meet the eligibility requirements of Article 3 of Royal Decree 716/2009 for mortgage bond and covered bond issues.

(f) Loans eligible for mortgage bond and covered bond issues according to Article 3 of Royal Decree 716/2009, without deducting the eligibility limits established by Article 12 therein.

(g) Amount of the eligible loans which, pursuant to the criteria laid down in Article 12 of Royal Decree 716/2009, are not eligible to cover issuance of mortgage bonds and covered bonds.

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The reconciliation between eligible loans and covered bonds issued is as follows, along with issuance capacity and percentage of over-collateralisation:

(in thousands of euros)

ITEM	Nominal value	
	31/12/2020	31/12/2019
Loans that back mortgage bonds and covered bonds (a)	64,431,579	66,354,779
Mortgage loans and credits which, pursuant to the criteria laid down in Article 12 of Royal Decree 716/2009, are eligible to cover issuance of mortgage securities (b)	52,570,993	53,473,461
Issue limit = 80% of eligible mortgage loans and credits	42,056,794	42,778,769
Covered bonds issued (c)	23,487,608	23,905,525
Covered bonds issuance capacity (1) (Note 3.2)	18,569,186	18,873,244
Memorandum item:		
Percentage of over-collateralisation of the portfolio (a)/(c)	274%	278%
Percentage of over-collateralisation of the eligible portfolio (b)/(c)	224%	224%

⁽¹⁾ At 31 December 2020, EUR 7,976,300 thousand of covered bonds remained on the consolidated balance sheet. Therefore, the issuance capacity would be EUR 26,545,486 thousand (EUR 7,947,100 thousand at 31 December 2019, with a EUR 26,820,344 thousand issuance capacity).

The table below shows details at 31 December 2020 and 2019 of the nominal value of the loans and credits that back covered bonds issued by Bankia and of those loans and credits that are eligible, without taking into consideration the restrictions on their eligibility established in Article 12 of Royal Decree 716/2009, based on (i) whether they arose from Bankia or from creditor subrogation and other cases; (ii) whether they are denominated in euros or in other currencies; (iii) whether they have a normal payment situation and other cases; (iv) their average residual maturity; (v) whether the interest rate is fixed, floating or mixed; (vi) whether the transactions are aimed at legal entities or individuals that are to use the loan proceeds for the purpose of their business activity (with a disclosure of the portion related to property development) and transactions aimed at households; (vii) whether the guarantee consists of assets/completed buildings (with a distinction made between those used for residential, commercial and other purposes), assets/buildings under construction (with a disclosure similar to that of the completed buildings) or land (with a distinction made between developed land and other land), indicating the transactions that are secured by government-subsidised housing, even that under development:

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(in thousands of euros)

ITEM	Loans that back mortgage bonds and covered bonds (a)		Of which: eligible loans (b)	
	31/12/2020	31/12/2019	31/12/2020	31/12/2019
TOTAL	64,431,579	66,354,779	52,682,726	53,587,274
ORIGIN OF TRANSACTIONS	64,431,579	66,354,779	52,682,726	53,587,274
Originated by the Entity	63,850,128	65,924,173	52,109,930	53,164,603
Subrogated from other institutions	581,451	430,606	572,796	422,671
Other	-	-	-	-
CURRENCY	64,431,579	66,354,779	52,682,726	53,587,274
Euro	64,349,202	66,209,707	52,624,309	53,472,955
Other currencies	82,377	145,072	58,417	114,319
PAYMENT SITUATION	64,431,579	66,354,779	52,682,726	53,587,274
Normal payment situation	60,847,328	62,645,748	51,929,943	52,856,551
Other situations	3,584,251	3,709,031	752,783	730,723
AVERAGE RESIDUAL MATURITY	64,431,579	66,354,779	52,682,726	53,587,274
Up to 10 years	11,009,971	11,191,162	9,264,112	9,316,312
More than 10 years and up to 20 years	25,011,037	26,267,433	22,518,193	23,471,889
More than 20 years and up to 30 years	21,744,824	20,770,047	18,990,543	17,777,422
More than 30 years	6,665,747	8,126,137	1,909,878	3,021,651
INTEREST RATES	64,431,579	66,354,779	52,682,726	53,587,274
Fixed	7,551,655	5,723,525	6,648,083	4,884,817
Floating	49,925,613	54,006,824	40,053,454	43,194,646
Mixed	6,954,311	6,624,430	5,981,189	5,507,811
BORROWER	64,431,579	66,354,779	52,682,726	53,587,274
Legal entities and sole proprietorships (business activities)	7,625,099	8,081,727	4,343,949	4,694,622
<i>Of which: real estate construction and property development (including land)</i>	<i>870,571</i>	<i>732,463</i>	<i>239,214</i>	<i>239,404</i>
Other households	56,806,480	58,273,052	48,338,777	48,892,652
TYPE OF COLLATERAL	64,431,579	66,354,779	52,682,726	53,587,274
Assets/completed buildings	63,102,281	64,840,580	52,355,525	53,145,627
Housing	57,427,605	58,832,399	48,672,492	49,273,933
<i>Of which: government-subsidised housing</i>	<i>2,296,416</i>	<i>2,270,496</i>	<i>1,975,006</i>	<i>1,935,044</i>
Offices and commercial premises	2,205,675	2,433,144	1,516,891	1,670,182
Other buildings and constructions	3,469,001	3,575,037	2,166,142	2,201,512
Assets/buildings under construction	411,316	409,717	66,648	75,023
Housing	309,659	273,761	30,901	29,937
<i>Of which: government-subsidised housing</i>	<i>20,175</i>	<i>15,039</i>	-	98
Offices and commercial premises	33,187	34,433	14,455	10,971
Other buildings and constructions	68,470	101,523	21,292	34,115
Land	917,982	1,104,482	260,553	366,624
Developed urban land	219,796	237,660	54,117	61,470
Other land	698,186	866,822	206,436	305,154

(a) Principal drawn down on loans with mortgage guarantee not transferred to third parties and not pledged to secure financing received, regardless of the loan-to-value readings.

(b) Loans eligible for mortgage bond and covered bond issues according to Article 3 of Royal Decree 716/2009, without deducting the eligibility limits established by Article 12 therein.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

The nominal value of eligible mortgage loans and credits at 31 December 2020 and 2019, broken down by the ratios of the amount of the transactions to the latest available appraisal value of the mortgaged assets for mortgage market purposes (loan-to-value), is shown in the tables below:

31 December 2020

(in thousands of euros)

ITEM	Ratio of principal drawn down to latest available appraisal value ("Loan-to-value")				Total
	Less than or equal to 40%	More than 40% and less than or equal to 60%	More than 60% and less than or equal to 80%	More than 80%	
Loans eligible for issuance of covered bonds and mortgage bonds (a)					52,682,726
Housing	16,032,472	19,816,368	12,854,554	-	48,703,394
Other assets	2,360,151	1,619,181			3,979,332

(a) Loans eligible for mortgage bond and covered bond issues according to Article 3 of Royal Decree 716/2009, without deducting the eligibility limits established by Article 12 therein.

31 December 2019

(in thousands of euros)

ITEM	Ratio of principal drawn down to latest available appraisal value ("Loan-to-value")				Total
	Less than or equal to 40%	More than 40% and less than or equal to 60%	More than 60% and less than or equal to 80%	More than 80%	
Loans eligible for issuance of covered bonds and mortgage bonds (a)					53,587,274
Housing	15,907,795	20,391,030	13,005,045	-	49,303,870
Other assets	2,589,144	1,694,260			4,283,404

(a) Loans eligible for mortgage bond and covered bond issues according to Article 3 of Royal Decree 716/2009, without deducting the eligibility limits established by Article 12 therein.

Movements in the nominal amounts of mortgage loans backing the issuance of mortgage bonds and covered bonds are as follows:

(in thousands of euros)

MOVEMENTS	Eligible loans (a)	Ineligible loans (b)	Eligible loans (a)	Ineligible loans (b)
	31/12/2020	31/12/2020	31/12/2019	31/12/2019
Opening balance	53,587,274	12,767,505	55,397,064	15,878,578
Disposals in the period	(4,579,466)	(2,024,921)	(6,511,022)	(4,793,427)
Principal due collected in cash	(106,220)	(85,541)	(116,477)	(133,718)
Early repayments	(1,164,937)	(330,106)	(1,333,517)	(702,418)
Subrogation by other institutions	-	-	-	-
Others	(3,308,309)	(1,609,274)	(5,061,028)	(3,957,291)
Additions in the period	3,674,918	1,006,269	4,701,232	1,682,354
Originated by the Entity	3,475,559	1,002,256	4,668,503	1,679,759
Subrogation from other institutions	199,359	4,013	32,729	2,595
Others	-	-	-	-
Closing balance	52,682,726	11,748,853	53,587,274	12,767,505

(a) Loans eligible for mortgage bond and covered bond issues according to Article 3 of Royal Decree 716/2009, without deducting the eligibility limits established by Article 12 therein.

(b) Loans with mortgage guarantee not transferred to third parties and not pledged to secure financing received that do not meet the eligibility requirements of Article 3 of Royal Decree 716/2009 for mortgage bond and covered bond issues.

At 31 December 2020 and 2019 there were no replacement assets backing the Group's covered bond issues.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Appendix IX – Exposure to the real estate construction and property development sector in Spain

1. Exposure to real estate construction and property development

The table below shows cumulative figures of the financing granted by the Group at 31 December 2020 and 2019 for real estate construction and property development and the respective credit risk allowances and provisions in place at that date (a):

31 December 2020

(in thousands of euros)			
ITEM	Gross carrying amount (b)	Surplus of gross exposure over the maximum recoverable amount of effective collateral (c)	Accumulated impairment (d)
Financing of real estate construction and property development (business in Spain) (e)	1,152,945	337,801	(123,530)
Of which: non-performing	228,643	102,144	(117,650)
Memorandum item:			
Assets written off (f)	355,075		
Memorandum item (consolidated Group figures):			
(in thousands of euros)			
Item	Amount		
Loans to customers, excluding general government (business in Spain) (carrying amount) (g)	114,353,054		
Total consolidated assets (all business) (carrying amount)	209,841,949		
Impairment and provisions for performing exposures (all business) (h)	(888,288)		

(a) Classification of financing in the table according to the purpose of the loans and not the borrower's industry classification (CNAE). Accordingly, if the borrower is a real estate company, but uses the financing granted for a purpose other than real estate construction or property development, it is not included in this table. And if the borrower is a company whose core business is not real estate construction or property development, but the loan is used to finance property development, it is included in this table.

(b) Amount prior to the deduction of any impairment losses.

(c) Amount calculated as provided for in rule 64.16.k) of Circular 4/2017.

(d) Amount of allowances and provisions made by the entity for these transactions.

(e) Includes all types of financing in the form of loans, with and without mortgage guarantee, and debt securities for real estate construction and property development related to the activity in Spain (business in Spain).

(f) Gross loans to finance real estate construction and property development recognised by the Group (business in Spain) that have been derecognised due to classification as "written-off assets".

(g) Amount at which the asset is recognised on the balance sheet after deduction of any allowances and provisions.

(h) Total amount of credit risk allowances and provisions for exposures classified as performing in accordance with Annex IX of Circular 4/2017, for total activity (all business).

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31 December 2019

(in thousands of euros)

ITEM	Gross carrying amount (b)	Surplus of gross exposure over the maximum recoverable amount of effective collateral (c)	Accumulated impairment (d)
Financing of real estate construction and property development (business in Spain) (e)	1,403,325	348,652	(180,073)
Of which: non-performing	331,601	126,374	(170,571)

Memorandum item:

Assets written off (f)	350,300
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Memorandum item (consolidated Group figures):

(in thousands of euros)

Item	Amount
Loans to customers, excluding general government (business in Spain) (carrying amount) (g)	111,657,346
Total consolidated assets (all business) (carrying amount)	208,468,273
Impairment and provisions for performing exposures (all business) (h)	(726,458)

(a) Classification of financing in the table according to the purpose of the loans and not the borrower's industry classification (CNAE). Accordingly, if the borrower is a real estate company, but uses the financing granted for a purpose other than real estate construction or property development, it is not included in this table. And if the borrower is a company whose core business is not real estate construction or property development, but the loan is used to finance property development, it is included in this table.

(b) Amount prior to the deduction of any impairment losses.

(c) Amount calculated as provided for in rule 64.16.k) of Circular 4/2017.

(d) Amount of allowances and provisions made by the entity for these transactions.

(e) Includes all types of financing in the form of loans, with and without mortgage guarantee, and debt securities for real estate construction and property development related to the activity in Spain (business in Spain).

(f) Gross loans to finance real estate construction and property development recognised by the Group (business in Spain) that have been derecognised due to classification as "written-off assets".

(g) Amount at which the asset is recognised on the balance sheet after deduction of any allowances and provisions.

(h) Total amount of credit risk allowances and provisions for exposures classified as performing in accordance with Annex IX of Circular 4/2017, for total activity (all business).

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

The table below breaks down financing for real estate construction and property development at 31 December 2020 and 2019 with respect to transactions recognised by Group credit institutions:

(in thousands of euros)

ITEM	Financing for real estate construction and property development (gross carrying amount) (a)	
	31/12/2020	31/12/2019
1. Not secured by real estate collateral	253,758	302,353
2. Secured by real estate collateral (b)	899,187	1,100,972
2.1. Completed buildings (c)	452,874	556,986
2.1.1. Housing	319,314	394,197
2.1.2. Other	133,560	162,789
2.2. Buildings under construction (c)	167,560	204,229
2.2.1. Housing	164,488	200,485
2.2.2. Other	3,072	3,744
2.3. Land	278,753	339,757
2.3.1. Developed urban land	113,184	137,954
2.3.2. Other land	165,569	201,803
Total	1,152,945	1,403,325

(a) Amount prior to the deduction of accumulated impairment losses, if any.

(b) Includes all transactions secured by real estate collateral, regardless of the legal form of the guarantee or loan-to-value readings.

(c) If a building serves more than one purpose, e.g. residential (housing) and other uses, the related financing is included in the category representing the main use given to it.

2. Loans to households for housing purchases. Transactions recognised by credit institutions (business in Spain)

The table below presents details at 31 December 2020 and 2019 of financing granted by the Group for housing purchases (business in Spain) (a):

(in thousands of euros)

ITEM	Gross carrying amount (b)		Of which: non-performing	
	31/12/2020		31/12/2019	
Loans for housing purchases	60,235,618	2,104,185	62,359,686	2,044,531
Without a mortgage	474,036	6,082	519,337	9,408
With a mortgage (c)	59,761,582	2,098,103	61,840,349	2,035,123

(d) Loans with or without mortgage guarantee to finance housing purchases relating to business in Spain.

(e) Amounts prior to the deduction of accumulated impairment losses, if any.

(f) Includes all transactions with mortgage guarantee, regardless of the loan-to-value readings.

The table below presents details of loans with mortgage guarantee extended to households for housing purchases at 31 December 2020 and 2019, classified by the ratio of the outstanding amount to the latest available appraisal value (LTV) in respect of transactions recognised by Group credit institutions (business in Spain):

31 December 2020

(in thousands of euros)

ITEM	LTV ranges (a)					
	Less than or equal to 40%	More than 40% and less than or equal to 60%	More than 60% and less than or equal to 80%	More than 80% and less than or equal to 100%	More than 100%	Total
Gross carrying amount (b)	15,659,065	21,643,661	16,556,562	2,853,495	3,048,799	59,761,582
Of which: non-performing (b)	150,553	210,878	295,499	331,474	1,109,699	2,098,103

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

(a) The loan-to-value ratio is obtained by dividing the gross carrying amount of the exposure at the reporting date by the amount of the latest available appraisal.

(b) Amount prior to the deduction of accumulated impairment losses, if any.

31 December 2019

(in thousands of euros)

ITEM	Less than or equal to 40%	LTV ranges (a)				Total
		More than 40% and less than or equal to 60%	More than 60% and less than or equal to 80%	More than 80% and less than or equal to 100%	More than 100%	
Gross carrying amount (b)	15,561,386	22,210,415	17,464,604	3,338,254	3,265,690	61,840,349
Of which: non-performing (b)	143,307	204,084	273,533	311,556	1,102,643	2,035,123

(a) The loan-to-value ratio is obtained by dividing the gross carrying amount of the exposure at the reporting date by the amount of the latest available appraisal.

(b) Amount prior to the deduction of accumulated impairment losses, if any.

3. Information concerning real estate assets foreclosed or received in payment of debt (business in Spain)

The Group uses an internal approach to estimate discounts on the reference value and the cost of disposal of non-current real estate assets held for sale that have been foreclosed or received in payment of debt (hereinafter “foreclosed assets”).

In order to expedite the management and sale of foreclosed assets, the Group has engaged a specialised third party, Haya Real Estate, to service, manage and market the foreclosed assets under the supervision of the Real Estate Management Department.

Following the wholesale portfolio sales in 2019, progress has been made in 2020 on integrating the internal foreclosed asset approach into management through the culmination of various projects. In this regard, new tools have been developed to enhance the information available, which improves decision-making processes regarding commercial activities to enhance the evaluation of the assets organically. The Group has not made any significant wholesale portfolio sales in this period. The governance and control processes of the appraisals used to estimate the discounts on the reference value have also been improved.

As regards the recurring management and control of the assets, to maintain them in optimum condition for sale and to ensure the expenses incurred are controlled, the Entity carries out technical monitoring and it controls and manages the invoicing of the maintenance expenses derived from holding the foreclosed assets on the balance sheet. The agreement with Haya Real Estate also includes the administration of lease contracts on the portfolio assets and the management of their occupancy status.

Marketing activities are also performed: customer services, review of the assets published and management of offers through various sales channels: network branches, brokers, web, events and trade fairs, etc.

The Group's general policies for managing its foreclosed assets are summarised as follows:

- The volume of foreclosed assets, irrespective of how they are managed (on the entities' balance sheets, through companies created for this purpose, vehicles, etc.) makes it necessary from the outset to implement the measures required for management purposes, with the combined objective of divesting the largest volume of foreclosed assets with the least possible detriment to the income statement.
- To unlock the value of foreclosed assets, the focus is first on sales and second on rentals, to obtain returns and address specific circumstances related to the Housing Social Fund and/or special rentals. In the case of unique assets (specific buildings, offices, commercial premises, industrial buildings and land), the general policy is to sell these assets.
- Policy of transparency, competition and advertising in all transactions to guarantee public offering of the asset.
- Asset pricing policies and delegated powers. Sales in accordance with the authorisation system in force at any given time.
- Assessment of asset sale offers in any situation.
- The marketing process will be carried out through all the channels established: network branches, web, auctions, 'corners', brokers, trade fairs and events, etc.

The pricing policies and principles for the property portfolio may be summarised as follows:

- Transparency: all assets available for sale are published exclusively on the website www.haya.es with their retail prices.
- Pricing benchmarks: the reference prices will be those of comparable assets, the appraisal value of each asset, reports by mediators and any other input that contributes to determining the asset's market value.
- Adaptation to changes in the housing market: dynamic adaptation and review of prices in accordance with changes in the property market. Prices will be reviewed regularly, with updates of appraisals, observance of regulations and consideration of changes to the official housing market indexes.
- Special events: at trade fairs or other events, more attractive prices may be published for that period only.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

- Leases: real estate assets will be leased with a rent approved by the appropriate committee, which will always contemplate a minimum return in accordance with the value of the asset to be leased.

The table below presents consolidated details of assets foreclosed or received in payment of debt (business in Spain) at 31 December 2020 and 2019, classified by type (a):

31 December 2020

(in thousands of euros)

	Gross carrying amount (b)	Impairment allowances	Of which: Post-foreclosure impairment allowances	Net carrying amount
1. Real estate assets deriving from financing for real estate construction and property development (c)	493,135	(300,719)	(131,088)	192,416
1.1. Completed buildings	211,229	(104,224)	(39,476)	107,005
1.1.1. Housing	158,311	(78,150)	(25,891)	80,161
1.1.2. Other	52,918	(26,074)	(13,585)	26,844
1.2. Buildings under construction	50,769	(34,122)	(15,161)	16,647
1.2.1. Housing	49,094	(32,979)	(14,515)	16,115
1.2.2. Other	1,675	(1,143)	(646)	532
1.3. Land	231,137	(162,373)	(76,451)	68,764
1.3.1. Developed urban land	151,488	(105,089)	(39,160)	46,399
1.3.2. Other land	79,649	(57,284)	(37,291)	22,365
2. Real estate assets deriving from mortgage-secured financing granted to households for housing purchases	2,396,828	(1,336,324)	(494,873)	1,060,504
3. Other real estate assets foreclosed or received in payment of debt (d)	961,376	(466,892)	(150,796)	494,484
4. Equity instruments foreclosed or received in payment of debt	-	-	-	-
5. Equity investments in entities holding the real estate assets foreclosed or received in payment of debt (e)	-	-	-	-
6. Financing to entities holding the real estate assets foreclosed or received in payment of debt (e)	-	-	-	-

(a) Includes assets foreclosed or received in payment of debt deriving from financing granted in relation to business in Spain, as well as equity investments in and financing granted to the entities holding these assets.

(b) Amount prior to the deduction of accumulated impairment losses, if any.

(c) Includes real estate assets deriving from financing for real estate construction and property development, regardless of the sector and main economic activity of the company or sole proprietor delivering the asset.

(d) Includes real estate assets not arising from financing for real estate construction and property development or from mortgage-secured financing granted to households for housing purchases.

(e) Includes all equity investments in and financing to entities holding the assets foreclosed or received in payment of debt.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31 December 2019

(in thousands of euros)

ITEM	Gross carrying amount (b)	Impairment allowances	Of which: Post-foreclosure impairment allowances	Net carrying amount
1. Real estate assets deriving from financing for real estate construction and property development (c)	516,120	(301,015)	(121,821)	215,065
1.1. Completed buildings	238,459	(118,678)	(39,343)	119,781
1.1.1. Housing	182,714	(92,358)	(30,969)	90,356
1.1.2. Other	55,745	(26,320)	(8,374)	29,425
1.2. Buildings under construction	33,066	(20,007)	(9,052)	13,019
1.2.1. Housing	32,312	(19,510)	(8,514)	12,802
1.2.2. Other	754	(497)	(538)	217
1.3. Land	244,595	(162,330)	(73,426)	82,265
1.3.1. Developed urban land	150,610	(99,216)	(42,067)	51,394
1.3.2. Other land	93,985	(63,114)	(31,359)	30,871
2. Real estate assets deriving from mortgage-secured financing granted to households for housing purchases	2,466,678	(1,374,764)	(499,006)	1,091,914
3. Other real estate assets foreclosed or received in payment of debt (d)	985,271	(440,720)	(127,778)	544,551
4. Equity instruments foreclosed or received in payment of debt	-	-	-	-
5. Equity investments in entities holding the real estate assets foreclosed or received in payment of debt (e)	-	-	-	-
6. Financing to entities holding the real estate assets foreclosed or received in payment of debt (e)	-	-	-	-

(f) Includes assets foreclosed or received in payment of debt deriving from financing granted in relation to business in Spain, as well as equity investments in and financing granted to the entities holding these assets.

(g) Amount prior to the deduction of accumulated impairment losses, if any.

(h) Includes real estate assets deriving from financing for real estate construction and property development, regardless of the sector and main economic activity of the company or sole proprietor delivering the asset.

(i) Includes real estate assets not arising from financing for real estate construction and property development or from mortgage-secured financing granted to households for housing purchases.

(j) Includes all equity investments in and financing to entities holding the assets foreclosed or received in payment of debt.

The above tables reflect real estate assets foreclosed or received in payment of debt, other than those referred to in note (a), and classified by the Group on the basis of ultimate purpose, mainly under “Non-current assets held for sale”, “Tangible assets – Investment property” and, to a lesser extent, under “Other assets – Inventories” on the balance sheets at those dates.

4. Financial guarantees received and given in relation to real estate exposure

Details of the value of collateral and guarantees received to ensure collection at 31 December 2020 and 2019, distinguishing between collateral and other guarantees, are provided in the table below. The value is understood as the maximum amount of the guarantee considered, except for non-performing exposures, which take the fair value.

(in thousands of euros)

ITEM	31/12/2020	31/12/2019
Value of collateral	950,628	815,631
Value of other guarantees	-	-
Total	950,628	815,631

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Details of the guarantees given at 31 December 2020 and 2019 related to real estate construction and property development loans, i.e. the amount the Group would have to pay if the guarantee or collateral were enforced, which could exceed the amount recognised under liabilities on the consolidated balance sheet, are as follows:

(in thousands of euros)		
ITEM	31/12/2020	31/12/2019
Financial guarantees given	13,121	12,115
Recognised as liabilities on the consolidated balance sheet	-	-

Appendix X – Refinancing and restructuring transactions and other requirements of Bank of Spain Circular 4/2017

Refinancing and restructuring transactions

As part of its credit risk management policy, the Group has carried out loan refinancing transactions, modifying the original conditions agreed with the borrowers (e.g. interest rate, term, collateral or guarantee).

Loan refinancing and restructuring is designed to match financing to the customers' current ability to meet their payment commitments, affording sufficient financial stability to ensure the continuity and operation of the borrower or its group. A series of measures must be applied that adapt to the source of the problem, be it systemic in nature (the impact is the same across all segments and borrowers) or specific (individual and structural measures for each case).

In this regard, customers are separated into three groups:

- Large corporations and those borrowers that require special treatment (specific analysis on a case-by-case basis).
- SMEs, micro-companies and self-employed professionals, which are offered more standardised products.
- Retail customers.

In general terms, and equally applicable to all the above customer groups, the following key aspects are to be considered:

- Carrying out a diagnostic of the customer's situation: when it is detected or becomes apparent that the customer is having difficulties meeting its obligations with the Entity, it is essential to carry out a detailed analysis drawing on the greatest amount possible of documentation on the situation.
- The non-interruption of arrears of refinancing or restructuring transactions in arrears until, the cure period having expired, it can be verified that the customer is able and willing to meet its obligations as per the forecast repayment schedule.
- Once granted, the decisions taken are reviewed at least annually to ensure the correct functioning of and compliance with the refinancing and restructuring policies.
- Limits to the re-adaptation of transactions. This must be limited to those customers whose situation has changed with respect to the initial adaptation, verifying the feasibility of the transaction over the medium to long term with stable and long-lasting income.
- Possible adaptation of transactions due to legal action, whereby the status of the legal proceedings and the court costs accrued will be taken into account, while ensuring the feasibility of repayment over the medium to long term. Nevertheless, other alternatives could be proposed based on the collateral and income of the claimants.
- Data quality: up-to-date documentary evidence to justify income, payment commitments and the customer's financial situation will be required.
- The minimum track record with the borrower will be assessed, as will evidence of sufficiently extensive compliance and the existence of new collateral and guarantees.
- Exceptions may be made as regards the minimum documentation required for certain customer groups or products.

As regards the accounting treatment of loan restructuring and refinancing, the Group adheres to Bank of Spain Circular 4/2017, which in general is compatible with the guidelines and recommendations of the EBA and the European Central Bank. These criteria set out certain rules for classification at source, as well as general criteria for a restructured or refinanced exposure to be considered cured and, therefore, no longer classified as such.

In 2020, Bank of Spain Circular 3/2020, of 11 June, was published, which amends Circular 4/2017. Following the amendment, loan restructuring or refinancing transactions are no longer considered an automatic classification factor under Stage 2 – Performing exposures under special monitoring, but rather another factor to be considered in the assessment as to whether there has been a significant rise in credit risk since initial recognition.

The Bankia Group has applied this amendment prospectively as a change in the accounting estimates. Failing to apply this amendment would have entailed a rise in the need to recognise impairment on transactions classified under Stage 2 – Performing exposures under special monitoring in an amount of EUR 10 million at 31 December 2020.

A transaction is deemed to be a restructuring or refinancing when:

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- The classification of the modified transaction was Stage 3 – Non-performing exposures just before the modification, or it would be classified as Stage 3 – Non-performing exposures without said modification.
- The modification involves partial derecognition of the debt for reasons such as the recording of debt reductions or write-offs.
- Simultaneously or nearly simultaneously with the granting of additional financing by the Entity, the borrower has made payments of principal and interest on another transaction with it that was classified as Stage 3 - Non-performing exposures or would in the absence of refinancing be classified as Stage 3 - Non-performing exposures.
- The Entity approves the use of implicit restructuring or refinancing clauses in relation to transactions classified as Stage 3 – Non-performing exposures or which would be so classified if such clauses have not been exercised.

Unless there is evidence to the contrary, transactions shall be deemed to be a restructuring or refinancing when:

- Some or all of the payments of the modified transaction have been due for more than 30 days (without being classified as Stage 3 – Non-performing exposures) at least once in the three months preceding its modification, or would be due for more than 30 days without said modification.
- Simultaneously or nearly simultaneously with the granting of additional financing by the Entity, the borrower made payments of principal or interest on another transaction with it, on which some or all of the payments were past due by more than 30 days at least once in the three months prior to the refinancing.
- When the Entity approves the use of embedded restructuring or refinancing clauses in relation to borrowers with outstanding amounts 30 days past due or that would be 30 days past due if such clauses have not been exercised.

The criteria for the classification of refinanced, refinancing or restructured transactions are as follows:

- Insignificant exposures (vis-à-vis retail customers, self-employed customers, micro companies and companies not subject to individual assessment) are classified in accordance with the following variables:

Financial effort	Grace period			2nd Refinancing ⁽²⁾
	<=24 months		>24 months	
	Debt reductions ⁽¹⁾ No	Debt reductions ⁽¹⁾ Yes		
<= 50%	Performing exposures under special monitoring	Non-performing	Non-performing	Non-performing
> 50%	Non-performing	Non-performing	Non-performing	Non-performing

(1) Debt reductions above the percentage of allowances and provisions provided as an alternative solution in article 140 of Annex IX of Circular 4/2017.

(2) It will be classified as Stage 3 – Non-performing exposures if the refinanced transaction was non-performing at the time of the refinancing or if the refinanced transaction was classified as non-performing on initial classification. Otherwise, the classification is based on the result of the general analysis applicable to all refinancing transactions.

When identified as such, if classification of the refinancing and restructuring transactions as Stage 3 – Non-performing exposures is not warranted, they shall be classified as Stage 2 – Performing exposures under special monitoring and, if no significant increase in credit risk has been detected since initial recognition, they will be classified as Stage 1 – Performing exposures.

- For customers assessed individually, classification is based on the result of the analysis, focusing mostly on the ability to pay and also considering grace periods or debt reduction agreements and sustainable debt.

Cure criteria have also been established so that refinanced transactions can change their risk classification, as outlined below.

- Refinanced transactions classified as Stage 3 – Non-performing exposures will remain in this category until all the general criteria for reclassifying transactions out of the Stage 3 – Non-performing exposures category and the specific criteria set out below have been met:

a) That it has been concluded, after an exhaustive review of the borrower's financial situation, that it is not likely to encounter financial difficulties. In this respect, to ensure that there are no indications of financial difficulties, the transactions must meet the following conditions:

- There have been no payments in arrears by more than 30 days in the past year.
- Up to date in payments.
- The customer is not involved in any transactions that are non-performing or in arrears by more than 90 days.
- The borrower is not in litigation or bankruptcy proceedings.

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b) That at least one year has elapsed since the refinancing or restructuring; Specifically, at least one year has elapsed since the last of the following dates:

- The refinancing date.
- The end of the grace period.
- Last date of entry into Stage 3 – Non-performing exposures.

During the probation period described, a new refinancing or restructuring measure granted to refinancing, refinanced or restructured transactions or the existence of amounts more than 30 days past due shall entail the reclassification of these transactions to Stage 3 – Non-performing for reasons other than arrears, provided they were classified as Stage 3 – Non-performing exposures before the commencement of the probation period. The minimum period of one year as regards this last point commences on the date of reclassification of the transaction to Stage 3 – Non-performing exposures.

It will be classified as Stage 3 – Non-performing exposures if the refinanced transaction was non-performing at the time of the refinancing or if the refinanced transaction was classified as non-performing on initial classification. Otherwise, the classification is based on the result of the general analysis applicable to all refinancing transactions.

c) That the borrower has paid the accrued principal and interest instalments, reducing the renegotiated principal, since the later of the date of entry into the restructuring or refinancing transaction or the date of reclassification of the transaction as non-performing. Consequently, the transaction may not present past-due amounts. Additionally, the following shall be necessary:

- that the borrower has settled, by means of regular payments, an amount equivalent to all the amounts, including principal and interest, past due on the date of the restructuring or refinancing transaction, or which were derecognised as a result of it; or
- where more appropriate in view of the transaction characteristics, there are other objective criteria evidencing the borrower's ability to pay. An individual's ability to pay will be deemed to be their sustained payment of the transaction being cured, which is also the case for legal persons for an amount under EUR 300 thousand. For transactions of over EUR 300 thousand involving legal persons, expert analysis will be undertaken by the manager to determine the future sustained payment ability.

d) The borrower does not have any other transactions with amounts more than 90 days past due at the date the refinancing, refinanced or restructured transaction was reclassified to the category of Stage 2 – Performing exposures under special monitoring.

When the transactions meet the above criteria they are no longer classified as Stage 3 – Non-performing exposures and are reclassified to Stage 1 – Performing exposures or Stage 2 – Performing exposures under special monitoring depending on whether there has been a significant increase in credit risk since initial recognition. The reclassification of these loan transactions to a more favourable risk category will continue to be identified as refinancing or restructuring transactions.

- Refinanced or restructured transactions that are not classified to the category Stage 3 – Non-performing exposures shall continue to be identified as such until:

a) That it has been concluded, after an exhaustive review of the borrower's financial situation, that it is not likely to encounter financial difficulties.

In this respect, to ensure that there are no indications of financial difficulties, the transactions must meet the following conditions:

- They are not at monitoring levels 1 or 2 (excluding collective criteria).
- The transactions are not classified as a repeat default or addition (six months or more on the default ladder within the last year with repayment seven days or more past due, except in the event payment has never been more than 30 days past due, in which case it would not be considered a repeat default) to the mortgage portfolio.
- It has not been on the default ladder (from seven to 90 days past due) in the last three months.
- It has not been rated A01 or A02 by the behavioural scoring model.

b) That a minimum of two years has elapsed since the later of the restructuring or refinancing transaction, or the date of reclassification from the category Stage 3 – Non-performing exposures. The dates are therefore as follows:

- The transaction arrangement date.
- The end of the grace period.
- The last date of emergence from non-performing.

c) That the borrower has paid the accrued instalments of principal and interest since the later of the date of entry into the restructuring or refinancing transaction or the date of reclassification from the category of Stage 3 – Non-performing exposures. Additionally, the following shall be necessary:

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- that the borrower has settled, by means of regular payments, an amount equal to all the amounts (principal and interest) that were past due at the date of the restructuring or refinancing transaction or that were derecognised as a result of it. This information will be taken into consideration whenever it is available and may be substituted by expert criteria based on objective facts; or
- where more appropriate in view of the transaction characteristics, there are other objective criteria evidencing the borrower's ability to pay.

Therefore, the existence of contract terms that extend the repayment period, such as grace periods for the principal, will mean that the transaction remains identified as a refinancing or restructuring until the aforementioned criteria have been met. An individual's ability to pay will be deemed to be their sustained payment of the transaction being cured, which is also the case for legal persons for an amount under or equal to EUR 300 thousand. For transactions of over EUR 300 thousand involving legal persons, expert analysis will be undertaken by the manager to determine the future sustained payment ability.

d) That the borrower does not have any other transactions with amounts more than 30 days past due at the end of the probation period.

Once the foregoing requirements are met, the transactions are no longer identified as refinancing or restructuring transactions and are removed from the scope of classification, curing and presentation included in this appendix, irrespective of their monitoring for credit risk management purposes.

As regards the measures granted by the Bankia Group to support families and businesses during the COVID-19 pandemic, public and private moratoriums are granted within the framework of a general programme aimed at borrowers with certain generic characteristics. The decision to apply them is not therefore derived from the assessment of the customer's credit situation and, accordingly, as a general rule, the mere concession thereof does not entail the identification of the transaction as refinanced or restructured, as defined in this Appendix.

In this connection, as a general rule, the granting of public and private moratoriums that comply with the EBA/GL/2020/02 Guidelines does not entail the identification of the transactions as refinanced or restructured, unless the transaction was already identified as refinanced or restructured on the date on which the moratorium was granted.

Once the moratorium has been granted, the Group applies the same criteria contained in the monitoring policies to identify situations where the borrower is showing signs of financial difficulties.

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The table below shows the gross amount of refinancing transactions, with a breakdown of their classification as non-performing exposures, and their respective credit risk allowances and provisions at 31 December 2020 and 2019:

At 31 December 2020

(in thousands of euros)														
	TOTAL							Of which: NON-PERFORMING						
	Without collateral		With collateral			Accumulated impairment losses or accumulated fair value losses due to credit risk	Without collateral		With collateral			Accumulated impairment losses or accumulated fair value losses due to credit risk		
	Number of transactions	Gross carrying amount	Number of transactions	Gross carrying amount	Maximum amount of the collateral		Number of transactions	Gross carrying amount	Number of transactions	Gross carrying amount	Maximum amount of the collateral			
					Real estate collateral						Other collateral		Real estate collateral	Other collateral
Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General government	9	13,215	1,995	30,776	29,895	-	(10,217)	4	8,965	689	12,069	11,614	-	(8,402)
Other financial corporations and sole proprietorships (financial business)	33	494	8	819	704	8	(313)	11	160	7	740	625	8	(284)
Non-financial corporations and sole proprietorships (non-financial business)	6,460	657,848	4,409	1,725,293	1,079,384	88,174	(553,656)	4,261	416,504	2,501	713,807	465,887	69,227	(500,383)
Of which: financing for real estate construction and property development (including land)	2,029	4,971	532	93,414	61,266	4	(37,818)	2,002	4,906	404	64,751	36,908	4	(36,026)
Other households	20,337	241,473	22,940	2,707,057	2,234,780	284	(528,030)	6,163	78,281	13,999	1,662,162	1,344,609	42	(456,774)
Total	26,839	913,030	29,352	4,463,945	3,344,763	88,466	(1,092,216)	10,439	503,910	17,196	2,388,778	1,822,735	69,277	(965,843)
Collective credit loss allowances							(758,528)							
Specific credit loss allowances							(333,688)							
ADDITIONAL INFORMATION														
Financing classified as non-current assets and disposal groups classified as held for sale	-	-	-	-	-	-	-	-	-	-	-	-	-	-

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At 31 December 2019

(in thousands of euros)														
	TOTAL							Of which: NON-PERFORMING						
	Without collateral		With collateral			Accumulated impairment losses or accumulated fair value losses due to credit risk	Without collateral		With collateral			Accumulated impairment losses or accumulated fair value losses due to credit risk		
	Number of transactions	Gross carrying amount	Number of transactions	Gross carrying amount	Maximum amount of the collateral		Number of transactions	Gross carrying amount	Number of transactions	Gross carrying amount	Maximum amount of the collateral			
Real estate collateral					Other collateral						Real estate collateral		Other collateral	
Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General government	13	10,808	2,023	37,341	34,130	-	(10,783)	4	493	1,970	25,624	22,488	-	(10,372)
Other financial corporations and sole proprietorships (financial business)	36	526	10	521	401	9	(197)	17	229	7	372	260	9	(155)
Non-financial corporations and sole proprietorships (non-financial business)	5,930	662,617	5,308	2,480,373	1,179,573	95,465	(856,890)	3,965	375,773	3,083	1,248,421	514,746	78,749	(789,675)
Of which: financing for real estate construction and property development (including land)	1,315	18,805	515	159,273	96,480	727	(61,684)	1,266	16,173	358	113,137	56,313	727	(58,495)
Other households	19,678	197,303	28,096	3,345,317	2,719,315	1,286	(476,043)	8,099	64,854	13,655	1,571,536	1,222,328	352	(416,562)
Total	25,657	871,254	35,437	5,863,552	3,933,419	96,760	(1,343,914)	12,085	441,349	18,715	2,845,953	1,759,822	79,110	(1,216,764)
Collective credit loss allowances							(732,185)							
Specific credit loss allowances							(611,729)							
ADDITIONAL INFORMATION														
Financing classified as non-current assets and disposal groups classified as held for sale	1	21	1,906	244,747	205,737	-	(34,783)	1	21	1,790	230,909	193,985	-	(34,130)

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Movement in 2020 and 2019 was as follows:

(in thousands of euros)		
Item	31/12/2020	31/12/2019
Opening balance	5,390,893	6,727,511
(+) Refinancing and restructuring	657,746	447,236
(-) Repayments, transfers and other changes ⁽¹⁾	(1,648,967)	(1,600,807)
(-) Foreclosures	(61,496)	(88,442)
(-) Disposals (reclassified as written-off assets)	(53,417)	(94,605)
Closing balance (*)	4,284,759	5,390,893

(*) The change in accumulated impairment in 2020 was EUR 251,698 thousand (EUR 788,406 thousand in 2019).

(1) In 2019 transfers to "Disposal groups - Loans and real estate assets" are included.

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Other requirements of Bank of Spain Circular 4/2017

The table below provides information on risk concentration by activity and geographical area. Total activity (a):

At 31 December 2020

(in thousands of euros)					
ITEM	TOTAL	Spain	Rest of the European Union	Americas	Rest of the world
Central banks and credit institutions	21,455,825	13,528,966	4,398,667	77,359	3,450,833
General government	33,026,403	26,927,831	6,037,332	-	61,240
Central government	26,972,656	20,927,098	5,984,318	-	61,240
Other general government	6,053,747	6,000,733	53,014	-	-
Other financial corporations and sole proprietorships (financial business)	24,085,236	22,406,662	283,539	62,615	1,332,420
Non-financial corporations and sole proprietorships (non-financial business) (by purpose)	51,836,876	47,794,692	2,892,729	528,484	620,971
Real estate construction and property development (including land) (b)	2,392,322	2,321,375	34,918	794	35,235
Construction of civil engineering	1,708,280	1,599,271	56,802	24,139	28,068
Other purposes	47,736,274	43,874,046	2,801,009	503,551	557,668
Large corporations (c)	25,395,886	22,522,313	2,126,765	388,070	358,738
SMEs and sole proprietorships (c)	22,340,388	21,351,733	674,244	115,481	198,930
Other households (d) (by purpose) (e)	71,392,567	70,099,213	370,037	102,673	820,644
Housing	61,486,168	60,231,174	359,349	98,890	796,755
Consumer	5,082,317	5,067,034	2,754	1,436	11,093
Other purposes	4,824,082	4,801,005	7,934	2,347	12,796
TOTAL	201,796,907	180,757,364	13,982,304	771,131	6,286,108

(a) For the purposes of this statement, exposures include: loans and advances, debt securities, equity instruments, derivatives (held for trading and hedging), investments in subsidiaries, joint ventures and associates, and guarantees given, irrespective of the balance sheet line item in which they are included, except for "Non-current assets and disposal groups classified as held for sale".

The amount of the assets is the carrying amount of the transactions; i.e. after deducting credit loss allowances for specific transactions.

The amount of guarantees given is their nominal amount.

The breakdown of activity by geographical area is based on the country of residence of the borrowers, the issuers of securities and the counterparties of the derivatives and guarantees given.

(b) This item comprises all activities related to real estate construction and property development, including the financing of land for property development irrespective of the counterparty's sector and main economic activity.

(c) Non-financial corporations are classified as "Large corporations" and "SMEs" in accordance with Commission Recommendation 2003/361/EC, of 6 May 2003, concerning the definition of micro, small and medium-sized enterprises. The activity of sole proprietorships is that performed by natural persons in the course of business.

(d) Households, including non-profit institutions serving households, but excluding business activity of sole proprietorships.

(e) The loans will be classified in accordance with their purpose under the criteria of rule 69.2.e) of Circular 4/2017.

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At 31 December 2019

(in thousands of euros)

ITEM	TOTAL	Spain	Rest of the European Union	Americas	Rest of the world
Central banks and credit institutions	23,381,264	14,958,913	7,961,942	179,548	280,861
General government	30,938,843	26,246,619	4,568,759	904	122,561
Central government	25,569,818	20,920,584	4,568,759	904	79,571
Other general government	5,369,025	5,326,035	-	-	42,990
Other financial corporations and sole proprietorships (financial business)	23,765,882	22,345,612	1,353,549	35,148	31,573
Non-financial corporations and sole proprietorships (non-financial business) (by purpose)	46,012,815	42,789,057	2,594,041	419,425	210,292
Real estate construction and property development (including land) (b)	2,059,474	2,017,745	39,488	2,234	7
Construction of civil engineering	1,711,190	1,553,027	97,170	28,290	32,703
Other purposes	42,242,151	39,218,285	2,457,383	388,901	177,582
Large corporations (c)	23,162,033	21,032,847	1,732,416	265,958	130,812
SMEs and sole proprietorships (c)	19,080,118	18,185,438	724,967	122,943	46,770
Other households (d) (by purpose) (e)	74,484,781	73,122,887	964,570	105,220	292,104
Housing	63,836,929	62,520,655	931,893	100,489	283,892
Consumer	5,547,783	5,529,381	13,973	2,012	2,417
Other purposes	5,100,069	5,072,851	18,704	2,719	5,795
TOTAL	198,583,585	179,463,088	17,442,861	740,245	937,391

(a) For the purposes of this statement, exposures include: loans and advances, debt securities, equity instruments, derivatives (held for trading and hedging), investments in subsidiaries, joint ventures and associates, and guarantees given, irrespective of the balance sheet line item in which they are included, except for "Non-current assets and disposal groups classified as held for sale".

The amount of the assets is the carrying amount of the transactions; i.e. after deducting credit loss allowances for specific transactions.

The amount of guarantees given is their nominal amount.

The breakdown of activity by geographical area is based on the country of residence of the borrowers, the issuers of securities and the counterparties of the derivatives and guarantees given.

(b) This item comprises all activities related to real estate construction and property development, including the financing of land for property development irrespective of the counterparty's sector and main economic activity.

(c) Non-financial corporations are classified as "Large corporations" and "SMEs" in accordance with Commission Recommendation 2003/361/EC, of 6 May 2003, concerning the definition of micro, small and medium-sized enterprises. The activity of sole proprietorships is that performed by natural persons in the course of business.

(d) Households, including non-profit institutions serving households, but excluding business activity of sole proprietorships.

(e) The loans will be classified in accordance with their purpose under the criteria of rule 69.2.e) of Circular 4/2017.

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(in thousands of euros)		31/12/2020											
		Autonomous region											
	TOTAL (*)	Andalusia	Canary Islands	Castile-La Mancha	Castile and Leon	Catalonia	Madrid	Community of Valencia	La Rioja	Murcia	Balearic Islands	Other	
Central banks and credit institutions	13,528,966	371,805	-	-	-	573	11,790,678	204,073	-	-	-	1,161,837	
General government	26,927,831	473,873	329,887	57,535	830,993	266,350	1,902,982	507,732	128,706	39,370	415,992	1,047,313	
Central government	20,927,098	-	-	-	-	-	-	-	-	-	-	-	
Other general government	6,000,733	473,873	329,887	57,535	830,993	266,350	1,902,982	507,732	128,706	39,370	415,992	1,047,313	
Other financial corporations and sole proprietorships (financial business)	22,406,662	18,065	1,734	1,243	2,768	208,069	21,899,144	256,370	256	3,999	1,582	13,432	
Non-financial corporations and sole proprietorships (non-financial business) (by purpose)	47,794,692	3,422,124	1,565,327	1,193,393	1,379,697	5,584,446	19,485,641	5,182,327	346,170	1,844,076	1,682,036	6,109,455	
Real estate construction and property development (including land)	2,321,375	279,686	45,890	114,420	51,785	193,692	1,100,844	265,638	16,610	52,258	62,619	137,933	
Construction of civil engineering	1,599,271	107,210	19,178	24,989	6,371	219,504	920,887	55,009	1,083	10,752	10,730	223,558	
Other purposes	43,874,046	3,035,228	1,500,259	1,053,984	1,321,541	5,171,250	17,463,910	4,861,680	328,477	1,781,066	1,608,687	5,747,964	
Large corporations	22,522,313	916,040	536,326	278,878	350,139	2,635,840	12,157,462	747,582	96,844	576,109	633,053	3,594,040	
SMEs and sole proprietorships	21,351,733	2,119,188	963,933	775,106	971,402	2,535,410	5,306,448	4,114,098	231,633	1,204,957	975,634	2,153,924	
Other households (by purpose)	70,099,213	8,673,633	2,972,901	2,829,373	2,124,342	8,029,886	22,226,308	11,002,056	606,472	4,098,900	3,904,719	3,630,623	
Housing	60,231,174	7,627,215	2,395,922	2,477,916	1,836,265	7,302,988	18,634,221	9,274,444	499,196	3,547,929	3,322,579	3,312,499	
Consumer	5,067,034	483,967	421,133	245,050	190,504	262,917	1,610,734	1,017,912	54,315	298,875	280,682	200,945	
Other purposes	4,801,005	562,451	155,846	106,407	97,573	463,981	1,981,353	709,700	52,961	252,096	301,458	117,179	
TOTAL	180,757,364	12,959,500	4,869,849	4,081,544	4,337,800	14,089,324	77,304,753	17,152,558	1,081,604	5,986,345	6,004,329	11,962,660	

(*) Includes the following consolidated balance sheet items: Deposits in credit institutions, Loans and advances to customers, Debt securities, Equity instruments, Trading derivatives, Hedging derivatives, Equity investments and Contingent exposures. The amounts included in the table are net of impairment losses.

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(in thousands of euros)	31/12/2019											
		Autonomous region										
	TOTAL (*)	Andalusia	Canary Islands	Castile-La Mancha	Castile and Leon	Catalonia	Madrid	Community of Valencia	La Rioja	Murcia	Balearic Islands	Other
Central banks and credit institutions	14,958,913	387,130	-	-	-	570	13,268,396	159,389	-	-	-	1,143,428
General government	26,246,619	392,370	16,366	48,685	656,697	345,786	1,887,209	414,237	101,181	53,549	341,109	1,068,846
Central government	20,920,584	-	-	-	-	-	-	-	-	-	-	-
Other general government	5,326,035	392,370	16,366	48,685	656,697	345,786	1,887,209	414,237	101,181	53,549	341,109	1,068,846
Other financial corporations and sole proprietorships (financial business)	22,345,612	19,451	1,452	1,013	2,516	43,998	22,002,504	258,520	294	3,836	3,923	8,105
Non-financial corporations and sole proprietorships (non-financial business) (by purpose)	42,789,057	3,313,824	1,372,354	1,022,363	1,239,161	5,248,226	16,656,714	4,762,849	346,035	1,674,918	1,388,799	5,763,814
Real estate construction and property development (including land)	2,017,745	246,704	49,301	69,404	45,582	177,324	891,290	260,702	18,111	59,839	69,056	130,432
Construction of civil engineering	1,553,027	242,387	11,653	32,699	5,416	252,058	709,676	53,295	1,519	9,045	11,154	224,125
Other purposes	39,218,285	2,824,733	1,311,400	920,260	1,188,163	4,818,844	15,055,748	4,448,852	326,405	1,606,034	1,308,589	5,409,257
Large corporations	21,032,847	873,560	474,427	233,601	318,939	2,569,517	10,675,261	1,326,314	89,309	516,486	445,287	3,510,146
SMEs and sole proprietorships	18,185,438	1,951,173	836,973	686,659	869,224	2,249,327	4,380,487	3,122,538	237,096	1,089,548	863,302	1,899,111
Other households (by purpose)	73,122,887	9,102,716	3,095,025	2,971,991	2,233,923	8,224,365	23,251,059	11,500,673	638,840	4,292,705	4,029,639	3,781,951
Housing	62,520,655	7,957,679	2,469,008	2,601,268	1,920,791	7,458,702	19,432,912	9,636,041	523,499	3,694,515	3,388,625	3,437,615
Consumer	5,529,381	508,339	461,931	263,775	204,696	289,976	1,818,852	1,107,023	58,334	303,773	291,037	221,645
Other purposes	5,072,851	636,698	164,086	106,948	108,436	475,687	1,999,295	757,609	57,007	294,417	349,977	122,691
TOTAL	179,463,088	13,215,491	4,485,197	4,044,052	4,132,297	13,862,945	77,065,882	17,095,668	1,086,350	6,025,008	5,763,470	11,766,144

(*) Includes the following consolidated balance sheet items: Deposits in credit institutions, Loans and advances to customers, Debt securities, Equity instruments, Trading derivatives, Hedging derivatives, Equity investments and Contingent exposures. The amounts included in the table are net of impairment losses.

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(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

The following table shows the total amount of secured financing in terms of the carrying amount of the financing as a percentage of the latest available appraisal or valuation of the guarantee or collateral (loan-to-value) at 31 December 2020 and 2019 (a):

At 31 December 2020

(in thousands of euros)								
ITEM	TOTAL	Of which: real estate collateral (b)	Of which: other collateral (b)	Secured loans. Carrying amount as % of latest available appraisal value (loan-to-value) (c)				
				Less than or equal to 40%	More than 40% and less than or equal to 60%	More than 60% and less than or equal to 80%	More than 80% and less than or equal to 100%	More than 100%
General government	5,624,886	163,714	71,547	40,125	82,636	50,470	48,309	13,721
Other financial corporations and sole proprietorships (financial business)	1,667,865	87,142	271,624	119,239	79,272	18,951	3,702	137,602
Non-financial corporations and sole proprietorships (non-financial business) (by purpose)	41,466,909	7,141,673	4,336,354	3,854,800	2,281,516	1,279,146	361,201	3,701,364
Real estate construction and property development (including land)	903,851	693,186	74,855	217,421	226,049	85,770	87,906	150,895
Construction of civil engineering	500,613	35,332	429,046	42,864	1,770	1,737	29,662	388,345
Other purposes	40,062,445	6,413,155	3,832,453	3,594,515	2,053,697	1,191,639	243,633	3,162,124
Large corporations (d)	20,406,442	957,072	3,316,515	972,874	340,335	252,770	27,368	2,680,240
SMEs and sole proprietorships (d)	19,656,003	5,456,083	515,938	2,621,641	1,713,362	938,869	216,265	481,884
Other households (e) (by purpose) (f)	71,218,280	63,950,084	51,576	17,852,330	23,073,413	16,288,887	3,154,901	3,632,129
Housing	61,486,168	61,307,625	1,856	16,879,991	22,250,625	15,859,255	3,022,851	3,296,759
Consumer	5,082,317	102,507	6,903	46,919	22,018	12,483	4,100	23,890
Other purposes	4,649,795	2,539,952	42,817	925,420	800,770	417,149	127,950	311,480
TOTAL	119,977,940	71,342,613	4,731,101	21,866,494	25,516,837	17,637,454	3,568,113	7,484,816
MEMORANDUM ITEM								
Refinancing, refinanced and restructured transactions	4,284,636	3,316,448	486,052	927,932	841,029	756,886	382,554	894,099

- (a) The definition of loans to customers is that used to prepare the balance sheet. Includes all transactions of this nature, regardless of the heading under which they are presented on the balance sheet, except for in "Non-current assets and disposal groups classified as held for sale". The amounts shown reflect the carrying amount of the exposures; i.e. after deducting credit loss allowances for specific transactions.
- (b) Includes the carrying amount of all transactions secured by real estate or other collateral, regardless of their loan-to-value ratio or legal form (e.g. mortgage, finance lease, reverse repurchase agreement).
- (c) The loan-to-value ratio is obtained by dividing the carrying amount of each exposure at the reporting date by the latest available appraisal or valuation of the collateral.
- (d) Non-financial corporations are classified as "Large corporations" and "SMEs" in accordance with Commission Recommendation 2003/361/EC, of 6 May 2003, concerning the definition of micro, small and medium-sized enterprises. The activity of sole proprietorships is that performed by natural persons in the course of business.
- (e) Households, including non-profit institutions serving households, but excluding business activity of sole proprietorships.
- (f) The loans will be classified in accordance with their purpose under the criteria of rule 69.2.e).

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(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

At 31 December 2019

(in thousands of euros)

ITEM	TOTAL	Of which: real estate collateral (b)	Of which: other collateral (b)	Secured loans. Carrying amount as % of latest available appraisal value (loan-to-value) (c)				
				Less than or equal to 40%	More than 40% and less than or equal to 60%	More than 60% and less than or equal to 80%	More than 80% and less than or equal to 100%	More than 100%
General government	4,842,252	177,568	112,568	57,164	113,005	46,753	63,003	10,211
Other financial corporations and sole proprietorships (financial business)	1,215,223	87,680	38,321	30,704	34,417	8,018	3,073	49,789
Non-financial corporations and sole proprietorships (non-financial business) (by purpose)	36,134,230	7,312,792	4,904,309	4,288,702	2,518,169	1,296,296	355,888	3,758,046
Real estate construction and property development (including land)	719,293	522,552	107,950	287,584	173,679	91,754	33,354	44,131
Construction of civil engineering	620,296	69,025	510,999	217,955	180,085	102,719	18,120	61,145
Other purposes	34,794,641	6,721,215	4,285,360	3,783,163	2,164,405	1,101,823	304,414	3,652,770
Large corporations (d)	17,583,141	1,171,612	3,662,485	1,074,901	450,808	255,840	38,263	3,014,285
SMEs and sole proprietorships (d)	17,211,500	5,549,603	622,875	2,708,262	1,713,597	845,983	266,151	638,485
Other households (e) (by purpose) (f)	74,307,893	66,160,364	65,663	17,819,491	23,587,817	17,118,300	3,643,095	4,057,324
Housing	63,836,929	63,348,461	3,783	16,757,648	22,765,278	16,704,303	3,442,355	3,682,660
Consumer	5,547,783	116,114	8,910	47,536	29,958	14,072	5,321	28,137
Other purposes	4,923,181	2,695,789	52,970	1,014,307	792,581	399,925	195,419	346,527
TOTAL	116,499,598	73,738,404	5,120,861	22,196,061	26,253,408	18,469,367	4,065,059	7,875,370
MEMORANDUM ITEM								
Refinancing, refinanced and restructured transactions	5,390,892	4,667,829	318,663	948,865	1,146,141	1,192,721	683,036	1,015,729

- (a) The definition of loans to customers is that used to prepare the balance sheet. Includes all transactions of this nature, regardless of the heading under which they are presented on the balance sheet, except for in "Non-current assets and disposal groups classified as held for sale". The amounts shown reflect the carrying amount of the exposures; i.e. after deducting credit loss allowances for specific transactions.
- (b) Includes the carrying amount of all transactions secured by real estate or other collateral, regardless of their loan-to-value ratio or legal form (e.g. mortgage, finance lease, reverse repurchase agreement).
- (c) The loan-to-value ratio is obtained by dividing the carrying amount of each exposure at the reporting date by the latest available appraisal or valuation of the collateral.
- (d) Non-financial corporations are classified as "Large corporations" and "SMEs" in accordance with Commission Recommendation 2003/361/EC, of 6 May 2003, concerning the definition of micro, small and medium-sized enterprises. The activity of sole proprietorships is that performed by natural persons in the course of business.
- (e) Households, including non-profit institutions serving households, but excluding business activity of sole proprietorships.
- (f) The loans will be classified in accordance with their purpose under the criteria of rule 69.2.e).

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Appendix XI – Details of agents and disclosures required by Article 21 of Royal Decree 84/2015, of 13 February

Information at 31 December 2020

Bankia, S.A. agents authorised to enter into and/or negotiate transactions on behalf of the Entity (under Bank of Spain Circular 4/2010, rule 1, section 1)	
Name	Registered office
MAPFRE	CARRETERA MAJAHONDA, 52-MAJADAHONDA (MADRID)
ASESORAMIENTO FINANCIERO Y PATRIMONIAL S.L.	C/ ORENSE, 32-MADRID

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Bankia, S.A. agents authorised only to market products and services; not authorised to enter into and/or negotiate transactions on behalf of the Entity (under Bank of Spain Circular 4/2010, rule 1, section 2)	
Name	Registered office
MARTORELL Y CANTACORPS SL	AV. CATALUNYA, 64-CERDANYOLA DEL VALLES (BARCELONA)
VALIA INVEST FAMILY OFFICE ,S.L.	C/ VELAZQUEZ, 86-MADRID
ESF CONSULTORES 2010 SL	C/ANTONIO BELON, 1 -MARBELLA (MALAGA)
SOMOS FINANCIEROS SL	AV. M 40, 17-ALCORCON (MADRID)
INNOSUNS COACHING & CAPITAL S.L.	C/ FELIPE IV, 3-MADRID
IDF ALL FINANCING SL	C/ JESUS APRENDIZ, 23-MADRID
INVERSIONES CONFIDENCE CAPITAL, SL	C/ GENERAL ARRANDO, 12-MADRID
INVERSIONES PEIX S.L.	C/ SANT ELIES, 9 DESPATX 95-BARCELONA
CESIONES Y TASACIONES FARMARCEUTICAS SL	AV. MARQUES DE SOTEL 5 P 20, 5-VALENCIA
FERNANDO HERRERIAS MIERA	C/ LUIS MARTINEZ, 27-SANTANDER
GREENB3E S.L.	C/ MISER MASCO, 42-VALENCIA
JORDI OLIVA PRIM	C/ PEDRO I PONS, 12-BARCELONA
ALTRIA CORPO & INVEST SERVICES SLU	TRAVESSERA DE GRACIA 15 BARCELONA 08021-BARCELONA
AYUDA T UN LUGAR TODAS LAS SOLUCIONES S.L.	AV. ISAAC NEWTON POL SALINAS, 287-PUERTO DE SANTA MARIA (CADIZ)
OSCAR ROS CUÑAT - VALFARMA	C/ 25 DE ABRIL, 23-RAFELBUNYOL (VALENCIA)
TAICOM TECNOLOGIA Y SERVICIOS SL.	AV DE MADRID 95 -BARCELONA
ASESOC SERV INTEGRALES S.L.	GUELL 42 VILABLAIREIX-GIRONA
PROFESIONAL AND LEGAL SOLUTIONS S.L.	DOCTOR MECA 107 -MAZARRON (MURCIA)
SERVEIS ADMINISTRATIUS BAIX CAMP, S.L.	MISERICORDIA 5 REUS-REUS (TARRAGONA)
CEOFARMA SLU	PZ L' AJUNTAMENT 2 -VALENCIA
TU SOLUCION HIPOTECARIA	C/ TORRES, 26-BARCELONA
AGENCIA MEDITERRANEA	C/ COLON, 18-VALENCIA
AFINANCE FINANCIAL CONSULTING, S.L	PASEO DE GRACIA, 85-BARCELONA
GARANTIA FINANCIERA SL.	BULGARIA 4 -MADRID
TRAMITA LEVANTE VALENCIA SL	MESTRE RACIONAL 11 -VALENCIA
GRUPO FINANCIERO 10, SL	C/ ECHEGARAY, 6-MADRID
EL IDEALISTA CREDITO Y FINANCIACION SL	C/ CEDACEROS, 11-MADRID
RASTREATOR COMPARADOR CORREDURÍA DE SEGUROS, S.L.U.,	C/ SANCHEZ PACHECO, 85-MADRID
HELLOHIPOTECA SL	C/ SERRANO, 8-MADRID
HIPOO DIGITAL LOANS.L.	C/ MARIA DE MOLINA, 1-MADRID
IAHORRO BUSSINES SOLUTIONS S.L.U.,	C/ GENERAL RAMIREZ DE MADRID, 8-MADRID
CLABERE NEGOCIOS S.L. CREDIMARKET	PLAZA AUSIAS MARCH, 1-SAN CUGAT DEL VALLES (BARCELONA)
CRUVERSAN SOLUCIONES, SL IBERCREDIT	C/ DOCTOR ESQUERDO, 184-MADRID
HIPOTECA PRIMERO, S.L.	C/ AGUARON, 27-MADRID
FINTECA TECH SL	C/ PAU VILA, 1-BARCELONA
FRESH LIVING GROUP SL TRIOTECA	C/ BADAJOZ 127 NAVE 3-BARCELONA
GASCON BERNABEU SL	C/ DESIDERIO RODRIGUEZ, 19 -TORREVIEJA (ALICANTE)
JCG ALLFINANZ MALLORCA SLU	C/ TAMONER, 1, 2º -PALMA DE MALLORCA
DANIEL DA CONCEI AO PIRES	C/ FONT I MONTEROS, 6-PALMA DE MALLORCA
SPANISH BEST HOMES 2010 SL	AV. REYES CATOLICOS, 39-MAZARRON (MURCIA)
SKANDINAVISKA SOLFASTIGHETER, S.L.	RAMON GALLUD 39 -TORREVIEJA
FASTIGHETSBYRAN TORREVIEJA SL	TRITON CC TORREMARINA 8-TORREVIEJA
HOME FINANCE SPAIN S.L.	C/ MAESTRO TORRALBA 21 -ORIHUELA COSTA

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FLUENT FINANCE ABROAD S.L.	C/ MARQUES DEL DUERO, 76, 3º C -SAN PEDRO DE ALCANTARA (MALAGA)
EASYADS SL	C/ MAESTRO TORRALBA, 4-MURCIA
FIRST CAPITAL SOLUTIONS SL	AV. RICARDO SORIANO, 65-MARBELLA (MALAGA)
ILLESLEX, S.L.	C/ OMS 50-PALMA MALLORCA
NICOLA KATE BUCHANAN	C/ SANT FELIU, 4 1º -PALMA DE MALLORCA
PLATINUM SPAIN SL	C/ PAIS VASCO 1-OJEN (MALAGA)
BETTINA ELISABETH LORENZ	C/ ARPELLA, 32-SANT JORDI DE SES SALINES (BALEARES)
SEIFERT INVEST SLU	C/ CAMAMILLA Nº 3 ESC. A 2º A-PALMA DE MALLORCA
THE RESORTS OF THE WORLD COMPANY SL	C/ ALARCE, 26-TORRE PACHECO (MURCIA)
KARL JOHN QUANE	C/ DE LA IGLESIA 3-MARBELLA
DAVID GRONDONA OAKES	AV. PUIG DE SARAGOSSA 1 B-SANTA PONÇA (ILLES BALEARS)
GOLF PROPERTY STORE S.L.	C/ RASPALLON, 3-ROLDAN (MURCIA)
TIMOTHY FRENCH	C/ MAR ROJO, 13-TORREVIEJA (ALICANTE)
MORTGAGE DIRECT S.L.	C/ CARRER DELS CAVALLERS, 37 -VALENCIA
RAPIDO FINANCE & LEGAL S.L.	C/ JAEN, 4-SAN PEDRO DE ALCANTARA (MALAGA)
SERVICIOS INMOBILIARIOS MENORCA FARO SL	AV. JOSEP ANSEL CLAVE, 38-MAHON (BALEARES)
PERSONAL PROPERTY CONSULT, S.L	C/ GRAN PUIG DES CASTELLET, 1 -SANTA PONÇA (BALEARES)
POLLENSA INVEST SL	C/ CARRER ROSER VELL, 38-POLLENÇA (BALEARES)
THIMOTHY DYER	C/ RIO GUADALQUIVIR, 10-SAN JAVIER (MURCIA)
LAW HAWKS S.L.	C/ JUAN RAMOS JIMENEZ, 10-MARBELLA (MALAGA)
LA ZENIA LEGAL ADVICE S.L.	C/ MALAQUITA LA ZENIA-ORIHUELA (ALICANTE)
LIONSGATE CAPITAL S.L.	PASEO DEL BORNE, 17-PALMA DE MALLORCA (ILLES BALEARS)
ROCIO LUNA DE TOLEDO	C/ ANACARDO, 45-TORREPACHECO (MURCIA)
DR. STIFF BERATUNGS GMBH	C/ CATALUNYA, 5-PALMA DE MALLORCA (ILLES BALEARS)
MARIA FUENSANTA VIDAL LUCAS	C/ CUEVAS DEL BUITRE 13-SANGONERA VERDE (MURCIA)
BLUE MED INVEST S.L.	C/ GALERA 16 -MAZARRON (MURCIA)
ALISON JUDITH LOWTHER DE COTTA	C/ JUAN RAMON JIMENEZ 10-MARBELLA
INDEPENDENT SPANISH MORTGAGES-BROKERS S.L.	URB. AZALEA BEACH, CONJ. EL RÍO, CASA 77 -MALAGA
NARCISO LOPEZ LOPEZ	C/ ALAMEDA 58-AGUILAS (MURCIA)
BONILLO SL	PASEO DEL ALTILLO 6-ALMUÑECAR(GRANADA)
MICHAEL ROBERT BARKESS	URB LA CARTUJA DEL GOLF 20-ESTEPONA
LOANISSIMO SL BANK OF SPAIN	C/ JOAQUIN RODRIGO 6-ALFAZ DEL PI (ALICANTE)
GRIMANGA S.A.	AVENIDA DE FILIPINAS 42-CARTAGENA
CHRISTOPHER PHILIP MCNAMARA	C/ PABLO NERUDA 2-ROJALES (ALICANTE)
GESTION INMOBILI. INT, MARE NOSTRUM SL	C/ COLON 64-DENIA (ALICANTE)
ALBERTO LUIS ALCARAZ ABELLAN	C/ JOSE VALERA ROMERO 2-MURCIA
JANE LEES -OLIVACASAS	C/ MAYOR 6-OLIVA (VALENCIA)
ENGEL MALLORCA INVEST SL	C/ ISAAC PERAL 50-ANDRAITX
MARIA TERESA VELASCO GOMEZ	C/ ARCO DEL TEATRO-ALMUÑECAR(GRANADA)
GRUPO PLATINUM ESTATES S.L.	C/MAR RABIOSA 1-SAN JUAN TERREROS (ALMERIA)
CUENCA Y ASOCIADOS S.L.	AV RONDA NORTE 1-MURCIA
NAVIGATOR NORTH SL	C/ LA SAL 21-TORREVIEJA
SEINSA COSTA BLANCA SL	C/ DEL MAR 39-LOS MONTESINOS (ALICANTE)
K7 GRUPO INMOBILIARIO S.L.	PASEO DEL MEDITERRANEO 201-MOJACAR (ALMERIA)
SPANISH PROPERTY CHOICE S.L.	PASEO DEL MEDITERRANEO 363-MOJACAR (ALMERIA)
SERGIO SANCHEZ ARCOS	C/ FRANCIA 3 -BENIDORM

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CHILDS DOS SANTOS SL - VERITAS HOMES	PASEO DEL MEDITERRANEO 355-MOJACAR (ALMERIA)
COSTA INVEST S.L.	C/ SALVADOR DALI 20-ORIHUELA COSTA
VIP ALMERIA S.L.	PASEO DEL MEDITERRANEO 22-MOJACAR (ALMERIA)
PRODDIGIA S.L.	AVENIDA DIAGONAL 361 -BARCELONA
ERWIN CLAASEN - MY HOME COSTA BRAVA	PASEO CAMPRODON I ARRETA 39-GIRONA
TERESA SANCHEZ TELLO - INMOBILIARIA TOSCANA	C/ EUCALIPTO 1-LA HERRADURA (GRANADA)
SANCHEZ SOLICITORS S.L.	C/ DIPUTACION PROVINCIAL 9-NERJA (MALAGA)
FERCO GESTION S.L.	C/ PARIS 206 -BARCELONA
LANZAROTE INVESTMENTS REAL ESTATE SL	AV LAS PLAYAS 43 -PUERTO DEL CARMEN (LAS PALMAS)

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Appendix XII - Annual banking report

On 27 June 2014, Law 10/2014, of 26 June, on the organisation, supervision and solvency of credit institutions, was published in the Official State Gazette ("BOE"). This legislation transposes into Spanish Law Article 89 of Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms, amending Directive 2002/87/EC (CRD IV) and repealing Directives 2006/48/EC and 2006/49/EC.

In compliance with Article 87 and transitional provision twelve of Law 10/2014, credit institutions are required to disclose annually, specifying by country in which they have an establishment, the following information on a consolidated basis for the latest financial year closed:

- a) Name(s), nature of activities and geographical location.
- b) Turnover and number of employees on a full time equivalent basis.
- c) Profit or loss before tax and tax on profit or loss.
- d) Public subsidies received.

Pursuant to the foregoing, the aforementioned required information is detailed below:

a) Name(s), nature of activities and geographical location

Bankia, S.A. is a private-law entity subject to the legislation and regulations for banks operating in Spain. Its registered office is at calle Pintor Sorolla, 8, Valencia. Bankia's bylaws may be consulted, together with other relevant legal information, at its registered office and on its website.

Bankia's bylaws stipulate the activities it may engage in, which are those commonly carried out by credit institutions and, in particular, meet the requirements of Law 26/1988, of 29 July, on discipline and intervention in credit institutions.

It is filed at the Mercantile Registry of Valencia in Volume 9,341, Book 6,623, Page 104, Sheet V-17274, entry 183, and in the Bank of Spain's Register of Banks and Bankers with number 2038.

Its tax identification number (NIF) is A-14010342.

In addition to its direct operations, Bankia is a subsidiary and forms part of Grupo BFA, Tenedora de Acciones, and is also the parent of a business group. At 31 December 2020, this consolidated group encompassed 63 companies, including subsidiaries, associates and joint ventures. These companies engage in a range of activities, including insurance, asset management, financing, services and property management.

The Group mainly conducts its business in Spain. Appendices II, III and IV provide details of the companies operating in each jurisdiction, including their name, geographical location and the nature their activity.

b) Turnover and number of employees on a full time equivalent basis

This section provides details of turnover and the number of full-time employees at the 2020 and 2019 reporting dates, by country and on a consolidated basis. Turnover is considered to be the gross income, as presented in the Group's consolidated income statements for 2020 and 2019:

(in thousands of euros)				
	Turnover		Number of full-time employees	
	31/12/2020	31/12/2019	31/12/2020	31/12/2019
Spain	3,088,423	3,244,405	15,942	16,029
Other countries	-	625	8	6
TOTAL	3,088,423	3,245,030	15,950	16,035

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

c) Profit or loss before tax and tax on profit or loss

This section presents the profit or loss before tax and the tax on profit or loss, as reflected in the Group's consolidated income statement, at the 2020 and 2019 reporting dates:

(in thousands of euros)				
	Profit or loss before tax		Tax on profit or loss	
	31/12/2020	31/12/2019	31/12/2020	31/12/2019
Spain	311,500	753,744	(81,470)	(213,112)
Other countries	(7)	1,946	(1)	(289)
TOTAL	311,493	755,690	(81,471)	(213,401)

d) Public subsidies received

See Note 1.2 on the BFA-Bankia Group's Restructuring Plan.

The 2020 Directors' Report presents the Group's key indicators and ratios. The return on assets for 2020, calculated as net profit as a percentage of the total balance, was 0.11% (0.26% in 2019).

Appendix XIII – Other information

Customer Service Department

The Bank has in place the "Customer Protection Regulations of Bankia, S.A. and its Group", approved by the Board of Directors. Among other aspects, the Regulations stipulate that Bankia, S.A.'s Customer Service Department must address and resolve any complaints or claims submitted by those in receipt of financial services from any of the Bankia Group financial companies – one of which is the Bank – covered by the scope of the service (Bankia, S.A. and Group entities subject to Ministry of Economy Order ECO/734/2004 of 11 March on Customer Service Departments and the Financial Institution Ombudsman).

Pursuant to Order ECO/734/2004 of 11 March on Customer Service Departments and the Financial Institution Ombudsman, the following Bankia Group entities are subject to the obligations and duties stipulated in the Order in this connection, with claim procedures and solutions being centralised through Bankia, S.A.'s Customer Service Department:

Company
Bankia, S.A.
Bankia Fondos, S.G.I.I.C., S.A.
Bankia Pensiones, S.A., E.G.F.P.
Segurbankia, S.A., Correduría de Seguros del Grupo Bankia

The Bankia Group fulfils these obligations and duties in accordance with Law 44/2002, of 22 November, on Financial System Reform Measures, and with Ministry of Economy Order ECO/734/2004, of 11 March, on Customer Service Departments and the Financial Institution Ombudsman.

The main data on claims submitted in 2020 and 2019 by customers of the Group entities subject to these duties and obligations are as follows:

31/12/2020

Company	Received	Number of claims				
		Admitted for processing	Dismissed ⁽¹⁾	Resolved against the customer	Resolved in favour of the customer	Resolved informing the customer
Bankia, S.A.	90,643	87,261	3,382	25,869	40,682	13,199
Bankia Fondos, S.G.I.I.C., S.A.	6	6	-	6	1	-
Bankia Pensiones, S.A., E.G.F.P.	79	76	3	39	4	26
Segurbankia, S.A.	-	-	-	-	-	-

(1) Refers to claims submitted in 2020.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

31/12/2019

Company	Received	Number of claims				
		Admitted for processing	Dismissed ⁽¹⁾	Resolved against the customer	Resolved in favour of the customer	Resolved informing the customer
Bankia, S.A.	43,037	41,139	1,898	14,811	16,740	9,651
Bankia Fondos, S.G.I.I.C., S.A.	54	51	3	30	5	15
Bankia Pensiones, S.A., E.G.F.P.	115	114	1	71	11	42
Segurbankia, S.A.	-	-	-	-	-	-

(1) Refers to claims submitted in 2019.

Details, by type, of all claims resolved in 2020 and 2019 are as follows:

Type of claim	Number of claims	
	31/12/2020	31/12/2019
Asset transactions	12,675	10,400
Liability transactions	42,556	15,639
Other banking products	60	107
Collection and payment services	15,472	8,671
Investment services	654	577
Insurance and pension funds	934	862
Other	7,475	5,120
Total (*)	79,826	41,376

(*) Not including those dismissed.

Lastly, the claims pending resolution by the Group entities subject to these obligations at 31 December 2020 and 2019 are as follows:

Company	Number of claims	
	31/12/2020	31/12/2019
Bankia, S.A.	8,916	1,402
Bankia Fondos, S.G.I.I.C., S.A.	-	7
Bankia Pensiones, S.A., E.G.F.P.	12	12

Average supplier payment period. "Reporting requirement", additional provision three of Law 15/2010, of 5 July

Pursuant to Law 15/2010, of 5 July, which amends Law 3/2004, of 29 December, containing measures to combat late payments in commercial transactions, as developed by the Spanish Accounting and Auditing Institute (ICAC) Resolution of 29 January 2016 on disclosures in the notes to the financial statements on the average payment period for suppliers in commercial transactions, the following disclosures are made:

- Due to the nature of Bankia's business (mainly financial activities), the information provided in this Note concerning late payments exclusively concerns payments to suppliers for the provision of various services and supplies to Bankia, other than payments to depositors and holding companies of securities issued by the Bank, which were made, in all cases, in strict compliance with the contractual and legal periods established in each case, irrespective of whether or not they were payable on demand or in instalments. Moreover, no information is provided concerning payments to suppliers excluded from the scope of this reporting requirement pursuant to the provisions of the aforementioned ICAC Resolution, such as suppliers of fixed assets that are not considered to be trade creditors.

BANKIA FINANCIAL STATEMENTS 2020 BANKIA GROUP

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

- At 31 December 2020 and 2019, the information required by Law 15/2010, of 5 July, in relation to the Group's trade suppliers and service providers, in due consideration of Article 6 of the ICAC Resolution of 29 January 2016 and the scope defined in the preceding paragraph, is as follows:

(days)		
ITEM	2020	2019
Transactions paid ratio	9.33	9.35
Transactions payable ratio	12.46	14.77
Average supplier payment period	9.39	9.44

(in thousands of euros)		
ITEM	2020	2019
Total payments made	811,980	828,797
Total payments outstanding	14,033	14,116

Payments in respect of payables and receivables between Spanish entities of the Bankia Group have been excluded from the above data.



**BANKIA, S.A. AND SUBSIDIARIES
COMPOSING THE BANKIA GROUP**

DIRECTORS' REPORT

DECEMBER 2020

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1.- KEY EVENTS OF 2020

1.1.- Joint merger plan between CaixaBank and Bankia

As indicated in Note 1.17 to the Bankia Group's annual accounts for the year ended 31 December 2020, on 18 September 2020 Bankia publicly announced, via notification of insider information to the Spanish National Securities Market Commission (CNMV), that the Boards of Directors of Bankia, S.A. and CaixaBank, S.A. had drafted and signed a joint plan for the merger by absorption of Bankia, S.A. by CaixaBank, S.A. (hereinafter the "Merger Plan").

The exchange ratio for the Merger Plan, which was determined on the basis of the actual value of the net assets of both entities and following the pertinent reviews and valuations, is 0.6845 newly issued shares of CaixaBank, with the same characteristics and with the same rights as the existing CaixaBank shares at the date of their issue and with no supplementary cash consideration, for each share of Bankia, of EUR 1 par value each, including a premium of 20% on the exchange ratio at 3 September 2020, prior to informing the market of negotiations regarding the merger.

CaixaBank will cover the exchange of Bankia shares through newly issued ordinary shares of CaixaBank. Bearing in mind the total number of Bankia shares outstanding at the date of the Merger Plan that could potentially be exchanged (3,069,522,105 shares of EUR 1 par value each, less 31,963,300 treasury shares which will be retained by Bankia until the merger is closed and thus not included in the exchange), CaixaBank will have to issue a maximum of 2,079,209,002 ordinary CaixaBank shares of 1 EUR par value each to cover the exchange ratio, which represents a capital increase for a total nominal amount of EUR 2,079,209,002. The amount of the capital increase could be scaled back depending on Bankia's treasury shares and the number of Bankia shares held by CaixaBank at the date the merger is closed.

The exchange ratio implies that the CaixaBank shareholders will initially represent 74.2% of the share capital of the new entity, whereas Bankia shareholders will represent 25.8%. CriteriaCaixa, an entity wholly owned by Fundación Bancaria "la Caixa", will remain the reference shareholder of CaixaBank, holding around 30% of share capital, whereas the Fund for Orderly Bank Restructuring (FROB) will hold 16.1%.

José Ignacio Goirigolzarri will be the executive chairman of the entity, while Gonzalo Gortázar will hold the position of chief executive officer. The Board of Directors will comprise 15 members, of which 60% will be independent directors. Women will make up 33% of board members.

The merger was approved at the extraordinary general meetings of Bankia, S.A. and CaixaBank, S.A. held on 1 December 2020 and 3 December 2020, respectively.

1.2.- Pandemic triggered by COVID-19

In 2020, we have been witness to the sudden emergence of the pandemic caused by COVID-19, which has forced governments to adopt measures that affect normal production activity, consumer spending and, consequently, the economy as a whole. This scenario has precipitated a global economic slowdown that has impacted the results, targets and financial position of companies and financial institutions. Section 2 of this report includes specific information on the impact that COVID-19 has had on the Bankia Group in 2020, as well as the measures adopted by the entity to mitigate the effects of the pandemic and the expected future impact on the results and financial position of the Group.

1.3.- Evolution of earnings, activity and the financial position of the Group

- The Group ended 2020 with **profit attributable** to the Parent (hereinafter "attributable profit") of EUR 230 million, down EUR 312 million (-57.6%) on 2019, due substantially to the provisions of EUR 505 million recognised during the year to cover the future impact caused by the deteriorating macroeconomic scenario in the wake of COVID-19.

- **Loans and advances to customers** were up by 3% to stand at EUR 120,994 million. This growth is concentrated in the corporate segment and reflects the higher drawdowns of financing facilities and the new loans with a public guarantee extended to ensure the liquidity and working capital needs of the self-employed, SMEs and companies.
- **In terms of customer funds**, customer deposits grew by EUR 3,675 million (+2.9%) as a result of the higher savings rate of individuals and the liquid assets deposited by companies since the onset of the pandemic. Off-balance sheet customers funds rose by EUR 1,510 million over the year (+5.5%), especially investment funds, which grew by 6.6% thanks to the recovery in business volumes following the initial impact of COVID-19 during the first quarter of the year.
- The Group's **non-performing exposures** were down by 3.9% in the year to stand at EUR 6,213 million at the December 2020 close. The **NPL ratio** was 4.7%, down by 0.3 percentage points on where it stood in December 2019. This trend in non-performing assets is due to the growth in lending and the risk management activities performed during the year, which included control and follow-up measures to anticipate potential impacts on the loan portfolio as a result of COVID-19.
- The Group continues to hold a **robust liquidity position** which is reflected in its LCR ratio of 195.22% and liquid assets amounting to EUR 35,048 million, which would enable it to cover debt maturities by a ratio of 1.6x. At the end of 2020 the amount drawn down on the TLTRO III facility stood at EUR 22,919 million after the drawdown in the second quarter of the year within the framework of the measures implemented by the ECB to mitigate the effects of the COVID-19 crisis. The Group's LTD ratio (Loan to Deposits) stood at 91.3% at year end, a year-on-year increase of 0.3 percentage points which reflects the growth in ICO-backed loans to companies.
- In terms of **solvency**, Bankia's Phase-In CET1 ratio at the end of 2020 stood at 17.30%, while the Total Capital ratio stood at 22.01%, comfortably meeting the European Central Bank's minimum capital requirements, which are 8.38% for CET1 and 12.75% for Total Capital, following the early application of Article 104 a) of Banking Directive CRD V, which was authorised by the supervisor on 12 March 2020. The Group therefore exceeds regulatory CET1 by 892 basis points and Total Capital by 926 basis points.

2.- MANAGEMENT OF THE IMPACT CAUSED BY THE COVID-19 CRISIS

On 11 March 2020, the World Health Organization declared the outbreak of Coronavirus disease 2019 (COVID-19) to be an international pandemic, which has adversely affected activity and the global economy as of the second quarter of the year.

To address this situation, banking sector authorities have adopted various measures to tackle the hampered financial markets, to inject liquidity into the system and to give governments leeway to implement expansionary fiscal policies. The supervisory authorities have also freed up the capital buffers of financial institutions to bolster lending and have rolled out oversight measures to ensure the continuity of entities, while also recommending the limitation of dividend distributions charged to 2019-2020 profit.

In a similar vein, on 1 April 2020, the ECB urged entities to avail of the temporary capital adjustment contained in International Financial Reporting Standard 9 ("IFRS 9") and to take into account the guidelines of the European Securities and Markets Authority ("ESMA"), the European Banking Authority ("EBA") and the International Accounting Standards Board ("IASB") as regards evaluating the significant increase in credit risk and enabling for a collective assessment so as to avoid volatility in capital levels and in the financial statements.

The governments of different countries have adopted measures such as support for vulnerable groups and the financial system, the deferral of taxes, financial support for affected workers, guarantees on bank financing and support for systemic companies in difficulty.

In Spain, the COVID-19 crisis led the government to declare a state of emergency through the approval of Royal Decree-Law 463/2020, of 14 March 2020, Royal Decree-Law 926/2020, of 25 October 2020, and Royal Decree-Law 926/2020, of 3 November 2020, as well as the adoption of measures to alleviate the situation of vulnerable households, as well as promoting the flow of credit required to protect the self-employed and companies impacted by the consequences of the pandemic. These measures were

approved by the Spanish government through successive Royal Decree-Laws (8/2020, 11/2020, 25/2020, 26/2020, 34/2020 and 3/2021 being of most relevance to the banking sector), which included:

- Legislative moratoriums to cover the secured and unsecured mortgage loans of individuals and professionals, the common element of which was a free-of-charge temporary suspension of borrowers' repayment obligations.
- Guarantee facilities arranged through the Official Credit Institute (ICO) to ensure the liquidity and working capital needs of the self-employed, SMEs and companies, as well as to shore up production activity and employment.

Additionally, the CECA agreement of 16 April 2020, to which Bankia is a signatory, has introduced a sector-wide moratorium that supplements the scope of the mortgage moratorium approved by the government through the abovementioned Royal-Decree Laws. This sector-wide moratorium establishes the general criteria for deferral of payment by certain borrowers affected by the health and economic crisis – those who are unable to qualify for the public moratorium and therefore cannot benefit from it, or for those whose capacity proves insufficient – allowing for the deferral of payments within a specific period.

Notes 1.16 and 2.9 to the Bankia Group's consolidated annual accounts describe in detail the content of the public and private measures to provide financial support to the above-mentioned families and businesses, as well as the accounting treatment of the transactions granted to customers qualifying for the foregoing measures. This section will therefore discuss the impacts of the COVID-19 crisis and the effects that the package of regulatory and government measures have had on the results, financial position and operations of the Bankia Group in 2020, as well as the measures implemented by the entity to mitigate the effects of the pandemic and the future impact that the COVID-19 crisis may have on the Group.

2.1.- Measures to protect households, the self-employed and companies

As regards the legislative and sector-specific moratoriums and the ICO-backed financing, the main data on the applications received and the transactions granted at 31 December 2020 are as follows:

- Nearly 113,000 moratoriums have been granted for a gross carrying amount of approximately EUR 5,625 million, of which nearly EUR 3,400 million are legislative moratoriums related to transactions secured by a mortgage, EUR 375 million are legislative moratoriums related to transactions not secured by a mortgage, and approximately EUR 1,850 million are sector-specific moratoriums. The outstanding balance on these transactions at 31 December 2020 is approximately EUR 4,600 million. Almost all the financing has been granted to households, 89% was secured by a mortgage, 87% had a maturity of less than six months, and most of the balances have been classified as performing.

In 2020 the Group has recognised a negative amount of EUR 13 million in the consolidated income statement as a result of adjusting the carrying amount of the transactions modified under a legislative moratorium to the renegotiated cash flows.

- The amount drawn down on the new loans extended and backed by a public guarantee (ICO guarantee) totals more than EUR 8,200 million, approximately. Of this balance, more than 95% corresponds to companies, of which approximately 69% are SMEs. Approximately 75% of the amount of these transactions is guaranteed.

Since the outset of the crisis, Bankia has also rolled out a number of measures aimed at bolstering the economic resilience and covering the financial needs of its customers, the most noteworthy of which are as follows:

- The granting of bridge loans which are gradually cancelled against the drawdown of the ICO guarantee facilities.
- Extending the deadlines of working capital financing for the self-employed, micro companies and larger businesses.
- Refund of accident insurance instalments for the self-employed during the lockdown months.
- Temporary reduction or suspension of banking fees (collection of fees associated with the "Por Ser Tú" programme made more flexible, free cash withdrawals across the entire ATM network, reimbursement of POS terminal fees for the self-employed and small businesses that were unable to operate as a result of the COVID-19 crisis).

- Support for customers through the implementation of measures to address their needs (bringing forward pension and unemployment benefit payments, free shopping delivery service for pensioner customers, introduction of instalment payments for insurance policies, online mortgage moratorium simulator).

2.2.- Measures adopted by Bankia to mitigate the effects of COVID-19 on its operations

Since the outset of the crisis, Bankia has rolled out a number of measures to ensure normal operations of the Bank which include the following:

- At the beginning of the crisis, the Group activated contingency plans to ensure the entity remained fully operational and could carry out its activities from the start of the state of emergency. A Contingency Committee made up of various executives and members of senior management was set up, which has monitored the situation on a daily basis, coordinating the actions carried out in different areas during the most critical months of the pandemic.
- The various areas of the Group identified their key functions, segregated teams and IT infrastructure and organised rotating shifts for key personnel and their replacements.
- Coronavirus prevention and protection protocols were established, periodically updated in coordination with the health authorities and complemented by various internal guides. Bankia has been in permanent contact with the health authorities, has received advice from QUIRON Prevención and has held numerous meetings with the State Health and Safety Committee to keep this committee informed at all times of the measures adopted within the context of the pandemic.
- Depending on workplace characteristics, various prevention and work-life balance measures were established for employees, ranging from rotating shifts to working from home for a sizeable number of Bankia professionals,, which has reached nearly 95% for central services and 40% for the branch network.
- In terms of technology, the capabilities of data systems and lines were amplified and suitable equipment was provided to adapt the organisation to the new remote working situation.
- The contingency plans put in place enabled the vast majority of branches to remain up and running during the state of emergency declared at the outset of the pandemic and practically all of the Bank's ATMs were operational.
- A workgroup was formed for the gradual and safe return of Bankia professionals to the work place through a health questionnaire and a COVID-19 test, a new hotdesking system to facilitate the rotation of staff, and ongoing flexibility measures for a work-life balance. These plans also involve the combination of working from home with office-based working in order to minimise risks.

2.3.- Impact of the crisis on the results of the Group

As indicated in note 2.9 to the consolidated annual accounts, the Group has recognised provisions of EUR 505 million in 2020 due to COVID-19. The charge for these provisions was recognised to comply with the current accounting and prudential framework and is aligned with the pronouncements made by the various regulators and supervisors; it has had a major impact on attributable profit at the end of the reporting period.

2.4.- Impact on turnover

As regards business performance, the lending activity existing prior to the COVID-19 crisis started to pick up at the end of the second quarter. The mortgage lending segment climbed from the low in April to levels higher than those registered before the pandemic (up 14.3% on the entire year with respect to 2019). In consumer lending the recovery has been more gradual. Therefore, the volume of new consumer loans has declined by 53.6% over the year due to the slowdown in economic activity since the emergence of the pandemic, although it showed clear signs of recovery in the third and fourth quarters. In business banking, the

outstanding amount on lending to this segment has grown by 17% with respect to the previous year due to the new ICO-backed transactions. The net result is a rise in the balance of loans and advances to customers of EUR 3,541 million (+3%) with respect to December 2019.

On the liability side, customer deposits have grown by EUR 3,675 million (+2.9%). Deposits have grown, both in terms of companies, which have deposited part of the liquidity drawn down to tackle the effects of the pandemic, and households, as the reduced activity and the heightened uncertainty due to the crisis have incentivised saving. Off-balance sheet products overall were up by 5.5% on the back of the positive performance of investment funds, which overcame the sharp spike in market volatility caused by the COVID-19 pandemic during the first quarter of the year.

2.5.- Impact on the financial position of the Group

In respect of the **non-performing exposures and NPL ratio**, the Group is continuously monitoring the main indicators to anticipate potential impacts derived from the crisis. The control measures implemented have contained the decline in the credit quality of the portfolio. Accordingly, the Group's non-performing exposures have totalled EUR 6,213 million at the 2020 year-end, down 3.9% on December of the previous year (EUR 6,465 million), and the NPL ratio stands at 4.7% (5% at the 2019 year-end).

As regards **solvency**, despite the economic scenario caused by the crisis, the Group has retained its capital generation ability, reaching a CET1 Phase In ratio of 17.30% and a Total Capital Phase In ratio of 22.01%, meaning it has comfortable buffers above the regulatory minimums for 2020 (see chapter 7 on "Capital management, solvency and leverage").

Bankia's **liquidity position** has remained solid throughout the pandemic with the LCR ratio standing at 195.22% at 31 December 2020. The Group also has an ample liquidity buffer, with available liquid assets amounting to EUR 35,048 million at the end of year, which would enable it to cover its debt maturities by a factor of 1.6 times. This situation is strengthened further by the packages of anti-crisis measures announced by central banks to significantly hike liquidity in the system, coupled with the fact that the Group has taken preventative steps to shore up its position in this regard. As part of these measures, in the second quarter of the year Bankia drew down the maximum amount provided through the ECB's TLTRO III facility, which is currently drawn down in an amount of EUR 22,919 million. Additionally, the entity draws up an annual Financial Plan for both the short and medium term, which is evaluated as part of the liquidity adequacy self-assessment process, with protection of the balance sheet assets and liabilities and the main indicators of liquidity and financing risk. The Financial Plan takes into consideration the situation caused by COVID-19, ensuring sufficient liquidity from both an economic and regulatory standpoint.

2.6.- Impact on the strategic focus and objectives

The financial objectives of the Group's 2018-2020 Strategic Plan included the annual ordinary cash dividend distribution of around 45-50% of attributable profit and additional capital actions which would have been considered when the generation of Fully-Loaded CET1 capital exceeded the target of 12%.

Following the instructions of the European Central Bank, on 27 March 2020 Bankia's Board of Directors decided that, given the potential impact of the COVID-19 crisis, the entity had to be very prudent in setting shareholder remuneration. Accordingly, it reviewed the capital distribution objective set in the Group's 2018-2020 Strategic Plan, ruling out any extraordinary distributions for 2020.

2.7.- Future impact of COVID-19 on the Bankia Group

The specific impact on subsequent periods of the current health crisis and the mitigating effects of the support measures introduced by the Government and financial institutions have yet to be seen. Nonetheless, the Group faces a number of risks common to the entire banking sector and tied to the future of the pandemic, such as a potentially major increase in bad debt, a drop-off in new loans granted to private customers, particularly consumer loans, greater fluctuation in the value of its assets (including financial instruments measured at fair value and securities held for liquidity reasons), a negative impact on the cost of financing (particularly in a climate where future credit ratings may be affected) and weaker results due to the decline in production activity and consumer spending caused by the pandemic.

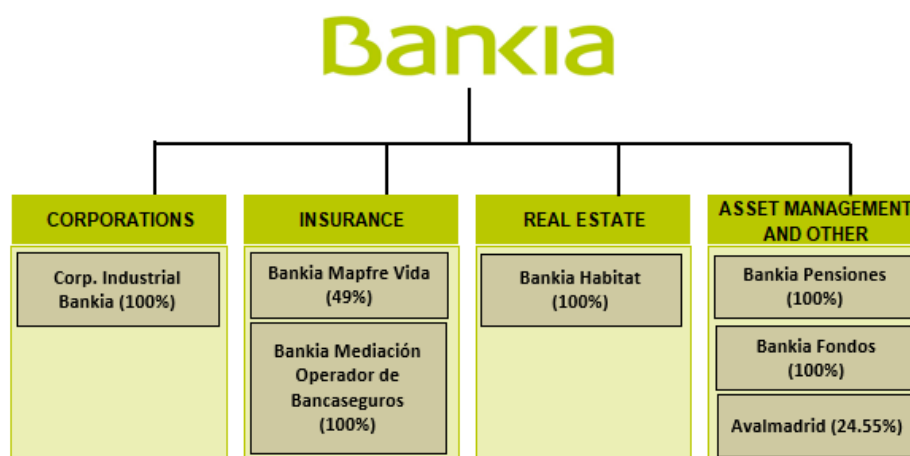
In this regard, the Group is monitoring its loan portfolios and the main risk indicators on a continual basis to anticipate any potential impacts from the crisis on asset quality, while continuing to use efficiency and cost controls as major management levers to mitigate the effects of the pandemic.

3.- ORGANISATIONAL STRUCTURE AND BUSINESS MODEL

3.1.- Overview of Bankia Group and its organisational structure

Bankia is a financial group with a nationwide presence, whose activity is mainly focused on traditional retail banking, corporate banking, asset management and private banking. Bankia does business mainly in Spain. The Group had total assets at 31 December 2020 of EUR 209,842 million. The Group's branch network comprised 2,127 offices at year end. Section 3.3 below provides a breakdown of the network by region.

Bankia's main shareholder is BFA, Tenedora de Acciones, S.A.U. ("BFA"), which, at the December 2020 close, held shares representing 61.83% (62.48% including the impact of treasury shares) of its share capital. Organisationally, Bankia is the Group's parent. The consolidated group is made up of 41 companies comprising subsidiaries, joint ventures and associates, engaging in a range of activities, including the provision of finance, insurance, asset management, services, real estate development and management. The ownership interests in the companies comprising the consolidated Bankia Group are kept directly in Bankia's own portfolio or, indirectly, through different holdings, the most relevant of which are as follows:



3.2.- Corporate governance

Bankia's governing bodies are the General Meeting of Shareholders and the Board of Directors.

- **The General Meeting of Shareholders** is the highest decision-making authority within the scope attributed to it by law or the bylaws; e.g. the appointment and removal of Directors, the approval of the annual accounts, the distribution of dividends or the acquisition or disposal of core assets, and the approval of the director remuneration policy, among others.
- **The Board of Directors** is responsible for representation of the Company and has the broadest of powers to manage the Company, except for matters reserved for the General Meeting of Shareholders. Its responsibilities include approving the strategic or business plan, management objectives and annual budgets, and determining the Company's general policies and strategies, the corporate governance policy for the Company and the Group, the responsible management policy, and supervising the functioning of any committees it may have set up and the actions of the delegate bodies.

There are **six Bankia Committees**, whose members are appointed considering their suitability based on their knowledge, aptitudes, experience and the duties of each Committee.

The Board of Directors The Board of Directors held 21 meetings in 2020	
(9 independent directors, 1 other external director and 3 executive directors)	
<ul style="list-style-type: none"> • Mr. José Ignacio Goirigolzarri Tellaache. Executive Chairman • Mr. José Sevilla Álvarez. Chief Executive Officer • Mr. Antonio Ortega Parra. Executive Director • Mr. Joaquín Ayuso García. Independent Director • Mr. Francisco Javier Campo García. Independent Director • Ms. Eva Castillo Sanz Lead Independent Director • Mr. Jorge Cosmen Menéndez-Castañedo. Independent Director • Mr. Carlos Egea Krauel. Other External Director • Mr. José Luis Feito Higuera. Independent Director • Mr. Fernando Fernández Méndez de Andés. Independent Director • Ms. Laura González Molero. Independent Director • Mr. Antonio Greño Hidalgo. Independent Director • Ms. Nuria Oliver Ramírez. Independent Director 	

Audit and Compliance Committee	
<p>The responsibilities of the Audit and Compliance Committee include monitoring the effectiveness of internal control, internal audit, regulatory compliance and risk management systems, both financial and non-financial, as well as the statutory financial and non-financial reporting processes; making proposals to the Board on the selection, appointment, re-election and replacement of the external statutory auditors, and conducting relations with the auditors; and examining and supervising compliance with the Company's governance and compliance rules.</p> <p>The Regulations of the Audit and Compliance Committee were modified in 2020 to bring them into line with the reviewed Good Governance Code for Companies approved by the Spanish National Securities Market Commission (CNMV) in June 2020.</p>	<p>Five directors, four independent and one other external director:</p> <ul style="list-style-type: none"> - Mr. Francisco Javier Campo García (Chairman) - Mr. Carlos Egea Krauel (Committee member) - Mr. José Luis Feito Higuera (Committee member) - Mr. Fernando Fernández Méndez de Andés (Committee member) - Mr. Antonio Greño Hidalgo (Committee member) <p>The Committee held 20 meetings in 2020</p>

Appointments and Responsible Management Committee	
<p>The general powers of the Appointments and Responsible Management Committee include proposing and reporting on the appointment and removal of directors and senior executives; assessing the competencies, knowledge, ability, diversity and experience required on the Board of Directors; assessing the time and commitment required for directors to be able to perform their duties effectively; defining the functions and aptitudes required of candidates to fill vacancies; examining and organising the succession plan in the Board of Directors and of the Company's senior executives; reporting on the plan applicable to senior executives; reviewing the sustainable management policy; and supervising that the Company's environmental and social practices are consistent with the strategy and policies in place.</p> <p>The Regulations of the Appointments and Responsible Management Committee were modified in 2020 to bring them into line with the reviewed Good Governance Code for Companies approved by the Spanish National Securities Market Commission (CNMV) in June 2020.</p>	<p>Four independent directors:</p> <ul style="list-style-type: none"> - Ms. Eva Castillo Sanz (Chairwoman) - Mr. Joaquín Ayuso García (Committee member) - Mr. Francisco Javier Campo García (Committee member) - Ms. Laura González Molero (Committee member) <p>The Committee held 13 meetings in 2020</p>

Remuneration Committee	
<p>The Remuneration Committee has general authority to propose and report on remuneration and other contractual terms and conditions of directors and senior executives. It periodically reviews the remuneration programs, considering their appropriateness and utility and ensuring transparency of remuneration and compliance with the remuneration policy set by the Company, among other responsibilities.</p>	<p>Four independent directors:</p> <ul style="list-style-type: none"> - Mr. Antonio Greño Hidalgo (Chairman) - Mr. Joaquín Ayuso García (Committee member) - Mr. Jorge Cosmen Menéndez-Castañedo (Committee member) - Ms. Laura González Molero (Committee member) <p>The Committee held 10 meetings in 2020</p>

Risk Advisory Committee	
Among other functions, the Risk Advisory Committee advises the Board on the overall propensity of risk and the risk strategy, seeking to ensure that the pricing policy for assets and liabilities offered to customers has regard to the risk strategy, presenting risk policies and proposing to the Board the company and Group's risk control and management policy through the Internal Capital Adequacy Assessment Process. It supervises the internal control and risk management function and proposes the system of credit risk delegation to the Board of Directors.	Four independent directors: <ul style="list-style-type: none"> - Mr. Joaquín Ayuso García (Chairman) - Mr. Fernando Fernández Méndez de Andés (Committee member) - Ms. Laura González Molero (Committee member) - Mr. Antonio Greño Hidalgo (Committee member) The Committee held 19 meetings in 2020

Board Risk Committee	
An executive body with responsibility for approving risks falling within the scope of the powers delegated to it by the Board of Directors, and for overseeing and managing the exercise of the powers delegated to lower-ranking bodies. It approves important transactions and defines overall risk limits. It also reports to the Board of Directors on those risks that may affect solvency, recurring profits, operations or the reputation of the Company, among other responsibilities.	An executive director and two independent directors: <ul style="list-style-type: none"> - Mr. José Sevilla Álvarez (Chairman) - Ms. Eva Castillo Sanz (Committee member) - Mr. Fernando Fernández Méndez de Andés (Committee member) The Committee held 27 meetings in 2020

Technology and Innovation Committee	
In May 2020, Bankia's Board of Directors approved the creation of a Technology and Innovation Committee, tasked, among other functions, with assisting the Board of Directors with complying with its supervisory and decision-making responsibilities on technology-related matters in activities with an impact on the Bank's business, taking a holistic approach. Prior to their submission for the approval of the Board of Directors, the Technology and Innovation Committee seeks to understand and report on the Company's technology, innovation, cyber security and data analysis policies and/or strategies, supervising and monitoring any specific plans and projects of particular relevance in this regard, debating such matters and proposing initiatives for the consideration of the Board.	Two executive directors and three independent directors: <ul style="list-style-type: none"> - Mr. José Ignacio Goirigolzarri Tellaeche (Chairman) - Mr. Francisco Javier Campo García (Committee member) - Ms. Eva Castillo Sanz (Committee member) - Ms. Nuria Oliver Ramírez (Committee member) - Mr. Antonio Ortega Parra (Committee member) The Technology and Innovation Committee held 2 meetings between the date on which it was formed on 27 May 2020 and 31 December 2020.

The **Board's policy** is to delegate the day-to-day management of the Company to the executive bodies and management team and to focus on its **general supervisory role** and the consideration of those matters that are particularly important to the Company.

In relation to the above, the Board of Directors defined a **Corporate Governance System** that ensures healthy, prudent management of the Company and that provides for an appropriate distribution of functions within the organisation and the prevention of conflicts of interest. The Board oversees the application of this system and regularly monitors and assesses its effectiveness, taking whatever measures are necessary to resolve possible deficiencies.

One of Bankia's main priorities is to align its corporate governance with Spanish and international best practices. In particular, in compliance with requirements in domestic and European banking regulations and the recommendations and principles of good governance contained in the Code of Good Practices of supervisors and regulators, Bankia has the corporate governance system as a general framework for internal organisation affecting the bank and all the companies that make up the Bankia Group.

The corporate governance system covers and guarantees the proper functioning of internal governance, thereby assuring healthy, prudent management of the entity and its Group, the core objective being to satisfy the corporate interest, understood as the common interest of all shareholders of an independent, public limited company focused on the profitable and sustainable pursuit of its objects and the creation of long-term value. The main priorities of Bankia's Corporate Governance System are:

- To ensure a correct distribution of functions within the organisation
- To prevent and resolve conflicts of interest
- To establish a transparent framework for relations between Bankia and its shareholders

The system embodies the Group's corporate values with respect to business ethics and sustainability and is backed by the principles of good governance developed by the Company based on the recommendations of the Good Governance Code of listed companies

A key part of the corporate governance system is the set of rules and regulations, which provides a Groupwide internal control framework. They comprise a set of internal rules that regulate the Company's corporate governance and the operational functioning, basically made up of **Corporate Texts** (Corporate Bylaws, General Meeting Regulations, Board of Directors Regulations, the Regulations of the Audit and Compliance Committee, the Regulations of the Appointments and Responsible Management Committee and the Regulations of the Remuneration Committee), **Internal Procedures and Rules of Conduct** (including the Code of Ethics and Conduct, and the Internal Rules of Conduct for Securities Markets activities) and **Corporate Policies**, (including the Bankia Group Corporate Governance and Organisational Structure Policy, the Bankia Internal Governance Policy, the Policy on Information, Communication, Contacts and Involvement with shareholders, institutional investors, proxy advisors and other stakeholders, the Policy on the Suitability of Directors, General Managers of Similar and Other Key Function Holders at Bankia and the Policy on the Selection, Diversity, Integration and Training of Directors, the Remuneration Policy for directors, and that for general managers and persons performing senior management functions, the Senior Management Selection and Appointment Policy, the Risk Control and Risk Management Policies, the Investment and Financing Policy, the Sustainable Management Policy, the Dividend Policy, the Treasury Shares Policy, the Conflicts of Interest Policy, the Regulatory Compliance Policy and the New Products Policy).

Turning to director appointments, on 27 March 2020, the Shareholders' Meeting agreed to set the number of Board members at 13 and approved the appointment of Ms. Nuria Oliver Ramírez, as Company director, on an independent basis, for the bylaw-stipulated term of four years.

Similarly, the above General Meeting of Shareholders resolved to re-elect the Company directors Mr. José Sevilla Álvarez, as an executive director, Mr. Joaquín Ayuso García, as an independent director, Mr. Francisco Javier Campo García, as an independent director, Ms. Eva Castillo Sanz, as an independent director, and Mr. Antonio Greño Hidalgo, as an independent director for the bylaw-stipulated term of four years.

On the same date, the Board Meeting held after the General Meeting of Shareholders adopted the following resolutions:

- To re-elect Mr. José Sevilla Álvarez as CEO of the Company.
- To re-elect Mr. Francisco Javier Campo García and Mr. Antonio Greño Hidalgo as members of the Audit and Compliance Committee, as well as to appoint Mr. Francisco Javier Campo García as Chairman of the Audit and Compliance Committee, in lieu of Mr. Antonio Greño Hidalgo, who had held such office until then.
- To re-elect Ms. Eva Castillo Sanz, Mr. Joaquín Ayuso García and Mr. Francisco Javier Campo García as members of the Appointments and Responsible Management Committee, as well as to re-elect Ms. Eva Castillo Sanz as Chairwoman of the Appointments and Responsible Management Committee.
- To re-elect Mr. Joaquín Ayuso García as a member of the Remuneration Committee and to appoint Mr. Antonio Greño Hidalgo as a member and Chairman of the Remuneration Committee in lieu of Mr. Francisco Javier Campo García, who stood down as member and Chairman of the Remuneration Committee.
- To re-elect Mr. José Sevilla Álvarez and Ms. Eva Castillo Sanz as members of the Board Risk Committee, as well as to re-elect Mr. José Sevilla Álvarez as Chairman of the Board Risk Committee.
- To re-elect Mr. Joaquín Ayuso García, Ms. Eva Castillo Sanz and Mr. Antonio Greño Hidalgo as members of the Risk Advisory Committee, as well as to re-elect Mr. Joaquín Ayuso García as Chairman of the Risk Advisory Committee.
- To ratify Ms. Eva Castillo Sanz in her position as Lead Independent Director until finalisation of the three-year term for which she was appointed.

Moreover, on 27 May 2020, within the context of the entity's commitment to digitalisation, innovation, cyber security and data analysis, the Board of Directors resolved to modify the Board Regulations in order to introduce article 14 bis, regulating the Technology and Innovation Committee, resolving to set up the above Committee within the Board of Directors and appointing its members. The Technology and Innovation Committee is headed by the Bankia Chairman, Mr. José Ignacio Goirigolzarri, and

comprises the executive director and General Manager of People, Resources and Technology, Mr. Antonio Ortega, and the independent directors Mr. Francisco Javier Campo, Ms. Eva Castillo and Ms. Nuria Oliver, with Mr. Miguel Crespo as secretary.

Bankia also has a **Management Committee**, currently composed of twelve members: the Chairman of the Board of Directors, Mr. José Ignacio Goirigolzarri, the Chief Executive Officer, Mr. José Sevilla, the Executive Director and General Manager of People, Resources and Technology, Mr. Antonio Ortega, the Deputy General Director of Business Banking, Mr. Gonzalo Alcubilla, the Deputy General Director of Financial Management, Mr. Leopoldo Alvear, the Deputy General Director of Communication and External Relations, Mrs. Amalia Blanco, the General Secretary and Deputy General Director of the General Secretariat, Mr. Miguel Crespo, the Deputy General Director of Credit Risks, Mr. Manuel Galarza, the Deputy General Director of People and Culture, Mr. David López, the Deputy General Director of Asset Management and Investees, Mr. Fernando Sobrini, the Deputy General Director of Retail Banking, Mr. Eugenio Solla, and the Deputy General Director of Transformation and Digital Strategy, Mr. Carlos Torres.

3.3.- Business model

The Bankia Group is a franchise with a presence throughout Spain, focusing on Retail and Business Banking, and a strategy focused on growing in multi-channel business. The main objective of the Group's activity is to create sustainable, recurring long-term value, to respond to the expectations of its shareholders, customers, employees and society at large. Accordingly, the Bankia Group's business model is characterized by its customer focus, providing a service that is close to customers, professional, adapted to multiple channels and tailored to customers' needs at all times.

The Group carries out its business through a network of 2,127 branches, distributed geographically as follows:

Autonomous region	Number of offices
Andalusia	309
Aragon	9
Asturias	10
Balearic Islands	131
Canary Islands	98
Cantabria	20
Castilla-La Mancha	102
Castilla y León	118
Catalonia	131
Ceuta	4
Extremadura	9
Galicia	19
La Rioja	47
Madrid	564
Melilla	1
Murcia	151
Navarra	3
Basque Country	17
Valencia	384
TOTAL OFFICES	2.127

The commercial model of the Bankia Group is structured along three main business lines:

- Retail Banking
- Business Banking
- Asset management and investees

Note 1.14 to the Bankia Group's consolidated annual accounts provides a breakdown of the profit or loss of each business segment at 31 December 2020 and 2019, as well as the key balance sheet items at each year end. For the purposes of segment reporting, note 1.14 to the consolidated annual accounts includes asset management activities in the Retail Banking segment whereas investees are included in the Corporate Centre, which, in addition to investees, also includes non-current assets held for sale and the rest of the operations other than those included in the three main business lines described previously.

Retail Banking

Retail Banking includes retail banking activity with legal and natural persons with annual revenue of less than EUR 6 million, distributed through a large multi-channel network in Spain and operating a customer satisfaction and profitability-oriented business model.

Retail banking is a strategic business for Bankia; it is one of Spain's leading financial institutions in this segment. The Bank focuses its efforts on traditional banking products, such as mortgages, consumer loans, direct salary debits, deposits, credit cards, payments of bills, insurance, investment funds, automatic portfolio and pension management and other financial advisory services, in the latter case for high net worth customers requiring specialist financial and tax advice.

With respect to its **business model**, Retail Banking focuses on **retail activity** following a universal banking model. Its objective is to achieve customer satisfaction and loyalty, retaining customers and, providing them with added value in products and services, in advisory and service quality, thereby increasing their satisfaction rate with Bankia. To this end, it segments its customers, offering a specialised, multichannel customer service, as well as products and services adapted to each segment, enabling it to offer comprehensive customer advice catering to the needs of each type of customer (retail customers, self-employed workers, SMEs and traders and portfolio customers receiving financial advice and customers with Conecta con tu Experto portfolios, including personal banking customers).

The main **objectives and future strategies of the Bankia Group to continue driving retail banking activity** in the short and medium-term focus on improving margins and profitability, increasing lending and controlling non-performing loans. And all of this with a customer-oriented approach.

Bankia's distribution network is composed of a finely meshed, well-distributed **branch network**, a complementary agency network (spearheaded by Mapfre) that gives the Bank a valuable competitive advantage, and a low-cost multichannel distribution network (e.g. ATMs, Internet, Mobile and Telephone Banking). Bankia's commercial model is based on a segmented branch network with universal branches, agile branches, business branches and private banking centres.

In line with its multi-channel strategy, the bank has a complete array of technological channels that allow customers to carry out their transactions, contract and manage products, and contact their agents. Amongst these are the "Conecta con tu Experto" ("connect with your expert") service, provided through multichannel managers integrated within the multichannel branches, which targets digital customers requiring a personalised service. These customers mainly interact with Bankia through remote channels (Bankia Online, mobile applications, telephone) and who, based on their current value and/or commercial track record, require a more proactive commercial approach and personalised service.

Business Banking

Business Banking is the Bankia division in charge of providing services to companies with annual sales volumes of over EUR 6 million (Business Banking and Corporate Banking), including the main public sector players (State and the Autonomous Regions, among others), and the activities in Capital Markets and teams specialising in business development, such as the Sustainable Finance and Business Department created in 2019. Customers, legal persons and self-employed workers with revenues below EUR 6 million are managed by the Retail Banking area.

The customer base is highly diversified across productive and economic sectors, especially commerce, manufacturing (industry), services, procurement and construction.

Bankia Group's **business model** in this segment is customer-oriented and strongly supported by specialist teams, which focus on long-term profitability and customer management, providing customers with quality services, especially financing for their business ventures.

Business Banking has different segments and distribution channels:

- **Business Banking.** Business Banking targets growth in the banking business of customers with annual revenues of over EUR 6 million (excluding those belonging to the corporate segment). It has a network of centres throughout Spain, concentrated in the regions with the greatest business activity. A network of specialist managers is responsible for serving customers and bringing in business. They are assigned a limited number of customers, structuring portfolios where the region's critical mass so allows, based on company revenues, in order to provide a personalised service. The managers also receive support from teams of experts in legal, tax, risk approval and management, marketing and specialised products.
- **Corporate Banking.** This segment caters to Bankia's largest accounts, which have several common denominators: the size of the businesses (over EUR 300 million in annual sales), groups comprising a large number of companies, and the demand for more complex and sophisticated financial services. Commercial coverage of Corporate Banking customers is provided by three centres, in Madrid, Barcelona and Palma de Mallorca, the latter specialised in dealing with customers from the tourism sector. These centres are home to specialised sector-specific teams, working alongside Capital Markets product teams.
- **Capital Markets.** The Capital Markets segment consists of a number of areas specialised in products, offering specific financial solutions requested mainly by Business Banking and Corporate Banking customers.

These segments and distribution channels come in addition to a powerful online banking service called BOL-E ("Bankia On-Line Empresas"), which allows client companies to carry out practically all their transactional operations.

The commercial **strategy** is predicated on active management of total returns for clients, combining a price discipline that sets floor prices based on the cost of funds and the client's risk (assessed using Bank of Spain-approved internal models), efficiency in capital consumption by including the RaR (Risk adjusted Return) approach to transactions, and the active search for cross-selling opportunities.

Asset management and investees

This segment covers private banking activities, asset management, insurance, strategic partnerships and investees.

The **private banking** business is geared towards the high-wealth or high-income individual customers, investment companies or foundations. Bankia offers these customers a comprehensive range of products and services with highly personalised, professional and reliable treatment, providing them with solutions that are tailored to their financial or tax needs. The main private banking business lines are wealth management and advisory, the sale of third-party financial products, intermediation in the trading of financial assets and advisory regarding the securities market. To this end, the Private Banking area offers customers an extensive catalogue of both in-house and third-party products, as well as specialised tools and reports.

Bankia Fondos and Bankia Pensiones are responsible for **asset management**, providing financial products to the retail network.

Bankia owns 100% of Bankia Fondos SGIIC and has marketing agreements with international fund managers for certain niche products. Bankia's investment fund manager offers a wide range of competitive, high-quality products in all categories (money market, fixed income, equities, mixed, guaranteed, global, etc.), in both Spain and abroad. This variety allows it to meet the needs of different customer profiles, from the most conservative, whose priority is capital preservation, to the more adventurous, who are willing to take certain risks in exchange for a higher return. Moreover, mandated by Bankia, Bankia Fondos manages the portfolios of customers from the office network.

Bankia Pensiones, a wholly-owned subsidiary of Bankia, is the Group's pension fund management company. It is engaged in the management of all types of pension plans (individual, employment and related), focusing on meeting unitholders' needs and offering products that are suitable for their investment profile and the time horizon established by the retirement age. In pension funds, Bankia has made significant efforts to encourage long-term saving, highlighting the need to begin saving with a view to supplementing future pensions sufficiently in advance. Pension funds advisory services and simulation tools are the main marketing tools for these retirement saving products.

Bankia's **Bancassurance** department is in charge of coordinating and promoting the insurance brokerage activity at Bankia and provides specialised support to the branches. To this end, it has designed a catalogue of insurance tailored to customers' needs, whether individuals (life, home, auto and health) or businesses (comprehensive trade, credit insurance, general liability and comprehensive business).

The Bancassurance department focusses its efforts on increasing the amount of insurance arranged, boosting market penetration, streamlining operations at branches to improve employee productivity and strengthening remote channels for contracting insurance.

The Bancassurance department defines the framework for relations with partner insurance companies based on the strategic alliances entered, with the aim of boosting the contribution from the sale of insurance products to the entity's commission.

The **Strategic Partnerships and Investees** division manages the corporate relationship framework with Bankia's strategic partners in the insurance and consumer finance businesses at points of sale mainly. Within this activity, it coordinates the supervision and development of agreements entered into with partners (Mapfre and Crédit Agricole Consumer Finance), ensuring mutual compliance with the commitments therein. As part of these actions, it coordinates horizontal cooperation projects with partners that drive these strategic businesses.

This division is also tasked with defining, managing and implementing disposal plans and the liquidation of the Group's investees and investment vehicles, as well as overseeing the ordinary and corporate management of the Group's subsidiaries. Additionally, its duties, in coordination with the business and innovation areas, include the responsible management of promoting, analysing and designing investment projects and the development of new businesses and alliances in areas where the entity aims to strengthen its competitive position. It particularly focuses on digital businesses (Fintech) and the projects and activities that can generate earnings for the entity.

The **Agency Network** department develops and manages a business model based on a variable cost external sales force supplementing the Bank's branch network that enables it to attract new customers and additional business across all areas, even where the branch network has little presence, distributing the relevant Group products as and when decided and referring customers to the banks' various (physical and digital) contracting channels.

This division, in line with a selective admission policy, is tasked with reaching and fostering collaboration agreements with significant potential to win new customers and business for the Bank, designing the business models and operational and oversight policies in conjunction with the Corporate Directorate of Regulatory Compliance, the Corporate Directorate of Legal Services, the Corporate Directorate of the Retail Network and the Corporate Directorate of Business Banking. It currently has four customer channels:

- Agreements with mortgage platforms that provide qualified and quality leads with high conversion rates.
- International customer channels that provide high-profile EU-resident customers and high quality mortgage business.
- Corporate sector and private banking channels (SMEs and self-employed customers) which help the Bank's sales network to increase its market share in these segments.
- Assurbanking agreement with insurance company Mapfre, seeking to ensure that the relevant agreements and undertakings are duly observed, while furthering and adopting the necessary measures to facilitate the fulfilment of the business plan.

Developments in digitalisation and the multi-channel network

Bankia's business model includes a commitment to a multi-channel approach and to digital banking that is a pillar of the Group's commercial positioning. Bankia has made the digital transformation one of the mainstays of its 2018-2020 Strategic Plan. Accordingly, at the close of December 2020, Bankia's digital customers represented 60.5% of the entity's customer base, while digital sales accounted for 46.9% of the Group's total sales.

The initiatives undertaken until now, and the advances in the multi-channel strategy already rolled out, are designed to enhance customer satisfaction and attract new customers to the Bankia Group. While the results obtained in recent years are encouraging, the Group is seeking to continue work in this field.

4.- ACTIVITY AND RESULTS**4.1.- Economic and financial environment**

Globally, in 2020 the extensive spread of the coronavirus (COVID-19) in March and April triggered the worst global recession since the second world war due to the lockdown measures implemented to curb the pandemic. The social and mobility restrictions were gradually lifted as of May, leading to a strong rebound in activity, which was bolstered by the unprecedented tax and monetary stimulus measures. However, the re-emergence of major outbreaks at the end of the summer, which persisted throughout the fourth quarter, led to the reinstatement of restrictions on a large part of the service sector in the leading developed economies, which provoked a further contraction of activity. Growth was also stymied by the high degree of political uncertainty as a result of the US elections in November and the seemingly never-ending Brexit negotiations. In the short term, the health and economic situation will remain difficult, but the start of vaccination campaigns in December has boosted confidence that the pandemic will begin to ease definitively starting next spring.

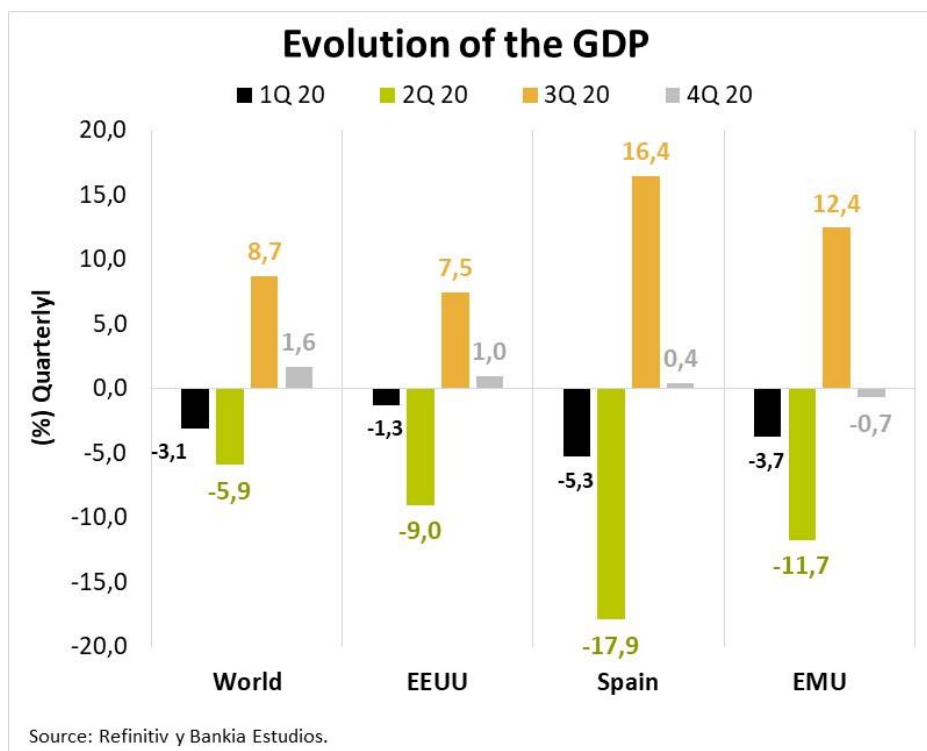
Overall, 2020 was an exceptionally negative year for the global economy. With the exception of China, which was exceedingly successful in controlling the pandemic and managed to close the year with positive GDP growth, the other major economies posted severe contractions in growth, albeit unevenly depending on the structure of their economies, the scale of their public aid and management of the health crisis. Specifically, GDP in the EMU may have contracted by over 7% in 2020, albeit on a very disparate basis among countries: approximately 10% in the Southern European countries that are more dependent on tourism and leisure, as opposed to the estimated 5.5% in Germany. These most uneven effects pose a new threat of fragmentation and led the EU to sign a historic agreement, giving the green light to a Recovery Fund of EUR 750,000 million which, in conjunction with the SURE employment programme and the soft credit facilities extended to ESM governments and EIB companies, will raise the EU stimulus package to EUR 1.3 trillion.

The impact of the COVID-19 pandemic on the economy and companies was felt acutely in risk assets, as reflected by the accumulated decline in the S&P 500 of 35% in just a month, 38% on the Euro Stoxx 600 and 42% on the IBEX, which led various countries to impose short-selling bans. This worsening investor sentiment, coupled with the liquidity tensions, as witnessed in the commercial paper, interbank and public debt markets, led central banks to move at a pace and with a decisiveness never seen before. The Fed lowered interest rates by 150 basis points and cut the benchmark ratio to 0%; it also established a new round of QE that is unlimited in terms of volume and timescales and put various facilities in place that have enabled it to intervene in almost all market segments. It also improved the terms of dollar swap arrangements with other central banks and repurchased from them Treasury Bills in exchange for dollars. The ECB expanded its QE programme (APP) by EUR 120,000 million until the end of 2020 and launched another programme (PEPP) in an amount of EUR 750,000 million, which was then expanded to EUR 1.85 billion. The PEPP included Greek debt and non-financial commercial paper and it abolished the 33% limit on its purchases of public debt. It also approved fresh injections of long-term liquidity and improved their terms and conditions.

The commitment of central banks to ensure favourable financial conditions and ample liquidity, coupled with the initial control of the pandemic and the progress made in treatments and vaccines, all supported an ongoing recovery in risk assets, which came to reach an all-time high in the US, while European indices bounced back by 75% from their February/March lows. Moreover,

12-month Euribor fell sharply from the high of -0.05% to an all-time low of less than -0.50%: Risk premiums on European peripheral bonds also fell, with the IRR on Spanish 10-year bonds hitting levels very close to 0%.

In Spain, the performance of the economy in 2020 was dictated entirely by the COVID-19 crisis, which disrupted all initial forecasts, which had been pointing to a prolongation of the expansive growth phase. The extraordinary measures adopted to contain the spread of the pandemic limited people's mobility and paralysed a major part of production activity, which led to an unprecedented contraction of GDP in the first half of the year. Although the subsequent lifting of the restrictions allowed for a gradual recovery in activity, this growth was incomplete and far from uniform among the Spanish regions, sectors and individual economic agents. Moreover, a progressive slide in the momentum of the recovery could be observed from the summer onwards as outbreaks re-emerged, which led to the reintroduction of restrictive measures.



Spain therefore posted a fall in GDP of 11%, a contraction not seen since at least the Spanish Civil War. The impact of the crisis has been more pronounced in Spain than in neighbouring countries due to various factors. Firstly, the spread of the pandemic was relatively worse in Spain and the initial restrictions at the beginning of the crisis were more stringent than in other countries. Secondly, the major weight of service sector activities, especially those tied to tourism (hospitality and catering, leisure and transport), which are labour intensive and require greater social interaction, as well as peculiarities of Spain's productive landscape, such as the high degree of temporary employment and the smaller size of companies, all made the Spanish economy particularly susceptible to this pandemic and hindered a swift exit from the crisis.

The economic policy response has been key to mitigating the impact of the crisis. Among the measures implemented, of particular note are the furlough schemes (ERTE) and the granting of public guarantees for the financing of companies (ICO credit lines).

The risks to financial stability have risen following the outbreak of the pandemic, although they have been attenuated somewhat by the monetary, fiscal and prudential measures adopted. Against this backdrop, **the banking sector** is playing a key role in mitigating the economic impact of the crisis, by extending the financing required by households and companies. To this end, the sector finds itself in a much more solid position than in the global financial crisis of 2008, supported by a better-quality balance sheet, a sound liquidity position and the considerable reinforcement of capital ratios.

In 2020, bank lending to the private sector grew for the first time since 2008, boosted by the support measures implemented, which stimulated the new flow towards productive activities, essential to meet the liquidity needs of the companies hardest hit

by the pandemic. By contrast, household lending remained negative, despite the uptick in new lending for house purchases, which contrasts with the fall in consumer loans. Non-performing loans remained contained, partly as a result of support measures and the expansion of lending. Deposits climbed at a faster pace, driven by the increase in household savings, which reached an all-time high, and the accumulation of liquidity by companies. The rise in asset impairment ahead of the potential negative impact of the pandemic was the main trigger for the sharp decline in results during the year.

Given the growing limitations to increase revenues, the reduction of operating costs has gained weight in strategies, opening the door to a new process of consolidation within the European banking system, which is at this point markedly domestic and led by Spanish banks. Lastly, the vast regulatory and supervisory response to the impact of the health crisis took shape in a substantial raft of measures which have led to an improvement in the capital levels of Spanish banks, which now present a high loss-absorption capacity, as reflected by the latest Bank of Spain stress tests.

4.2.- Corporate transactions undertaken in 2020

Details of the corporate transactions carried out in 2020 are included in notes 1.15, 14.2, 18.4 and 27.3 to the Bankia Group's consolidated annual accounts, notably the following:

- **Disposal of investment in Caser.** On 23 January 2020 Bankia, S.A. entered into an agreement with Helvetia Schweizerische Versicherungsgesellschaft AG to sell its investment in Caja de Seguros Reunidos, Compañía de Seguros y Reaseguros, S.A. ("Caser"), which at 31 December 2019 was classified under "Non-current assets and disposal groups classified as held for sale". Once the regulatory authorisations relating to the transaction were secured, on 25 June 2020 the sale was closed, which led to a gain of EUR 51 million, recognised in the consolidated income statement under "Gains or (-) losses on non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations".
- **Merger of the insurance companies.** In 2020 the merger by absorption of Caja Granada Vida, Compañía de Seguros y Reaseguros, S.A. and Cajamurcia Vida y Pensiones de Seguros y Reaseguros, S.A. (absorbed companies) into Bankia Mapfre Vida, S.A., de Seguros y Reaseguros (absorbing company) was carried out, with no significant impact on the Group's consolidated equity. At 31 December 2019 the Group held a 49% stake in both the absorbed and absorbing companies, which was classified as "Investments in joint ventures and associates - Associates". The situation regarding the investment and classification has not changed in the absorbing company at 31 December 2020.
- **Transfer of the custodian business to Cecabank.** On 29 May 2020 Bankia, S.A. reached an agreement with Cecabank, S.A. for the transfer of its CIU and pension funds custodian business. Once the conditions precedent of the agreement had been reached, which involved obtaining the relevant administrative authorisations, the business was derecognised at 31 December 2020. The fixed amount of the consideration received was EUR 170 million, without considering subsequent additional collections subject to the achievement of certain volume targets. The net gain recorded after the transaction amounted to EUR 155 million, with a liability recognised for the remaining amount which will be recorded against profit or loss to the extent that the Group meets the performance commitments set out in the contract for a period of ten years from the signature date.
- **Other changes in the Group's composition** In 2020 Corporación Financiera Habana, S.A. in liquidation was wound up. This investment was fully impaired at the liquidation date.

4.3.- Key figures

KEY FIGURES - BANKIA GROUP

Balance (thousands of euros)	Dec-20	Dec-19	Variation
Total assets	209,841,949	208,468,273	0.7%
Loans and advances to customers (net)	121,005,463	117,444,266	3.0%
Loans and advances to customers (gross)	124,317,275	120,611,846	3.1%
Customer funds on balance sheet	146,896,325	143,464,445	2.4%
Deposits from customers	128,459,531	124,784,736	2.9%
Debt securities issued	18,436,794	18,679,709	(1.3%)
Total customer funds managed	176,041,105	171,099,696	2.9%
Total turnover ⁽²⁾	297,046,568	288,543,962	2.9%
Equity	13,080,233	13,335,097	(1.9%)

Solvency and leverage (thousands of Euros and %)	Dec-20	Dec-19	Variation
Common Equity Tier 1 capital (CET1) - BIS III Phase In	17.30%	14.32%	+2.98 p.p.
Solvency ratio - Total Capital BIS III Phase In ratio	22.01%	18.09%	+3.92 p.p.
Risk-weighted assets BIS III	67,265,254	77,634,917	(13.4%)
Phase In leverage ratio (Delegated Regulation 62/2015)	6.32%	5.89%	+0.43 p.p.

Risk managed (millions of Euros and %)	Dec-20	Dec-19	Variation
Total risks	132,220,636	128,156,293	3.2%
Non-performing balances (NPEs)	6,213,163	6,465,461	(3.9%)
NPL provisions	3,613,318	3,491,313	3.5%
NPL ratio	4.7%	5.0%	(0.3) p.p.
Coverage ratio	58.2%	54.0%	+4.2 p.p.

Results (thousands of euros)	Dec-20	Dec-19	Variation
Net interest income	1,904,118	2,023,027	(5.9%)
Gross income	3,088,423	3,245,030	(4.8%)
Pre-provision operating income/expenses	1,307,853	1,428,350	(8.4%)
Results from operating activities	288,492	950,857	(69.7%)
Profit before tax from continuing operations	311,493	755,690	(58.8%)
Profit for the period	230,022	542,289	(57.6%)
Attributable to the parent	229,803	541,436	(57.6%)

Relevant ratios (%)	Dec-20	Dec-19	Variation
Efficiency ⁽³⁾	57.7%	56.0%	+1.7 p.p.
ROA ⁽⁴⁾	0.1%	0.3%	(0.2) p.p.
RORWA ⁽⁵⁾	0.3%	0.7%	(0.4) p.p.
ROE ⁽⁶⁾	1.8%	4.2%	(2.4) p.p.
ROTE ⁽⁷⁾	1.9%	4.3%	(2.4) p.p.

Bankia shares	Dec-20	Dec-19	Variation
No. of shares at period-end	3,069,522,105	3,069,522,105	0.0%
Share price at period-end (Euros)	1.45	1.90	(23.8%)
Market cap (Euros)	4,447,737,530	5,839,765,805	(23.8%)
Earnings per share (Euros)	0.07	0.18	(57.6%)

Additional information	Dec-20	Dec-19	Variation
No. of employees	15,950	16,035	(0.5%)
Average supplier payment period (days)	9.39	9.44	(0.5%)

- (1) Comprising customer deposits, debt securities issued and funds managed off-balance sheet.
(2) Comprising net loans and advances to customers, customer funds managed on and off the balance sheet.
(3) Administrative expenses and depreciation over gross income.
(4) Profit for the year over average total assets in the period.
(5) Profit for the year over risk-weighted assets at period-end.
(6) Profit for the year attributable to the parent over average own funds in the period.
(7) Profit for the year attributable to the parent over average tangible own funds in the period.

4.4.- Balance sheet highlights and performance

CONSOLIDATED BALANCE SHEET - BANKIA GROUP

(thousands of Euros)	Dec-20	Dec-19	Variation vs. Dec -19	
			Amount	%
Cash, cash balances at central banks and other demand deposits	11,808,227	13,202,885	(1,394,658)	(10.6%)
Financial assets held for trading	6,767,906	6,690,901	77,005	1.2%
Derivatives	6,686,668	6,518,725	167,943	2.6%
Debt securities	80,554	170,795	(90,241)	(52.8%)
Equity instruments	684	1,381	(697)	(50.5%)
Non-trading financial assets mandatorily at fair value through profit or loss	11,385	34,755	(23,370)	(67.2%)
Debt securities	193	237	(44)	(18.6%)
Loans and advances to credit institutions	-	23,263	(23,263)	(100.0%)
Loans and advances to customers	11,192	11,255	(63)	(0.6%)
Financial assets at fair value through other comprehensive income	8,623,635	11,981,872	(3,358,237)	(28.0%)
Equity instruments	59,543	75,817	(16,274)	(21.5%)
Debt securities	8,564,092	11,906,055	(3,341,963)	(28.1%)
Financial assets at amortised cost	163,405,078	155,968,440	7,436,638	4.8%
Debt securities	37,495,038	33,067,987	4,427,051	13.4%
Loans and advances to credit institutions	4,915,769	5,467,442	(551,673)	(10.1%)
Loans and advances to customers	120,994,271	117,433,011	3,561,260	3.0%
Derivatives - Hedge accounting	2,451,227	2,498,821	(47,594)	(1.9%)
Investments in joint ventures and associates	468,538	454,902	13,636	3.0%
Tangible and intangible assets	3,023,359	3,018,696	4,663	0.2%
Non-current assets and disposal groups held for sale	1,660,569	2,151,599	(491,030)	(22.8%)
Other assets	11,622,025	12,465,402	(843,377)	(6.8%)
TOTAL ASSETS	209,841,949	208,468,273	1,373,676	0.7%
Financial liabilities held for trading	6,876,191	6,750,111	126,080	1.9%
Derivatives	6,686,987	6,478,878	208,109	3.2%
Short positions	189,204	271,233	(82,029)	(30.2%)
Financial liabilities at amortised cost	187,069,874	185,176,254	1,893,620	1.0%
Deposits from central banks	22,899,832	13,808,756	9,091,076	65.8%
Deposits from credit institutions	14,834,045	26,460,485	(11,626,440)	(43.9%)
Deposits from customers	128,459,531	124,784,736	3,674,795	2.9%
Debt securities issued	18,436,794	18,679,709	(242,915)	(1.3%)
Other financial liabilities	2,439,672	1,442,568	997,104	69.1%
Derivatives - Hedge accounting	153,150	87,402	65,748	75.2%
Provisions	1,285,037	1,754,035	(468,998)	(26.7%)
Other liabilities	1,377,464	1,365,374	12,090	0.9%
TOTAL LIABILITIES	196,761,716	195,133,176	1,628,540	0.8%
Minority interests (non-controlling interests)	2,547	13,325	(10,778)	(80.9%)
Accumulated other comprehensive income	145,339	180,002	(34,663)	(19.3%)
Own funds	12,932,347	13,141,770	(209,423)	(1.6%)
TOTAL EQUITY	13,080,233	13,335,097	(254,864)	(1.9%)
TOTAL LIABILITIES AND EQUITY	209,841,949	208,468,273	1,373,676	0.7%

- **Summary of the Group's activity**

The Bankia Group ended 2020 with total assets of EUR 209,842 million on its balance sheet, up 0.7% on December 2019 owing to the new lending transactions extended in the context of the COVID-19 crisis and fixed-income purchases in the year.

Loans and advances to customers were up 3% due to the increase in new business and drawdowns from corporate facilities (mainly new ICO-backed lending to companies).

Growth in customer funds has been 3.4%. On the one hand, customer deposits have risen by 2.9% as a result of the higher savings rate of individuals and the excess liquidity deposited by companies since the onset of the pandemic. On the other, off-balance sheet funds were up by 5.5% mainly on the back of the positive performance of investment funds once business volumes recovered following the initial hit given by the COVID-19 pandemic during the first quarter of the year.

Following is a summary of the trends in the Group's most significant balance sheet items in 2020.

- **Cash, cash balances at central banks and other demand deposits**

This caption fell by EUR 1,395 million (-10.6%), reflecting the use of part of the excess liquidity deposited at the end of 2019 in the Bank of Spain's treasury account to increase credit granted and finance the acquisition of fixed income during the year.

- **Loans and advances**

Note 3 and Appendices IX and X to the Bankia Group's consolidated annual accounts provide details on its lending policies, NPL monitoring, debt refinancing and recovery policies with respect to credit risk. Also provided in this note and appendices is the breakdown of credit risk by product, segment and activity, as well as the loan-to-value (LTV) distribution of secured loans, the maturity profile, details of refinancing and restructuring transactions, along with additional information on financing for property development, housing purchases and real estate assets foreclosed or received in payment of debt. Therefore, from a management perspective, this item describes trends in loans and receivables during 2020 and the main movements therein.

Loans and advances to customers reported as financial assets at amortised cost amounted to EUR 120,994 million, up 3.0% in the year reflecting the impacts the current COVID-19 health crisis is having on the financing needs of different collectives. There has been an increase in lending to companies, stemming from larger drawdowns from facilities and new ICO-backed transactions arranged to cover working capital needs in the first months of the crisis, which is reflected in higher balances recorded in non-financial corporations (+13.5%) and other financial corporations (+30.0%). This growth in corporate financing, together with the increased lending to the public sector (+16.1%), offset the fall in household balances (-3.5%), both due to mortgage maturities and the lower volume of new consumer loans, which were affected by the pandemic-induced economic scenario.

Within loans and advances to customers, non-performing loans totalled EUR 5,709 million in 2020, down EUR 143 million (-2.5%) reflecting outflows due to recoveries, foreclosures, derecognitions, transfers to disposal groups and sales (see note 12.8 to the 2020 consolidated annual accounts relating to "Doubtful assets"). In 2020 non-performing loans included loans reclassified from non-current assets held for sale of EUR 306 million, gross (see section 8, "Risk Management").

AND ADVANCES TO CUSTOMERS OF THE BANKIA GROUP AT AMORTISED BY COUNTERPARTY SECTORS

(thousands of Euros)	Dec-20	Dec-19	Variation vs. Dec -19	
			Amount	%
Public sector	5,726,419	4,933,611	792,808	16.1%
Other financial corporations	2,561,946	1,970,643	591,303	30.0%
Non-financial corporations	42,061,478	37,068,929	4,992,549	13.5%
Households	73,967,432	76,638,663	(2,671,231)	(3.5%)
Loans and advances to customers, gross	124,317,275	120,611,846	3,705,429	3.1%
Impairment losses	(3,323,004)	(3,178,835)	(144,169)	4.5%
Loans and advances to customers, net	120,994,271	117,433,011	3,561,260	3.0%

• Debt securities

Debt securities, recognised under “Financial assets held for trading”, “Non-trading financial assets mandatorily at fair value through profit or loss”, “Financial assets at fair value through other comprehensive income” and “Financial assets at amortised cost” amounted to EUR 46,140 million compared to EUR 45,145 million at December 2019. Of the total recognised at December 2020, EUR 18,487 million were SAREB bonds received as a result of the asset transfer carried out by the Group in 2012 and 2013. The remainder comprises sovereign debt, mainly Spanish, and debt from other public and private issuers. The debt securities held in these portfolios by the Bankia Group at the end of 2020 and 2019 are as follows:

DEBT SECURITIES - BANKIA GROUP

(thousands of Euros)	Financial assets held for trading	Non-trading financial assets mandatorily at fair value through profit or loss	Financial assets at fair value through other comprehensive income	Financial assets at amortised cost	TOTAL
Spanish government debt securities	80,554	-	8,066,397	13,005,451	21,152,402
Foreign government debt securities	-	-	189,680	5,794,638	5,984,318
Financial institutions	-	-	6,367	25,025	31,392
Other fixed-income securities (**)	-	193	302,180	18,635,277	18,937,650
Impairment losses and other valuation adjustments	-	-	(532)	34,647	34,115
Total at 31 December 2020	80,554	193	8,564,092	37,495,038	46,139,877
Spanish government debt securities	142,414	-	11,155,672	10,012,858	21,310,944
Foreign government debt securities	18,485	-	291,393	4,255,837	4,565,715
Financial institutions	-	-	18,020	25,006	43,026
Other fixed-income securities (**)	9,896	237	441,515	18,783,873	19,235,521
Impairment losses and other valuation adjustments	-	-	(545)	(9,587)	(10,132)
Total at 31 December 2019	170,795	237	11,906,055	33,067,987	45,145,074

(**) Financial assets at amortised cost include the securities received as consideration for the assets transferred to the SAREB in 2012 and 2013.

Changes were reported during the year mainly in the fixed-income securities of the portfolio of financial assets at fair value through other comprehensive income, which decreased by EUR 3,342 million (-28.1%) on the figure reported at 31 December 2019, as a result of disposals and maturities during the year, amounting to EUR 8,564 million at December 2020. Meanwhile, the

portfolio of assets at amortised cost rose by EUR 4,427 million to EUR 37,495 million at December 2020 (+13.4%), which reflected the public debt purchases since the end of the previous year, net of sales during the period.

- **Non-current assets and disposal groups held for sale**

This caption was down EUR 491 million (-22.8%) in 2020 due mainly to the sale of the investment in Caser and the reclassification to financial assets at amortised cost of loans and advances to customers for a gross amount of EUR 306 million, which are not expected to be sold within one year of their classification as non-current assets held for sale due to the current market conditions (see section 8, "Risk Management").

- **Financial liabilities at amortised cost**

Financial liabilities at amortised cost stood at EUR 187,070 million, up EUR 1,894 million (+1.0%) on December 2019.

FINANCIAL LIABILITIES AT AMORTISED COST - BANKIA GROUP

(thousands of Euros)	Dec-20	Dec-19	Variation vs. Dec -19	
			Amount	%
Deposits from central banks	22,899,832	13,808,756	9,091,076	65.8%
Deposits from credit institutions	14,834,045	26,460,485	(11,626,440)	(43.9%)
Deposits from customers	128,459,531	124,784,736	3,674,795	2.9%
Public Sector	5,443,813	4,778,218	665,595	13.9%
Other financial corporations	6,713,510	7,328,297	(614,787)	(8.4%)
Non-financial corporations	15,126,091	13,334,595	1,791,496	13.4%
Households	96,310,984	94,063,075	2,247,909	2.4%
Repurchase agreements	48,025	45,526	2,499	5.5%
One-off non-marketable mortgage-backed securities	4,817,108	5,235,025	(417,917)	(8.0%)
Debt securities issued	18,436,794	18,679,709	(242,915)	(1.3%)
Other financial liabilities	2,439,672	1,442,568	997,104	69.1%
Total financial liabilities at amortised cost	187,069,874	185,176,254	1,893,620	1.0%

Deposits from central banks and deposits from credit institutions

Deposits from central banks totalled EUR 22,900 million at the end of 2020, an increase of EUR 9,091 million during the year (+65.8%) as a result of Bankia taking the maximum capacity of the ECB's TLTRO III facility in the midst of the economic situation caused by COVID-19.

Deposits from credit institutions amounted to EUR 14,834 million, down 43.9% since the end of December 2019, caused by the lower volume of repurchase agreements with other entities.

Deposits from customers

Customer deposits at the Group totalled EUR 128,460 million at the end of 2020, up EUR 3,675 million (+2.9%) during the year, reflecting the higher savings rate of individuals and the excess liquidity deposited by companies since the onset of the pandemic.

Within customer deposits, **strict customer deposits**, excluding repurchase agreements and one-off non-marketable mortgage-backed securities, totalled EUR 123,594 million, reflecting an increase of 3.4% during the year in both the public sector

(+13.9%) and the corporate sector (+13.4% in non-financial corporations), as well as in households (+2.4%). The growth is seen in the most liquid and lower cost resources (current accounts), attracting liquidity provided by companies to tackle the effects of the COVID-19 crisis and household savings in the current uncertain climate.

Off-balance sheet customer funds were up by 5.5% since December 2019 on the back of the positive performance of investment funds and pension plans once business volumes recovered following the initial impact of the COVID-19 pandemic during the first quarter of the year.

CUSTOMER DEPOSITS - BANKIA GROUP

(thousands of Euros)	Dec-20	Dec-19	Variation vs. Dec -19	
			Amount	%
Strict customer deposits	123,594,398	119,504,185	4,090,213	3.4%
Public Sector	5,443,813	4,778,218	665,595	13.9%
Other financial corporations	6,713,510	7,328,297	(614,787)	(8.4%)
Current accounts	5,231,087	4,926,023	305,064	6.2%
Time deposits ⁽¹⁾	1,482,423	2,402,274	(919,851)	(38.3%)
Non-financial corporations	15,126,091	13,334,595	1,791,496	13.4%
Current accounts	14,849,927	12,167,650	2,682,277	22.0%
Time deposits	276,164	1,166,945	(890,781)	(76.3%)
Households	96,310,984	94,063,075	2,247,909	2.4%
Current accounts	76,051,254	67,515,663	8,535,591	12.6%
Time deposits	20,259,730	26,547,412	(6,287,682)	(23.7%)
One-off non-marketable mortgage-backed securities	4,817,108	5,235,025	(417,917)	(8.0%)
Repurchase agreements	48,025	45,526	2,499	5.5%
Total customer deposits	128,459,531	124,784,736	3,674,795	2.9%
Investment funds ⁽²⁾	21,109,177	19,809,312	1,299,865	6.6%
Pension funds ⁽²⁾	8,035,603	7,825,939	209,664	2.7%
Total off-balance-sheet funds	29,144,780	27,635,251	1,509,529	5.5%
TOTAL CUSTOMER DEPOSITS	157,604,311	152,419,987	5,184,324	3.4%

(1) Excludes one-off non-marketable mortgage-backed securities, which are disclosed under a separate heading.

(2) Excludes off-balance sheet customer deposits sold by the group but managed by non-Bankia third parties.

Debt securities issued and subordinated debt

At the end of 2020, the balance of debt securities issued by the Group stood at EUR 18,437 million, a similar amount to December 2019 (EUR 18,680 million) due to the lack of significant issuances and maturities during the year.

Provisions

Provisions recognised on the Group's balance sheet amounted to EUR 1,285 million, down EUR 469 million (-26.7%) from the amount recognised at 31 December 2019. This decline was mainly due to the release, reversal and transfer to other balance-sheet items of provisions associated with ongoing litigation, guarantees given and employee pension funds. In the latter case, the main movements related to the change of the terms of the employee pension plans made in 2020 under the new labour agreement (see note 2.13.1. 2 of the consolidated annual accounts, "Description of post-employment obligations undertaken by the Group") and to completion of the Caser sale, which resulted in the post-employment commitments guaranteed by that company and recognised at 31 December 2019 being disclosed net of the related assets, as per applicable legislation (see note 20 to the consolidated annual accounts on provisions).

• Equity

At the end of 2020 the Group's equity totalled EUR 13,080 million, EUR 255 million (-1.9%) less than at year-end 2019 after accounting for the dividend paid with a charge to 2019 profit (EUR 352 million). Within equity, own funds stood at EUR 12,932 million, EUR 209 million less than at December 2019.

4.5.- Income statement performance

HALF-YEARLY INCOME STATEMENT - BANKIA GROUP

(thousands of Euros)	Dec-20	Dec-19	Variation vs. Dec -19	
			Amount	%
Net interest income	1,904,118	2,023,027	(118,909)	(5.9%)
Dividend income	1,854	17,434	(15,580)	(89.4%)
Share of profit or loss of entities accounted for using the equity method	59,749	60,024	(275)	(0.5%)
Total net fees and commissions	1,212,806	1,080,643	132,163	12.2%
Gains and losses on financial assets and liabilities	146,929	297,988	(151,059)	(50.7%)
Gains or losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss (net)	154,400	288,744	(134,344)	(46.5%)
Gains or losses on financial assets and liabilities held for trading (net)	15,832	19,870	(4,038)	(20.3%)
Gains or losses on non-trading financial assets mandatorily at fair value through profit or loss (net)	(516)	905	(1,421)	--
Gains or losses from hedge accounting (net)	(22,787)	(11,531)	(11,256)	97.6%
Exchange differences	13,228	15,321	(2,093)	(13.7%)
Other operating income and expenses (net)	(250,261)	(249,407)	(854)	0.3%
Gross income	3,088,423	3,245,030	(156,607)	(4.8%)
Operating expenses	(1,780,570)	(1,816,680)	36,110	(2.0%)
Administrative expenses	(1,585,198)	(1,615,728)	30,530	(1.9%)
Staff expenses	(1,069,775)	(1,119,420)	49,645	(4.4%)
Other administrative expenses	(515,423)	(496,308)	(19,115)	3.9%
Depreciation	(195,372)	(200,952)	5,580	(2.8%)
Pre-provision operating income/expenses	1,307,853	1,428,350	(120,497)	(8.4%)
Provisions or reversal of provisions	24,431	(14,552)	38,983	--
(Impairment or (-) reversal of impairment on financial assets not measured at fair value through profit or loss and modification losses or (-) gains, net)	(1,043,792)	(462,941)	(580,851)	125.5%
Results from operating activities	288,492	950,857	(662,365)	(69.7%)
Impairment or reversal of impairment of investments in joint ventures and associates	(97)	928	(1,025)	--
Impairment or reversal of impairment on non-financial assets	(21,680)	(20,244)	(1,436)	7.1%
Other gains and losses	44,778	(175,851)	220,629	--
Profit before tax from continuing operations	311,493	755,690	(444,197)	(58.8%)
Tax on profit from continuing operations	(81,471)	(213,401)	131,930	(61.8%)
Profit after tax from continuing operations	230,022	542,289	(312,267)	(57.6%)
Profit after tax from discontinued operations	--	--	--	--
Profit or (-) loss for the year	230,022	542,289	(312,267)	(57.6%)
Attributable to minority interests	219	853	(634)	(74.3%)
Attributable to owners of the parent	229,803	541,436	(311,633)	(57.6%)

Key indicators

Efficiency ratio ⁽¹⁾	57.7%	56.0%	+1.7 p.p.	3.0%
ROA ⁽²⁾	0.1%	0.3%	(0.2) p.p.	(58.3%)
ROE ⁽³⁾	1.8%	4.2%	(2.4) p.p.	(57.7%)

(1) (Administrative expenses and depreciation) / Gross income.

(2) Annualised profit for the period / Average total assets in the period.

(3) Annualised profit for the period attributable to the parent / Average own funds in the period.

INCOME STATEMENT OF THE BANKIA GROUP - QUARTERLY PERFORMANCE

(thousands of Euros)	04 2020	03 2020	02 2020	01 2020	04 2019	03 2019	02 2019	01 2019
Net interest income	493,498	488,592	464,011	458,017	503,196	502,063	516,225	501,543
Dividend income	651	694	108	401	2,510	793	13,520	611
Share of profit or loss of entities accounted for using the equity method	26,760	8,540	12,174	12,275	17,965	13,153	14,643	14,263
Total net fees and commissions	332,729	296,271	300,089	283,717	284,371	262,991	272,893	260,388
Gains and losses on financial assets and liabilities	13,599	3,233	66,372	63,725	61,642	96,779	102,486	37,081
Gains or losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss (net)	9,999	6,145	71,327	66,929	35,517	110,131	106,509	36,587
Gains or losses on financial assets and liabilities held for trading (net)	10,928	3,041	7,592	(5,729)	23,075	(11,161)	1,396	6,560
Gains or losses on non-trading financial assets mandatorily at fair value through profit or loss (net)	347	38	(1,064)	163	(20)	167	450	308
Gains or losses from hedge accounting (net)	(7,675)	(5,991)	(11,483)	2,362	3,070	(2,358)	(5,869)	(6,374)
Exchange differences	1,896	(1,560)	4,130	8,762	3,265	4,874	3,820	3,362
Other operating income and expenses (net)	(175,755)	(7,460)	(62,714)	(4,332)	(174,276)	(5,455)	(65,899)	(3,777)
Gross income	693,378	788,310	784,170	822,565	698,673	875,198	857,688	813,471
Operating expenses	(448,107)	(442,411)	(428,753)	(461,299)	(446,442)	(458,033)	(455,888)	(456,317)
Administrative expenses	(396,375)	(393,232)	(380,896)	(414,695)	(393,823)	(408,593)	(406,777)	(406,535)
Staff expenses	(270,336)	(259,934)	(254,544)	(284,961)	(266,890)	(281,900)	(285,627)	(285,003)
Other administrative expenses	(126,039)	(133,298)	(126,352)	(129,734)	(126,933)	(126,693)	(121,150)	(121,532)
Depreciation	(51,732)	(49,179)	(47,857)	(46,604)	(52,619)	(49,440)	(49,111)	(49,782)
Pre-provision operating income/expenses	245,271	345,899	355,417	361,266	252,231	417,165	401,800	357,154
Provisions or reversal of provisions	(23,547)	72,739	(10,543)	(14,218)	16,595	13,750	(34,851)	(10,046)
(Impairment or (-) reversal of impairment on financial assets not measured at fair value through profit or loss and modification losses or (-) gains, net)	(232,126)	(331,294)	(285,202)	(195,170)	(189,200)	(132,324)	(86,180)	(55,237)
Results from operating activities	(10,402)	87,344	59,672	151,878	79,626	298,591	280,769	291,871
Impairment or reversal of impairment of investments in joint ventures and associates	--	--	--	--	928	--	--	--
Impairment or reversal of impairment on non-financial assets	(11,623)	(2,415)	(4,850)	(2,792)	(6,391)	(4,510)	(5,819)	(3,524)
Other gains and losses	116,113	(36,944)	(6,997)	(27,394)	(110,075)	(42,490)	(3,803)	(19,483)
Profit before tax from continuing operations	93,991	47,985	47,825	121,692	(35,912)	251,591	271,147	268,864
Tax on profit from continuing operations	(43,919)	(10,442)	266	(27,376)	1,904	(75,663)	(75,539)	(64,103)
Profit after tax from continuing operations	50,072	37,543	48,091	94,316	(34,008)	175,928	195,608	204,761
Profit after tax from discontinued operations	--	--	--	--	--	--	--	--
Profit for the period	50,072	37,543	48,091	94,316	(34,008)	175,928	195,608	204,761
Attributable to minority interests	54	54	56	55	53	11	830	(41)
Attributable to owners of the parent	50,018	37,489	48,035	94,261	(34,061)	175,917	194,778	204,802

- Summary of the Group's results

INCOME STATEMENT OF THE BANKIA GROUP - KEY INDICATORS

	DECEMBER 2020			DECEMBER 2019		
	Amount	% of gross income	% of average total assets	Amount	% of gross income	% of average total assets
(thousands of Euros)						
Net interest income	1,904,118	61.7%	0.9%	2,023,027	62.3%	1.0%
Gross income	3,088,423	--	1.5%	3,245,030	--	1.6%
Operating expenses	(1,780,570)	57.7%	0.8%	(1,816,680)	56.0%	0.9%
Administrative expenses	(1,585,198)	51.3%	0.7%	(1,615,728)	49.8%	0.8%
Depreciation	(195,372)	6.3%	0.1%	(200,952)	6.2%	0.1%
Provisions or reversal of provisions	24,431	0.8%	0.0%	(14,552)	0.4%	0.0%
(Impairment or (-) reversal of impairment on financial assets not measured at fair value through profit or loss and modification losses or (-) gains, net)	(1,043,792)	33.8%	0.5%	(462,941)	14.3%	0.2%
Results from operating activities	288,492	9.3%	0.1%	950,857	29.3%	0.5%
Impairment or reversal of impairment of investments in joint ventures and associates	(97)	0.0%	0.0%	928	0.0%	0.0%
Impairment or reversal of impairment on non-financial assets	(21,680)	0.7%	0.0%	(20,244)	0.6%	0.0%
Other gains and losses	44,778	1.4%	0.0%	(175,851)	5.4%	0.1%
Profit before tax from continuing operations	311,493	10.1%	0.1%	755,690	23.3%	0.4%
Tax on profit from continuing operations	(81,471)	2.6%	0.0%	(213,401)	6.6%	0.1%
Profit after tax from continuing operations	230,022	7.4%	0.1%	542,289	16.7%	0.3%
Profit after tax from discontinued operations	-	-	-	-	-	-
Profit or (-) loss for the year	230,022	7.4%	0.1%	542,289	16.7%	0.3%
Attributable to minority interests	219	0.0%	0.0%	853	0.0%	0.0%
Attributable to owners of the parent	229,803	7.4%	0.1%	541,436	16.7%	0.3%

The Bankia Group ended 2020 with profit of EUR 230 million, down 57.6% on 2019, mainly due to provisions made in anticipation of future impacts derived from the worsening macroeconomic climate in relation to the COVID-19 crisis.

The Group's core profit (net interest income and fees and commissions less administration expenses and depreciation and amortisation) amounted to EUR 1,336 million, up 3.8% on 2019 due to the positive performance of fees and commissions and expenses.

The main movements in the Bankia Group's income statement items during 2020 are discussed below.

- Net interest income**

Net interest income for the Group totalled EUR 1,904 million, down EUR 119 million (-5.9%) year-on-year due to the impact of the decline in the yield curve (12-month Euribor) on the performance of the loan portfolio (mainly mortgages), the change in the portfolio mix, with a greater weight in the corporate segment and lower consumer volumes, as well as the lower contribution of interest from non-performing assets and the fixed income portfolio.

The following table shows a comparison between the Group's net interest income in 2020 and 2019, showing details of the average balances of income and expenses for the various items comprising total investment and funds, and the impact of changes in volumes and prices on the overall performance of net interest income in 2020 compared to 2019.

INCOME AND COST STRUCTURE - BANKIA GROUP

(millions of Euros and %) (*)	DECEMBER 2020			DECEMBER 2019			Variation		Effect		
	Average balance	Income / Expense	Rate	Average balance	Income / Expense	Rate	Average balance	Income / Expense	Calendar	Rate	Volume
Interest income											
Financial institutions ⁽¹⁾	18,703,644	209,228	1.12%	13,948,499	98,953	0.71%	4,755,145	110,275	271	56,879	53,124
Loans and advances to customers (a)	119,867,089	1,860,081	1.55%	118,373,032	2,042,282	1.73%	1,494,057	(182,201)	5,595	(210,911)	23,115
Debt securities	46,796,366	215,686	0.46%	48,206,395	304,672	0.63%	(1,410,029)	(88,986)	835	(83,347)	(6,474)
Other interest-bearing assets	873,640	3,973	0.45%	1,021,351	13,382	1.31%	(147,711)	(9,409)	37	(8,780)	(666)
Other non-interest-bearing assets	26,038,572	-	-	27,302,582	-	-	(1,264,010)	-	-	-	-
Total assets (b)	212,279,311	2,288,968	1.08%	208,851,858	2,459,289	1.18%	3,427,453	(170,321)	6,738	(213,908)	36,849
Finance costs											
Financial institutions ⁽¹⁾	43,393,197	70,302	0.16%	37,799,864	84,856	0.22%	5,593,332	(14,554)	232	(23,818)	9,032
Customer deposits (c)	125,781,385	93,261	0.07%	127,738,630	121,293	0.09%	(1,957,245)	(28,032)	332	(26,918)	(1,446)
Strict customer deposits	120,760,174	44,100	0.04%	121,311,132	39,449	0.03%	(550,958)	4,652	108	4,744	(201)
Repos	92,037	2,500	2.72%	331,247	2,367	0.71%	(239,210)	133	6	6,607	(6,481)
Singular covered bonds	4,929,174	46,661	0.95%	6,096,250	79,477	1.30%	(1,167,076)	(32,817)	218	(22,038)	(10,996)
Debt securities issued	18,588,587	207,453	1.12%	18,087,218	201,585	1.11%	501,368	5,868	552	(265)	5,580
Other interest-bearing liabilities	1,505,343	13,834	0.92%	1,578,609	28,528	1.81%	(73,266)	(14,694)	78	(14,103)	(670)
Other non-interest-bearing liabilities	9,944,564	-	-	10,364,935	-	-	(420,371)	-	-	-	-
Equity	13,066,237	-	-	13,282,602	-	-	(216,365)	-	-	-	-
Total equity and liabilities (d)	212,279,311	384,850	0.18%	208,851,858	436,262	0.21%	3,427,453	(51,412)	1,195	(58,802)	6,194
Customer margin (a-c)		1,766,820	1.48%		1,920,989	1.63%		(154,169)	5,263	(183,993)	24,561
Net interest margin (b-d)		1,904,118	0.90%		2,023,027	0.97%		(118,909)	5,543	(155,106)	30,654

(*) Amounts rounded to millions of euros.

(1) Includes central banks and credit institutions. Financial institutions under assets include the negative interest on balances with financial institutions under liabilities (mainly interest on TLTRO facilities and repos) given that, pursuant to accounting standards, income derived from the application of negative interest rates is allocated according to its nature. Conversely, financial institutions under liabilities include negative interest borne on the balances deposited with the Bank of Spain, reverse repos and deposits in other institutions.

Interest income fell 6.9% (EUR -170 million) on 2019 due to a decrease in interest rates as a result of lower credit yields (fall in 12-month Euribor, greater weight in the corporate segment portfolio combined with lower consumer volumes, lower interest contribution from doubtful assets) and the reduction in the average yield of fixed-income portfolios. The decline in interest from loans and advances and fixed-income portfolios has only been partially offset by the positive effect of the volume of financing taken from the ECB on better terms following the support measures adopted by the central bank in response to the COVID-19 pandemic (recorded in the accounts as an increase in income from financial institutions) and income related to the calendar effect (interest accrues over 366 days in 2020, rather than 365).

The Group's finance costs have decreased by 11.8% (EUR -51 million) compared to 2019, driven mainly by the fall in interest rates (lower cost of customer deposits and financing from financial institutions).

The margin on loans and advances to customers has fallen by 18 basis points on the year, to 1.55%, whereas the finance cost of customer deposits has decreased by 2 basis points to 0.07%, situating the customer margin at 1.48%, 15 basis points less than the 1.63% seen at December 2019.

The Group's net interest margin at the December 2020 close stood at 0.90%, 7 basis points below the margin at December 2019 (0.97%).

• Gross income

Gross income for the Bankia Group amounted to EUR 3,088 million, down 4.8% year-on-year, mostly due to lower gains on financial transactions and the aforementioned trend in net interest income.

Net fees and commissions totalled EUR 1,213 million, up 12.2% on 2019. Fees and commissions in the traditional banking business have improved, with those arising from collection and payment services (+26.3%) performing particularly well. Fees for contingent liabilities and commitments (+10.0%), the marketing of investment funds (+7.5%), pension plans (+1.4%), securities services (+20.2%) and structuring and design of corporate operations (+17.7%) also grew. This growth made up for the decrease in fee and commission income from insurance sales (-8.0%) and the rest of activities less related to the traditional business.

NET FEES AND COMMISSIONS - BANKIA GROUP

(thousands of Euros)	Dec-20	Dec-19	Variation vs. Dec -19	
			Amount	%
Traditional banking activity	632,806	513,759	119,047	23.2%
Contingent risks and commitments	108,991	99,113	9,878	10.0%
Collection and payment services	523,815	414,646	109,169	26.3%
Financial product sales	342,106	343,025	(919)	(0.3%)
Investment funds	139,451	129,722	9,729	7.5%
Pension funds	69,719	68,774	945	1.4%
Insurance	132,936	144,529	(11,593)	(8.0%)
Total fees and commissions from banking and sale:	974,912	856,784	118,128	13.8%
Other fees and commissions	306,477	310,855	(4,378)	(1.4%)
Securities service	82,527	68,661	13,866	20.2%
Structuring and design of operations	45,181	38,389	6,792	17.7%
Impaired asset management	1,564	3,788	(2,224)	(58.7%)
Debt claims	107,611	128,235	(20,624)	(16.1%)
Other	69,594	71,782	(2,188)	(3.0%)
Fees and commissions collected	1,281,389	1,167,639	113,750	9.7%
Fees and commissions paid	68,583	86,996	(18,413)	(21.2%)
Total net fees and commissions	1,212,806	1,080,643	132,163	12.2%

Net gains on financial assets and liabilities totalled EUR 147 million, 50.7% less than in 2019 due to the lower volume of fixed-income sales during the year.

Other operating income and expenses showed a net expense of EUR 250 million, which was in line with the figure recorded in 2019 (EUR 249 million). This net expense mainly includes the annual contribution to the Deposit Guarantee Fund (DGF) and the Single Resolution Fund (SRF), and the cost associated with the deposit tax.

The **other items** comprising gross income (dividends, share of profit or loss of entities accounted for using the equity method and exchange differences) totalled EUR 75 million at the reporting date, down EUR 18 million from 2019, due mostly to the lower dividend income (in 2019 extraordinary dividends of EUR 10 million were collected from equity investments, the most significant being SA Nostra, Compañía de Seguros de Vida).

• Operating expenses

Operating expenses (administrative expenses and amortisation and depreciation) amounted to EUR 1,781 million, reflecting a drop of 2.0% compared to 2019, mainly due to personnel expenses (-4.4%). This decrease has offset the rise in other administrative expenses (+3.9%), primarily IT and other general expenditure, including, inter alia, the outsourcing of administrative services.

The Group's efficiency ratio (operating expenses/gross income) at the end of 2020 stood at 57.7%, up on the 56% recorded in December 2019 owing to the lower gross income.

ADMINISTRATIVE EXPENSES - BANKIA GROUP

(thousands of Euros)	Dec-20	Dec-19	Variation vs. Dec -19	
			Amount	%
Staff expenses	1,069,775	1,119,420	(49,645)	(4.4%)
Salaries and wages	779,619	816,694	(37,075)	(4.5%)
Social Security	223,736	227,330	(3,594)	(1.6%)
Pensions	43,574	50,385	(6,811)	(13.5%)
Other	22,846	25,011	(2,165)	(8.7%)
Other general administrative expenses	515,423	496,308	19,115	3.9%
Properties, facilities and material	56,272	59,292	(3,020)	(5.1%)
IT and communications	219,368	207,166	12,202	5.9%
Advertising and publicity	47,895	54,375	(6,480)	(11.9%)
Technical reports	36,517	36,662	(145)	(0.4%)
Surveillance and security carriage services	16,775	18,122	(1,347)	(7.4%)
Contributions and other taxes	29,485	32,243	(2,758)	(8.6%)
Insurance and self-insurance premiums	3,451	3,603	(152)	(4.2%)
Other general expenses	105,660	84,845	20,815	24.5%
Total administrative expenses	1,585,198	1,615,728	(30,530)	(1.9%)
Efficiency ratio	57.7%	56.0%	+1.7 p.p.	3.0%

- Pre-provision operating income/expenses**

The performance of operating income and expenses resulted in a net pre-provision profit margin of EUR 1,308 million in 2020, down Euros 120 million (-8.4%) on 2019, since the higher fees and commissions and cost savings in the year were not enough to fully make up for the fall in income in the other items under this heading, mainly interest income and gains and losses on financial assets and liabilities.

- Provisions and write-downs**

Provisions or reversal of provisions, which mainly include provisions made for pending litigation, pension obligations, tax litigation, commitments and guarantees given, recorded a positive figure of EUR 24 million in December 2020 compared to the net provision of EUR 15 million recorded in 2019 due to the reversal with a credit to the income statement of provisions for the change in the terms of employee pension plans made in 2020 under the new labour agreement (see note 2.13.1.2 of the consolidated annual accounts relating to "Description of the post-employment obligations undertaken by the Group").

Impairment of financial assets not measured at fair value through profit or loss, which includes mainly provisions for credit losses, have recorded a significant increase of EUR 581 million (+125.5%) to reach EUR 1,044 million at the end of 2020, basically reflecting the allowances recognised during the year to cover the future impacts of the COVID-19 crisis, amounting to EUR 505 million (see section 2 of this report, "Management of the impact caused by the COVID-19 crisis").

Lastly, **impairment of non-financial assets**, mainly goodwill and other intangible assets, tangible assets and investment properties totalled EUR 22 million, EUR 1 million higher than the figure at December 2019.

The aforementioned trends in the various items of provisions and write-downs resulted in total charges of EUR 1,041 million in 2020, EUR 544 million more than the amount provisioned in 2019.

- **Other gains and losses**

This item mainly includes impairment of the Group's non-current assets held for sale (real estate assets foreclosed and investments in investees) and gains and losses on the sale of property and share stakes. At the end of December 2020 it showed a gain of EUR 45 million, which includes the gain from the sale of Caser and depository and the depository and custodian business (see section 4.2 of this report, "Corporate transactions undertaken in 2020"). In December 2019 this heading reflected a loss of EUR 176 million as it mainly reflected the aforementioned impairment of the Group's non-current assets held for sale.

- **Profit attributable to the parent**

In 2020 the Bankia Group obtained profit attributable to the parent of EUR 230 million, down 57.6% year-on-year after including the increase in provisions resulting from COVID-19.

5.- ALTERNATIVE PERFORMANCE MEASURES

In addition to the financial information prepared in accordance with the regulatory framework described in Note 1.3 to the consolidated annual accounts, the Bankia Group uses certain alternative performance measures ("APMs") widely used in the banking sector as indicators for monitoring the management of the Group's assets and liabilities and its financial and economic position. In compliance with the ESMA transparency directive for the protection of investors, published in October 2015, the following tables present breakdowns of the APMs used in this document, as well as their definition, the relevance of their use and the reconciliation with balance sheet and income statement line items used in their calculation.

5.1.- Activity and results

- **Customer funds managed**

Definition: sum of customer deposits, senior and subordinated wholesale issued notes and off-balance sheet customer resources.

Relevance: the measure is used as an indicator of the total volume of funds raised by the Group in the market.

Calculation method: sum of the following items:

- Customer deposits on the balance sheet
- Debt securities issued included on the balance sheet
- Balances of investment companies and funds and pension funds disclosed in Note 27.3 to the consolidated annual accounts.

Thousands of Euros		Dec-20	Dec-19	Dec-18
Sum	+ Deposits from customers	128,459,531	124,784,736	126,319,476
	+ Debt securities issued	18,436,794	18,679,709	18,360,095
	+ Investment companies and funds	21,109,177	19,809,312	17,210,417
	+ Pension funds	8,035,603	7,825,939	7,363,721
= Customer funds managed		176,041,105	171,099,696	169,253,709

- **Total turnover**

Definition: sum of loans and advances, customer deposits, senior and subordinated wholesale issued and off-balance sheet customer resources.

Relevance: this measure is used as an indicator of the Group's performance through the total volume of funds loaned and raised in the market.

Calculation method: sum of the following items:

- Loans and advances to customers on the balance sheet
- Customer deposits on the balance sheet
- Debt securities issued included on the balance sheet
- Balances of investment companies and funds and pension funds disclosed in Note 27.3 to the consolidated annual accounts.

Thousands of Euros		Dec-20	Dec-19	Dec-18
	+ Loans and advances to customers (non-trading financial assets)	11,192	11,255	9,161
	+ Loans and advances to customers (financial assets at amortised cost)	120,994,271	117,433,011	118,285,776
Sum	+ Deposits from customers	128,459,531	124,784,736	126,319,476
	+ Debt securities issued	18,436,794	18,679,709	18,360,095
	+ Investment companies and funds	21,109,177	19,809,312	17,210,417
	+ Pension funds	8,035,603	7,825,939	7,363,721
=	Total turnover	297,046,568	288,543,962	287,548,646

• **Strict customer deposits**

Definition: this measure relates to customer deposits, excluding market operations (repos and singular covered bonds).

Relevance: the measure is used as an indicator of the funds raised on the balance sheet from retail customers and companies.

Calculation method: this is the amount of customer deposits less repos and singular covered bonds.

Thousands of Euros		Dec-20	Dec-19	Dec-18
	+ Deposits from customers	128,459,531	124,784,736	126,319,476
Sum	- Repurchase agreements	(48,025)	(45,526)	(43,954)
	- Singular covered bonds	(4,817,108)	(5,235,025)	(6,247,854)
=	Strict customer deposits	123,594,398	119,504,185	120,027,668

5.2.- Profitability and efficiency

• **Gains and losses on financial assets and liabilities**

Definition: sum of the profit/(loss) from management of financial assets and liabilities and hedge accounting, as they are presented in the income statement.

Relevance: a figure commonly used in the banking sector to track the trend of revenue obtained from activities outside the typical banking business.

Calculation: sum of the following income statement line items:

- Gains or losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss, net.
- Gains or losses on financial assets and liabilities held for trading, net.
- Gains or losses on non-trading financial assets mandatorily at fair value through profit or loss, net.
- Gains or losses on financial assets and liabilities at fair value through profit or loss, net.
- Gains or losses from hedge accounting, net.

Thousands of Euros		Dec-20	Dec-19	Dec-18
	+ Gains or losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss, net.	154,400	288,744	399,555
	+ Gains or losses on financial assets and liabilities held for trading, net.	15,832	19,870	40,060
Sum	+ Gains or losses on non-trading financial assets mandatorily at fair value through profit or loss, net.	(516)	905	(429)
	+ Gains or losses on financial assets and liabilities at fair value through profit or loss, net.	-	-	-
	+ Gains or losses from hedge accounting, net.	(22,787)	(11,531)	(28,534)
=	Gains and losses on financial assets and liabilities	146,929	297,988	410,652

- Pre-provision operating income/expenses**

Definition: gross operating income less administrative expenses and depreciation.

Relevance: a metric commonly used in the banking sector to monitor the performance of the Bank's operating profit or loss excluding expenses arising from provisions for contingencies, credit risk, and impairment of real estate assets and equity investments.

Calculation: the aggregate of the following income statement line items:

- Gross income
- Administrative expenses
- Depreciation

Thousands of Euros		Dec-20	Dec-19	Dec-18
	+ Gross income	3,088,423	3,245,030	3,367,762
Sum	+ Administrative expenses	(1,585,198)	(1,615,728)	(1,696,323)
	+ Depreciation	(195,372)	(200,952)	(173,911)
=	Pre-provision operating income/expenses	1,307,853	1,428,350	1,497,528

- Core profit or loss**

Definition: the profit or loss obtained by the Group from its typical business (net interest income and fee and commission income) less operating expenses (administrative expenses and depreciation).

Relevance: used to compare operating costs with the revenue generated by the Bank's recurring business.

Calculation: the aggregate of the following income statement line items:

- Net interest income
- Net fees and commissions (fee and commission income less fee and commission expenses)
- Administrative expenses
- Depreciation

Thousands of Euros		Dec-20	Dec-19	Dec-18
	+ Net interest income	1,904,118	2,023,027	2,049,057
Sum	+ Net fees and commissions (fee and commission income less fee and cc	1,212,806	1,080,643	1,064,989
	+ Administrative expenses	(1,585,198)	(1,615,728)	(1,696,323)
	+ Depreciation	(195,372)	(200,952)	(173,911)
=	Core profit or loss	1,336,354	1,286,990	1,243,812

- Customer margin**

Definition: difference between the average interest rate charged on loans and advances to customers and the average interest rate paid on customer deposits.

Relevance: a commonly used metric in the banking sector to measure the profitability obtained by the Bank in its ordinary operations with customers.

Calculation: the average interest rate charged on loans and advances to customers is interest income on loans and advances to customers in the period divided by the average month-end balance of loans and advances to customers of the period analysed. The average interest rate paid on customer deposits is interest expenses on customer deposits in the period divided by the average month-end balance of customer deposits in the period analysed. Where the metric is presented at a date before the end of the reporting period, the numerator of both variables (interest income and interest expenses) is annualised.

Thousands of Euros and %			Dec-20	Dec-19	Dec-18
%	A	Average interest rate on loans and advances to customers (a)/(b)	1.55%	1.73%	1.68%
Numerator	(a)	Interest income on loans to customers	1,860,081	2,042,282	2,017,654
Denominator	(b)	Average month-end balances of loans to customers	119,867,089	118,373,032	120,281,930
%	B	Average interest rate paid on customer deposits (c)/(d)	0.07%	0.09%	0.12%
Numerator	(c)	Interest expenses on customer deposits	93,261	121,293	152,783
Denominator	(d)	Average month-end balances of customer deposits	125,781,385	127,738,630	125,872,734
A-B	=	Customer Margin (%)	1.48%	1.63%	1.56%

- Net interest margin**

Definition: difference between the Group's average return on assets and the average cost of liabilities and equity.

Relevance: this metric is commonly used by credit institutions to measure the profitability obtained on all their investments in assets.

Calculation: the average return on assets is total interest income for the period divided by the average month-end balance of assets of the period analysed. The average cost of liabilities and equity is total interest expenses for the period divided by the average month-end balance of total liabilities and equity of the period analysed. Where the metric is presented at a date before the end of the reporting period, the numerator of both variables (interest income and interest expenses) is annualised.

Thousands of Euros and %			Dec-20	Dec-19	Dec-18
%	A	Average return on assets (a)/(b)	1.08%	1.18%	1.19%
Numerator	(a)	Total interest income	2,288,968	2,459,289	2,454,206
Denominator	(b)	Average month-end balances of assets	212,279,311	208,851,858	206,523,762
%	B	Average cost of liabilities and equity (c)/(d)	0.18%	0.21%	0.20%
Numerator	(c)	Total interest expenses	384,850	436,262	405,149
Denominator	(d)	Average month-end balances of liabilities and equity	212,279,311	208,851,858	206,523,762
A-B	=	Net interest margin (%)	0.90%	0.97%	0.99%

- ROA**

Definition: measures the return on assets.

Relevance: this metric is commonly used, not only in the banking sector, but also other industries to measure entities' capacity to generate returns on the assets in which they invest.

Calculation: profit or loss for the period, as shown in the income statement (numerator) divided by the average month-end balance of assets of the period analysed. Where the metric is presented at a date before the end of the reporting period, the numerator is annualised.

Thousands of Euros and %		Dec-20	Dec-19	Dec-18
Numerator	(a) Profit or loss for the period	230,022	542,289	703,498
Denominator	(b) Average month-end balances of assets	212,279,311	208,851,872	206,523,762
(a)/(b)	= ROA (%)	0.1%	0.3%	0.3%

- RORWA**

Definition: measures the return on risk-weighted assets.

Relevance: this metric is commonly used in the financial sector to measure the return on risk-weighted assets, which includes an adjustment factor according to the risk taken by the Bank in the various types of assets in which it invests.

Calculation: profit or loss for the period divided by risk-weighted assets at the end of the period. Where the metric is calculated at a date before the end of the reporting period, the numerator is annualised.

Thousands of Euros and %		Dec-20	Dec-19	Dec-18
Numerator	(a) Profit or loss for the period	230,022	542,289	703,498
Denominator	(b) Regulatory risk-weighted assets	67,265,254	77,634,917	82,381,155
(a)/(b)	= RORWA (%)	0.3%	0.7%	0.9%

- ROE**

Definition: measures the return on equity.

Relevance: a standard measure of profitability in the banking and other business sectors used to measure the return on shareholders' equity.

Calculation: profit or loss attributable to owners of the parent divided by the average month-end balances of equity for the 12 months preceding the period end, adjusted for expected dividends. Where the metric is calculated at a date before the end of the reporting period, the numerator is annualised.

Thousands of Euros and %		Dec-20	Dec-19	Dec-18
Numerator	(a) Attributable to owners of the parent	229,803	541,436	703,210
Denominator	(b) Average own funds adjusted by expected dividend	12,861,076	12,807,316	12,647,768
(a)/(b)	= ROE (%)	1.8%	4.2%	5.6%

- ROTE**

Definition: measures the return on equity excluding intangible assets (return on tangible equity).

Relevance: a metric used to measure the return on entities' tangible equity.

Calculation: profit or loss attributable to owners of the parent divided by the average month-end balances of equity less intangible assets for the 12 months preceding the period-end, adjusted for expected dividends. Where the metric is calculated at a date before the end of the reporting period, the numerator is annualised.

Thousands of Euros and %		Dec-20	Dec-19	Dec-18
Numerator	(a) Attributable to owners of the parent	229,803	541,436	703,210
Denominator	(b) Average tangible own funds adjusted by expected dividend	12,394,740	12,454,425	12,374,592
(a)/(b)	= ROTE (%)	1.9%	4.3%	5.7%

- **Efficiency ratio**

Definition: measures operating costs as a percentage of gross income.

Relevance: this metric is commonly used in the banking sector to compare costs incurred with income generated.

Calculation: operating expenses (administrative expenses and depreciation) for the period divided by gross income, with both taken from the income statement.

Thousands of Euros and %		Dec-20	Dec-19	Dec-18
Numerator	(a) Operating expenses	1,780,570	1,816,680	1,870,234
	Administrative expenses	1,585,198	1,615,728	1,696,323
	Depreciation	195,372	200,952	173,911
Denominator	(b) Gross income	3,088,423	3,245,030	3,367,762
(a)/(b)	= Efficiency ratio (%)	57.7%	56.0%	55.5%

5.3.- Risk management

- **NPL ratio**

Definition: relationship between non-performing loans and the total balance of customer credit risk and contingent risks. This metric includes insignificant amounts with credit institutions and fixed-income securities.

Relevance: this is one of the main indicators used in the banking sector to monitor the status and performance of the entities' credit risk.

Calculation: non-performing exposures divided by the Group's total risks, which mostly comprise loans and advances to customers.

Thousands of Euros and %		Dec-20	Dec-19	Dec-18
Numerator	A Non-performing exposures (a)+(b)+(c)	6,213,163	6,465,461	8,415,700
	(a) Loans and advances to customers	5,709,235	5,852,871	7,716,438
	(b) Contingent risks	492,115	599,542	683,950
	(c) Credit institutions and fixed income	11,813	13,048	15,312
Denominator	B Total risks (d)+(e)+(f)	132,220,636	128,156,293	129,791,970
	(d) Loans and advances to customers	123,011,612	119,440,410	121,464,276
	(e) Contingent risks	9,197,211	8,702,835	8,312,382
	(f) Credit institutions and fixed income	11,813	13,048	15,312
A/B	= NPL ratio (%)	4.7%	5.0%	6.5%

- **NPL coverage ratio**

Definition: measures the degree of impairment of NPLs for which impairment allowances have been recognised.

Relevance: a commonly used metric in the banking industry to monitor coverage with provisions for non-performing exposures.

Calculation: NPL provisions divided by the Group's non-performing exposures. NPL provisions include all provisions set aside by the Group to cover non-performing exposures. Non-performing exposures include both loans and advances to customers and contingent exposures and non-performing loans and advances to credit institutions and fixed income.

Thousands of Euros and %		Dec-20	Dec-19	Dec-18
Numerator	(a) NPL provisions	3,613,318	3,491,313	4,593,197
Denominator	(b) Non-performing exposures	6,213,163	6,465,461	8,415,700
(a)/(b)	= NPL coverage ratio (%)	58.2%	54.0%	54.6%

5.4.- Liquidity

• Commercial gap

Definition: a metric used to measure the difference between loans granted to customers and deposits taken from customers.

Relevance: a metric commonly used by financial institutions to measure the level of funding of loans and receivables with customer deposits.

Calculation: the difference between net loans and advances to customers and the sum of customer deposits on the balance sheet plus funds raised through second-floor loans received from the EIB and ICO. Reverse repurchase agreements are subtracted from the balance of loans and advances to customers, and repurchase agreements and singular covered bonds are subtracted from customer deposits.

Thousands of Euros		Dec-20	Dec-19	Dec-18
A	Loans and advances to customers (a)+(b)+(c)	120,825,804	117,428,869	118,281,319
(a)	Loans and advances to customers (non-trading financial assets)	11,192	11,255	9,161
(b)	Loans and advances to customers (financial assets at amortised cost)	120,994,271	117,433,011	118,285,776
(c)	Reverse repurchase agreements	(179,659)	(15,397)	(13,618)
B	Customer deposits and second-floor funds (d)+(e)+(f)+(g)	127,536,166	123,791,654	123,951,227
(d)	Deposits from customers	128,459,531	124,784,736	126,319,476
(e)	Repurchase agreements	(48,025)	(45,526)	(43,954)
(f)	Singular covered bonds	(4,817,108)	(5,235,025)	(6,247,854)
(g)	Funds for second-floor credit facilities received from the EIB and ICO	3,941,768	4,287,469	3,923,559
A-B	= Commercial gap	(6,710,362)	(6,362,785)	(5,669,908)

• Loan to deposits (LTD)

Definition: a metric used to measure the relationship between loans granted to customers and deposits taken from customers.

Relevance: a metric commonly used by financial institutions to measure the level of funding of loans and receivables with customer deposits.

Calculation: net loans and advances to customers divided by the sum of customer deposits on the balance sheet plus funds raised through second-floor loans received from the EIB and ICO. Reverse repurchase agreements are subtracted from the balance of loans and advances to customers, and repurchase agreements are subtracted from customer deposits.

Thousands of Euros and %		Dec-20	Dec-19	Dec-18
Numerator	A Loans and advances to customers (a)+(b)+(c)	120,825,804	117,428,869	118,281,319
(a)	Loans and advances to customers (non-trading financial assets)	11,192	11,255	9,161
(b)	Loans and advances to customers (financial assets at amortised cost)	120,994,271	117,433,011	118,285,776
(c)	Reverse repurchase agreements	(179,659)	(15,397)	(13,618)
Denominator	B Customer deposits and second-floor funds (d)+(e)+(f)	132,353,274	129,026,679	130,199,081
(d)	Deposits from customers	128,459,531	124,784,736	126,319,476
(e)	Repurchase agreements	(48,025)	(45,526)	(43,954)
(f)	Funds for second-floor credit facilities received from the EIB and ICO	3,941,768	4,287,469	3,923,559
A/B	= LTD ratio (%)	91.3%	91.0%	90.8%

5.5.- Share information

• Market capitalisation

Definition: economic metric indicating the total value of all shares of a listed company or financial institution.

Relevance: a metric that reflects the equity value of the company in the market which, unlike book value, fluctuates in line with the supply and demand of the shares in the market.

Calculation: the number of shares at the period-end times the share price at the period-end.

		Dec-20	Dec-19	Dec-18
(a)	Number of shares at period-end (million)	3,070	3,070	3,085
(b)	Share price at period-end (Euros)	1.45	1.90	2.56
(a)*(b)	= Market capitalisation (millions of Euros)	4,448	5,840	7,898

- Earnings per share**

Definition: earnings per share (EPS) is the portion of profit attributable to each share of a company or financial institution.

Relevance: earnings per share is one of the most widely used measures in the financial and business sector to assess the returns for the company's or financial institution's shareholders.

Calculation: profit or loss attributable to owners of the parent (numerator) divided by the number of shares outstanding at the period end (denominator). Where the metric is calculated at a date before the end of the reporting period, the numerator is annualised.

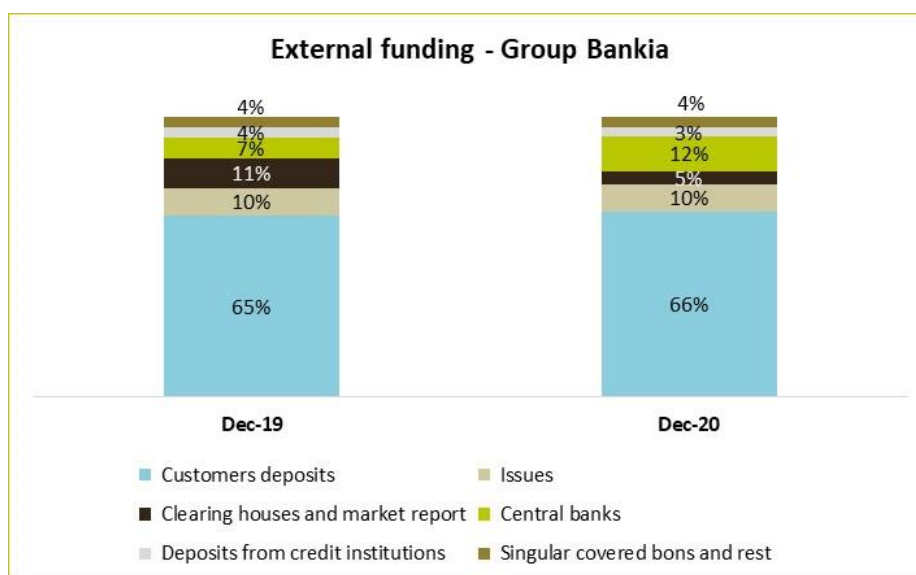
		Dec-20	Dec-19	Dec-18
Numerator	(a) Profit or loss attributable to owners of the parent (millions of Euros)	230	541	703
Denominator	(b) Number of shares at period-end (million)	3,070	3,070	3,085
(a)/(b)	= Earnings per share (Euros)	0.07	0.18	0.23

6.- FINANCING AND LIQUIDITY STRUCTURE

Notes 3.2 and 3.3 to the consolidated annual accounts for the year ended 31 December 2020 detail the Bankia Group's liquidity management policies and include information on the maturities of financial assets and liabilities which enables the liquidity balance to be projected at different points in time. Accordingly, the changes in the main liquidity indicators and sources of funding in 2020 will be discussed under this heading.

The Group strives to maintain a long-term financing structure that is in line with the liquidity of its assets; the maturity profile should be compatible with the generation of stable, recurring cash flows.

Based on the retail business model underpinning the banking activity, the Bankia Group's main funding source is deposits from retail customers, which have fully covered net loans and advances to other debtors at the end of 2020. The funds obtained through customer deposits are complemented by wholesale funding focused on the medium and long term (issues), repos arranged in the market, the Group's balances with the ECB and retail issues (one-off non-marketable mortgage-backed securities included under customer deposits), and other sources of financing.



In 2020, the liquidity attracted by the Bankia Group through external sources of funding increased by EUR 1,894 million compared to the end of December 2019, as described in the following table:

SOURCES OF FINANCING - BANKIA GROUP

(thousands of Euros)	Dec-20	Dec-19	Variation vs. Dec -19		% of total	
			Amount	%	Dec-20	Dec-19
Strict customer deposits	123,594,398	119,504,185	4,090,213	3.4%	66.1%	64.5%
General government	5,443,813	4,778,218	665,595	13.9%	2.9%	2.6%
Other financial corporations	6,713,510	7,328,297	(614,787)	(8.4%)	3.6%	4.0%
Current accounts	5,231,087	4,926,023	305,064	6.2%	2.8%	2.7%
Time deposits	1,482,423	2,402,274	(919,851)	(38.3%)	0.8%	1.3%
Non-financial corporations	15,126,091	13,334,595	1,791,496	13.4%	8.1%	7.2%
Current accounts	14,849,927	12,167,650	2,682,277	22.0%	7.9%	6.6%
Time deposits	276,164	1,166,945	(890,781)	(76.3%)	0.1%	0.6%
Households	96,310,984	94,063,075	2,247,909	2.4%	51.5%	50.8%
Current accounts	76,051,254	67,515,663	8,535,591	12.6%	40.7%	36.5%
Time deposits	20,259,730	26,547,412	(6,287,682)	(23.7%)	10.8%	14.3%
Wholesaler funding	24,378,734	25,547,133	(1,168,399)	(4.6%)	13.0%	13.8%
Deposits from credit institutions ⁽¹⁾	5,941,940	6,867,424	(925,484)	(13.5%)	3.2%	3.7%
Debt securities issued	18,436,794	18,679,709	(242,915)	(1.3%)	9.9%	10.1%
Singular covered bonds	4,817,108	5,235,025	(417,917)	(8.0%)	2.6%	2.8%
Repos	8,940,130	19,638,587	(10,698,457)	(54.5%)	4.8%	10.6%
Central banks	22,899,832	13,808,756	9,091,076	65.8%	12.2%	7.5%
Other	2,439,672	1,442,568	997,104	69.1%	1.3%	0.8%
Total external funding sources	187,069,874	185,176,254	1,893,620	1.0%	100.0%	100.0%

(1) Includes interbank deposits, collateral posted and other deposits from credit institutions.

Customer deposits ("strict deposits", which exclude repurchase agreements and one-off non-marketable mortgage-backed securities) totalled EUR 123,594 million, up EUR 4,090 million (+3.4%) in the year, both in companies, which have deposited part of the liquidity available to deal with the effects of COVID-19, and in households, as the drop in activity and the economic uncertainty derived from the pandemic have led to greater savings. As a result of this increase, at the end of December 2020, strict customer deposits accounted for 66.1% of the financing mix on the Group's balance sheet, compared to 64.5% in December 2019.

The related breakdown is as follows: (i) 51.5% households; (ii) 8.1% non-financial corporations; (iii) 3.6% other financial institutions; and (iv) 2.9% public-sector deposits.

In light of the crisis triggered by the COVID-19 pandemic and the measures adopted by the regulatory bodies to mitigate its impacts, Bankia has taken the maximum capacity of the ECB's TLTRO III (EUR 22,919 million), meaning that financing from central banks has increased by EUR 9,091 million (+65.8%) since December 2019, up to EUR 22,900 million in December 2020. Accordingly, the weight of central banks in the Bankia Group's financing structure has risen to account for 12.2% of debt, compared to 7.5% in December 2019. Currently, all the central bank financing that the Bankia Group receives is from TLTRO III auctions.

The Group's wholesale funding stood at EUR 24,379 million, representing 13.0% of external funding at the end of 2020 (13.8% in December 2019), and comprising debt securities and deposits from credit institutions.

Repos arranged through clearing houses and in the market with other institutions totalled EUR 8,940 million, down EUR 10,698 million (-54.5%) in the year, which is linked to the greater volume of financing obtained from the ECB. At the end of 2020, repo financing represented 4.8% of the Bankia Group's external funding, compared to 10.6% at the end of 2019.

Lastly, one-off non-marketable mortgage-backed securities disclosed within customer deposits and other funding sources reached to a joint amount of EUR 7,257 million in 2020. They are a residual component of the Group's funding structure, representing 2.6% and 1.3%, respectively, of the Bankia Group's borrowings.

Core liquidity metrics remain at comfortable levels. The commercial gap, i.e. the difference between loans (excluding reverse repos) and customer deposits (excluding repos and one-off non-marketable mortgage-backed securities), plus funds received from the EIB and ICO to extend second-floor loans, was negative EUR 6,710 million at the end of December 2020, compared to negative EUR 6,363 million at the end of December 2019. The "Loan to deposits" or LTD ratio (net loans less reverse repos divided by customer deposits less repos plus funds received for second-floor loans) ended 2020 at 91.3% (91% at December 2019), reflecting the Group's funding model through customer deposits.

The Group continues to have a comfortable debt maturity profile, with issues maturing in the amount of EUR 2,235 million in 2021 and EUR 4,515 million in 2022, which are mostly covered bonds (EUR 5,260 million). To cover these maturities and scheduled redemptions in the coming years, the Bankia Group had EUR 35,048 million of available liquid assets at the end of December 2020, equivalent to 16.7% of the Group's assets and which covers all its debt maturities (EUR 22,120 million).

Therefore, with debt maturities covered in the coming quarters, the Bankia Group has a great deal of flexibility to meet its short- and medium-term funding needs, maintaining a solid balance sheet structure.

LIQUIDITY RESERVE - BANKIA GROUP

(millions of euros)	Dec-20	Dec-19	Variation vs. Dec -19	
			Amount	%
Highly liquid available assets ⁽¹⁾	19,050	15,538	3,512	22.6%
Undrawn amount on the facility	5,883	6,161	(278)	(4.5%)
Cash ⁽²⁾	10,115	11,418	(1,303)	(11.4%)
TOTAL (*)	35,048	33,117	1,931	5.8%

(1) Market value considering the ECB haircut.

(2) Notes and coins plus balances at central banks less the amount of minimum reserves.

7.- CAPITAL MANAGEMENT, SOLVENCY AND LEVERAGE

Capital management, aimed at all times to comply with minimum regulatory requirements and with the risk appetite target or level established by the Group, is one of the basic pillars of the Group's Corporate Risk Appetite and Tolerance Framework.

Since the entry into force of the solvency requirements known as BIS III on 1 January 2014, which then marked a change to the preceding framework and entailed tougher quality and minimum capital requirements, there have been ongoing regulatory changes impacting the solvency of financial institutions. By adequately managing its capital, the Bankia Group has been able to bolster its solvency and minimise the impact of these regulatory changes.

Note 4 to Bankia Group's consolidated annual accounts describes the capital management targets and policies, their effect on the Capital Planning process and their impact on the entity's Risk Appetite Framework. It also details developments in the applicable regulations for calculating solvency ratios and metrics, leverage and MREL. Therefore, from a management perspective, this section looks at trends in solvency and leverage in 2020 and the main components that have affected their composition and performance, including the impacts derived from the main regulatory changes introduced in response to the COVID-19 crisis and the measures taken by Bankia to mitigate the impact on the Group's solvency ratios.

Changes in regulatory requirements and measures taken by Bankia in the context of the crisis caused by the COVID-19 pandemic

On 24 June 2020 Regulation (EU) 2020/873 of the European Parliament and of the Council was published, which amended the CRR and CRR II in respect of certain adaptations made in response to the COVID-19 pandemic, notably:

- The date of application of some of the more favourable treatments introduced by the CRR II has been brought forward: prudential treatment of certain software assets, the treatment of certain loans backed by pensions or salaries, application of a revised supporting factor for loans to small and medium-sized enterprises (SMEs) (the "SME supporting factor"), and a new adjustment to own funds requirements for credit risk for exposures to entities that operate or finance physical structures or facilities, systems and networks that provide or support essential public services (the "infrastructure supporting factor").
- The date of application for the leverage ratio buffer requirement for global systemically important institutions has been deferred to 1 January 2023 and the possibility of excluding certain exposures to central banks from the calculation of the exposure measure laid down in article 429 of the CRR has been introduced.
- More flexibility is permitted in the application of Regulation (EU) No 2017/2395 of the European Parliament and of the Council of 12 December 2017 as regards transitional arrangements for mitigating the impact of IFRS 9, in order to limit the possible volatility of regulatory capital that might occur if the COVID-19 pandemic results in a significant increase in expected credit loss provisions. Institutions are allowed to add back to their Common Equity Tier 1 capital any increase in new expected credit loss provisions for unimpaired credit exposures (Stage 1 – Performing exposures and Stage 2 – Performing exposures under special monitoring) that they recognise in 2020 and 2021.
- A temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income is established, permitting the exclusion of 100% of the accumulated amount of such unrealised gains and losses arising since 31 December 2019 from the calculation of Common Equity Tier 1 in 2020 and applying a transitional timetable for their full inclusion in 2023.
- Additional flexibility is allowed for competent authorities to mitigate the effects of market volatility in 2020 and 2021 on the internal calculation models for own funds requirements in relation to market risk.

Furthermore, on 12 March 2020 the ECB published a raft of measures to firm up the resilience of institutions in the current climate, allowing institutions to temporarily operate below the minimum requirements of Pillar II Guidance and the capital conservation buffer. Moreover, the entry into force of article 104 a) of the CRR II was brought forward, allowing institutions to cover the minimum requirements of the Pillar II Requirement not only with Common Equity Tier 1 capital, but also with Additional Tier 1 capital and Tier 2 capital.

In the context of the regulatory changes caused by the COVID-19 crisis, the Bankia Group has adopted the following measures to mitigate the pandemic's impact on the Group's solvency:

- Following the supervisor's recommendations, on 17 July 2020 Bankia Group asked to avail of the option to phase in the initial impact on own funds of the implementation of IFRS 9 provided for in Regulation (EU) 2017/2395 of the European Parliament and of the Council, of 12 December 2017, even though it made no such request on 1 January 2018, having received authorisation from the supervisor in August.
- It also communicated its decision to apply the transitional provisions of Regulation (EU) 2020/873 of the European Parliament and of the Council, of 24 June 2020, amending article 473 bis of the CRR and allowing institutions to add back to their Common Equity Tier I capital the impact of any increase in new expected credit loss provisions that they recognise in 2020 and 2021.
- On 17 July 2020 the Bankia Group informed the supervisor of its intention to avail of the option provided for in Regulation (EU) 2020/873 of the European Parliament and of the Council, of 24 June 2020, in respect of the amendment to article 468 of the CRR, which allows for the temporary treatment of unrealised gains and losses arising since 31 December 2019 on portfolios of debt instruments measured at fair value, corresponding to exposures to central governments, regional governments or local authorities, permitting their exclusion from common equity tier 1 capital.

Solvency levels

In December 2019, the European Central Bank notified the Bankia Group the capital requirements that have been applicable to it in 2020 and continue to apply in 2021, maintaining the 2019 levels: a minimum Common Equity Tier I ratio of 9.25% and a minimum Total Capital ratio of 12.75%, both measured in relation to its transitional (phase-in) regulatory capital. These thresholds include the minimum required under Pillar I (4.5% in terms of Common Equity Tier 1 capital and 8% at the Total Capital level), as well as the Pillar II requirement (2%) and the combined buffer requirement applicable to the Group (2.75%). Following the application of the aforementioned article 104 a) of the CRD V, in 2020 the minimum CET1 requirement was 8.375% and the minimum Total Capital requirement remained at 12.75%.

In December 2020, the Bankia Group reached a Common Equity Tier 1 BIS III Phase in ratio of 17.30% and a Total Capital BIS III Phase in ratio of 22.01%. These capital levels amount to a surplus of EUR 6,006 million at Common Equity Tier 1 level and EUR 6,228 million at Total Capital level in respect of the regulatory minimum requirements of 8.375% and 12.750%, respectively, as shown in the following table:

BANKIA GROUP - Basel III solvency

Eligible capital (thousands of Euros and %)	December 2020 ^{(1) (2)}		December 2019 ⁽¹⁾	
Common Equity Tier 1 (€ millions and %)	11,639,587	17.30%	11,120,019	14.32%
Tier 1 capital	12,889,587	19.21%	12,370,019	15.93%
Tier 2 capital	1,915,092	2.85%	1,672,270	2.15%
Total BIS III Capital	14,804,679	22.06%	14,042,289	18.09%
Risk-weighted assets BIS III	Dec. 2020 ^{(1) (2)}		Dec. 2019 ¹	
Credit risk (including CVA)	61,185,266		70,990,148	
Operational risk	5,390,300		5,564,450	
Market risk	689,688		1,080,319	
Total risk-weighted assets BIS III	67,265,254		77,634,917	
Surplus/(Shortfall) on minimum regulatory requirement	December 2020 ^{(1) (2)}		December 2019 ⁽¹⁾	
		Minimum		Minimum
Surplus Common Equity Tier 1 BIS III ⁽³⁾	6,006,122	8.375%	3,938,788	9.250%
Surplus Total Capital BIS III	6,228,360	12.750%	4,143,836	12.750%

(1) Includes the profit attributed to the Group earmarked for reserves.

(2) Estimated data at 31/12/2020.

(3) In December 2020 the minimum regulatory CET-1 notified by the supervisor (9.25%) was adjusted, and stood at 8.38% after applying article 104 a) of the CRD V Directive.

In 2020, the Group's phase-in Common Equity Tier 1 ratio of 17.30% is higher than the 14.32% reached in December 2019. The main impacts of this change in the phase-in Common Equity Tier 1 capital are as follows:

- 26 basis points due to the timing effect associated with the deduction of net tax credits.
- +13 basis points due to the increase in Common Equity Tier 1 capital, mainly owing to the contribution of profit attributed to the Group (+EUR 230 million), not reflecting a deduction for dividend payments in 2020.
- +219 basis points due to lower RWAs, primarily as a result of regulatory impacts related to credit risk, such as the approval of internal models to calculate the RWAs of Bankia's mortgage portfolio and, to a lesser extent, the early application of the CRR II as regards the SMEs correction factor, as well as the adjustment for exposures with companies that finance or manage essential infrastructure or public services.
- +28 basis points due to the entry into force in December of the prudential treatment of intangible software assets provided for in Regulation (EU) 2020/873 of 24 June (CRR II).
- +64 basis points due to the application of flexible measures approved by Regulation (EU) 2020/873 as a result of COVID-19, in respect of the transitional timetable for the implementation of IFRS 9, authorised by the supervisor, and the option to temporarily exclude from capital the changes in unrealised gains and losses on the sovereign portfolio recognised at fair value from 31 December 2019 onwards.

As a result of all the aforementioned effects, at Total Capital Phase In level, in December 2020 the Bankia Group increased the Total Capital ratio by +392 basis points to 22.01%.

Shown below is a reconciliation of equity on the balance sheet to regulatory capital, including the net dividend income for the year earmarked for reserves.

BANKIA GROUP - Reconciliation of equity and eligible capital under BIS III

Eligible items (thousands of Euros and %)	Dec. 2020 ^{(1) (2)}	Dec. 2019 ⁽¹⁾	Variation	% Variation
Own funds	12,932,347	13,141,770	(209,423)	(1.6%)
Accumulated other comprehensive income	145,339	180,002	(34,663)	(19.3%)
Minority interests	2,547	13,325	(10,778)	(80.9%)
Total equity (public balance sheet)	13,080,233	13,335,097	(254,864)	(1.9%)
Adjustment of differences between public and regulatory balance sheets	-	(2)	2	-
Total equity (regulatory balance sheet)	13,080,233	13,335,095	(254,862)	(1.9%)
Non-eligible equity items	(69,533)	(51,533)	(18,000)	34.9%
Accumulated other comprehensive income not eligible as CET-1	(53,960)	(26,048)	(27,912)	107.2%
Ineligible minority interests	(2,547)	(13,329)	10,782	(80.9%)
Regulatory own share adjustment	(13,026)	(12,156)	(870)	7.2%
Other equity temporary adjustments ⁽³⁾	421,471	-	421,471	-
Capital deductions	(1,792,584)	(2,163,543)	370,959	(17.1%)
Intangible assets and other deductions (regulatory balance sheet)	(448,944)	(680,601)	231,657	(34.0%)
Deferred tax assets	(1,321,209)	(1,089,172)	(232,037)	21.3%
Valuation adjustments due to prudent requirements (AVA)	(22,431)	(38,442)	16,011	(41.7%)
Dividends	-	(355,328)	355,328	(100.0%)
Common Equity Tier 1	11,639,587	11,120,019	519,568	4.7%
Additional Tier 1 capital	1,250,000	1,250,000	-	-
Tier 2 capital	1,915,092	1,672,270	242,822	14.5%
TOTAL REGULATORY CAPITAL	14,804,679	14,042,289	762,390	5.4%

(1) Includes the profit attributed to the Group earmarked for reserves excluding any dividend payments in 2020.

(2) Estimated data at 31/12/2020.

(3) Includes temporary adjustments under Regulation (EU) 2020/873 in response to the COVID-19 pandemic: phasing-in of the impact related to IFRS 9 and temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income

The minimum capital requirements cover credit, currency, market and operational risks. At 31 December 2020, the capital requirements for credit risk, including equities and CVA, amounted to EUR 4,895 million (EUR 61,185 million for risk-weighted assets). At present, the requirements for credit risk are calculated using both the standardised and internal ratings-based approaches. Requirements for currency and market risk have been calculated using internal calculation models, which were under review. Therefore, until the models were finally approved in November 2020, the risk-weighted assets (RWA) included an increase for market risk related to the calculation model and not to market activity. At 31 December 2020, the capital requirements for this concept amounted to EUR 55 million (EUR 690 million for risk-weighted assets). Finally, the Bankia Group uses the standardised

approach to calculate the capital requirements for operational risk, which it updates once per year, totalling EUR 431 million at 31 December 2020 (EUR 5,390 million for risk-weighted assets)

Leverage ratio

The leverage ratio was implemented by the December 2010 Capital Framework of the Basel Committee on Banking Supervision (BCBS), which introduced this new metric as a supplementary ratio to solvency requirements but unrelated to risk measurement with the aim of including the leverage ratio as a Pillar I requirement. The EU Banking Reforms, which came into force on 27 June 2019 (CRR II), established from June 2021 onwards a binding leverage ratio requirement of 3% of tier 1 capital for all banks and an additional buffer requirement for global systemically important banks (the application of which has since been delayed as indicated previously).

With respect to the changes in regulatory requirements approved by regulatory bodies in the context of the crisis caused by the COVID-19 pandemic, since September 2020, the Bankia Group has availed of the option set out in Regulation (EU) 2020/873 of the European Parliament and of the Council of 24 June 2020 with regard to the temporary exclusion for leverage ratio purposes of certain exposures to central banks, which has had an impact on the leverage ratio of +33 basis points.

At 31 December 2020 the Bankia Group's leverage ratio (phase-in) stood at 6.32%, above the 3% minimum requirement. This level represents an increase of +43 basis points compared to December 2019, which is primarily driven by the rise in Tier 1 capital (+25 basis points), the lower exposure of items on the balance sheet (+28 basis points, mainly due to the aforementioned temporary exclusion of exposures to central banks), which have offset the higher exposure to off-balance sheet items (-9 basis points).

The following table provides a breakdown of the leverage ratio at 31 December 2020 and for comparative purposes at 31 December 2019, as well as a reconciliation of total assets on the public balance sheet and exposure for the purposes of leverage:

BANKIA GROUP - Leverage ratio

Items (thousands of Euros and %)	Dec. 2020 ^{(1) (2)}	Dec. 2019 ⁽¹⁾
Tier 1 capital	12,889,587	12,370,019
Exposure	203,971,300	210,098,403
Leverage ratio	6.32%	5.89%
Reconciliation between public balance sheet and exposure for leverage purposes		
Total assets on public balance sheet	209,841,949	208,468,273
(+/-) Adjustment of differences between public and regulatory balance sheets	38,429	4,138
(-) Items already deducted from Tier 1 capital	(1,755,405)	(1,773,081)
(-) On-balance sheet derivative assets	(9,137,895)	(9,017,546)
(+) Exposure on derivatives	(242,847)	643,951
(+) Additions in counterparty risk in securities financing transactions (SFTs)	4,592,315	3,475,213
(+) Off-balance sheet exposures (includes use of CCFs)	11,416,445	8,297,454
(+) Other temporary adjustments ⁽³⁾	(10,781,691)	-
Total leverage ratio exposure	203,971,300	210,098,403

(1) Includes the profit attributed to the Group earmarked for reserves excluding any dividend payments in 2020.

(2) Estimated data at 31/12/2020.

(3) Includes temporary adjustments under Regulation (EU) 2020/873 in response to the COVID-19 pandemic: phasing-in of the impact related to IFRS 9 and temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income

Minimum requirement for own funds and eligible liabilities (MREL)

Regarding the internal loss absorption mechanism provided for in Directive 2014/59/EU of the European Parliament and of the Council on bank recovery and resolution (the BRRD), a minimum requirement for own funds and eligible liabilities with loss-absorbing capacity called MREL (Minimum Required Eligible Liabilities) has been established, whereby institutions that are subject to the requirement must have liabilities with certain characteristics that favour the absorption of losses in the event of resolution of the institution. The EU Banking Reform Package introduces amendments to the BRRD, inter alia, in relation to the minimum subordination requirements of MREL eligible liabilities and the MDA (maximum distributable amounts) set in terms of MREL.

On 16 May 2019, the entity received formal notification from the Bank of Spain on the decision taken by the Single Resolution Board on its minimum requirement for own funds and eligible liabilities (MREL). According to this communication, from 1 July 2021 the Group will have to reach a minimum volume of own funds and eligible liabilities of 23.66% in terms of risk-weighted assets calculated at the end of the 2017 financial year. This MREL requirement, expressed in terms of total liabilities and own funds of the entity ("TLOF") would be 10.02%.

Thus, at 31 December 2020, the Bankia Group's MREL ratio, calculated according to the current eligibility criteria of the Single Resolution Board, amounts to 25.87% of the total risk-weighted assets, which represents a rise of +395 basis points compared to December 2019 due to the increase in eligible Total Capital and the decrease in RWAs in the year as a result of the various impacts described above. The application of flexible measures approved by Regulation (EU) 2020/873 as a result of COVID-19, in respect of the transitional timetable for the implementation of IFRS 9, authorised by the supervisor, and the option to temporarily exclude from capital the changes in unrealised gains and losses on the sovereign portfolio recognised at fair value from 31 December 2019 onwards, has had an impact of +67 basis points in terms of MREL.

BANKIA GROUP - MREL ratio		
Items (thousands of Euros and %)	Dec. 2020 ^{(1) (2)}	Dec. 2019 ⁽¹⁾
Total BIS III Capital	14,804,679	14,042,289
Liabilities eligible for MREL	2,599,385	2,975,882
Total own funds and eligible liabilities (MREL)	17,404,064	17,018,171
Total risk-weighted assets BIS III	67,265,254	77,634,917
MREL ratio/ RWAs (%)	25.87%	21.92%
<small>(1) Includes the profit attributed to the Group earmarked for reserves excluding any dividend payments in 2020.</small>		
<small>(2) Estimated data at 31/12/2020.</small>		

8.- RISK MANAGEMENT

Risk management is a strategic pillar in the Bankia Group. The primary objective of risk management is to safeguard the Group's financial stability and asset base, while creating value and developing the business in accordance with the risk tolerance and appetite levels set by the governing bodies. It involves the use of tools for measuring, controlling and monitoring the requested and authorised levels of risk, managing non-performing loans and recovering unpaid risks.

Note 3 to the Bankia Group's consolidated annual accounts at 31 December 2020 details the governing bodies responsible for supervising and controlling the Group's risks, as well as the general principles, organisational model, policies and methods for controlling and measuring the various risks to which the Group is subject as a result of its activity. Therefore, this section will discuss, in general terms, the result of the management and the main indicators that make it possible to assess the evolution of these risks in 2020.

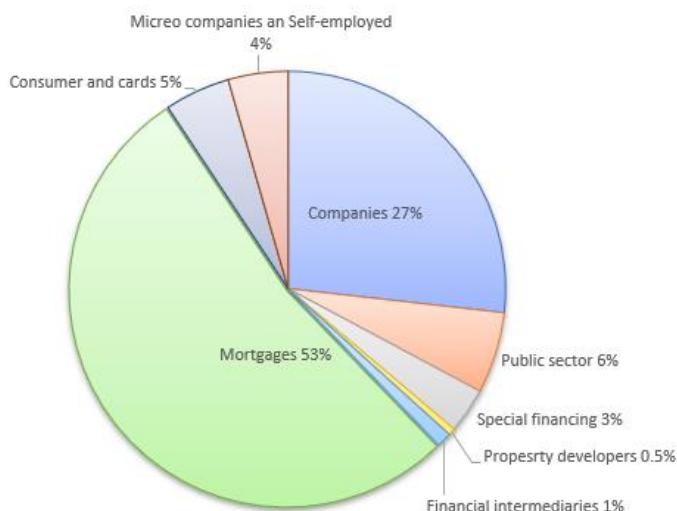
8.1.- Credit risk

Credit risk is defined as the risk that the Bankia Group will assume losses in the regular course of its banking business if its customers or counterparties fail to comply with their contractual obligations. Credit risk management is an end-to-end process, running from loan or credit approval to elimination of exposure, either at maturity or through recovery and sale of assets in the event of foreclosure upon default. It involves identifying, analysing, measuring, monitoring, integrating and valuing credit risk-bearing transactions on a differentiated basis for each segment of the Group's customers.

The variables used by the Bankia Group to measure credit risk are based on internal models: probability of default, exposure at default and loss given default (severity). These variables enable ex-ante analysis of the credit portfolio's risk profile by calculating the expected loss and economic capital required.

• Risk profile and asset composition

Given its activity and business model, the Bankia Group's risk profile shows far greater exposure to credit risk than the other risks to which its business is inherently exposed.



The main characteristics of the Group's credit risk profile and its performance in 2020 according to data from the audited portfolio (does not include positions in financial equities) are as follows:

- The fixed-income portfolio has increased by 2.2% (EUR 995 million) to stand at EUR 46,140 million (net of impairment) at December 2020.
- The distribution of loans and advances to customers shows a weighting of the retail segment of 62% compared to 38% for the wholesale segment.
- The property development portfolio accounts for 0.5% of total loans and receivables.
- The mortgage portfolio accounts for 53% of total loans and receivables. The second largest portfolio is Businesses, with a weighting of 27% of the total, followed by the portfolio of loans to public entities and institutions with a weighting of 6% of the total, consumer and cards with a share of 5% and loans to micro companies and self-employed individuals with a weighting of 4% of the total.
- At the December 2020 close, 36% of non-performing investments were classified as such according to subjective criteria or are in the cure period. This means that there is no past due debt in this portfolio that gives rise to an objective arrears situation or that a refinancing agreement has been reached with customers and there is, therefore, an apparent willingness to pay which must be properly verified.

The maturity profile of the loans and receivables portfolio is detailed in note 3.3 to the Bankia Group's consolidated annual accounts at 31 December 2020 (table of residual maturities). A significant portion of loans and advances to customers (43%) mature beyond five years given the large volume of home mortgage loans, which are generally for long periods.

The following table shows the distribution by portfolio of the Bankia Group's regulatory capital requirements and expected loss on credit exposure at 31 December 2020:

Segment (in millions of EUR)	Dec-20	
	Regulatory Capital	Expected Loss
Bodies	49.4	85.3
Banks and intermediaries	204.9	8.7
Companies	1,678.5	1,068.9
Property developers	90.5	71.9
Retail:	1,678.7	1,897.6
<i>Mortgages</i>	1,125.5	1,321.1
<i>Consumer</i>	241.2	221.9
<i>Cards</i>	116.6	61.9
<i>Micro companies and self-emp</i>	195.5	292.7
Equities	58.5	4.2
TOTAL	3,760.6	3,136.5

- Asset quality: trends in non-performing balances, arrears and coverage**

The Bankia Group proactively manages and anticipates credit risk with a view to containing the inflow of non-performing loans (NPLs) and maintaining NPL coverage. In this regard, the entity is continually monitoring the main credit risk indicators to anticipate the potential impacts stemming from COVID-19.

The control measures implemented, coupled with the growth in lending and the management of the portfolio over the course of the year, have contained the decline in the credit quality of the portfolio. Accordingly, the Group's **non-performing exposures** totalled EUR 6,213 million at the 2020 year-end, down 3.9% on December of the previous year (EUR 6,465 million). It should be noted that at the end of December 2020 the non-performing exposures figure includes non-performing loans and credits for a gross amount of EUR 306 million, which have been reclassified from non-current assets and disposal groups of items held for sale, since their sale did not materialise in 2020 nor is it expected to take place within one year of their classification as non-current assets held for sale in view of the current market circumstances (see Note 9.5 to the consolidated annual accounts on "Assets and Liabilities in a Disposal Group and Discontinued Operations").

As acknowledged by the various regulatory and supervisory bodies, at present it is difficult to ascertain the specific impact in the coming periods of the crisis caused by COVID-19 and the assistance measures implemented by governments and central banks, such as mortgage moratoriums, credit facilities and guarantees and other relief packages. However, in compliance with accounting standards (IFRS 9), which in the calculation of provisions include prospective macroeconomic information reflecting the future effects of changes in variables to which credit risk models are sensitive, in 2020 the Group recognised allowances for COVID-19 of EUR 490 million.

Bearing in mind the foregoing, the Bankia Group ended 2020 with an **NPL ratio** of 4.7%, down slightly on the 5% registered in December 2019, while **non-performing loans coverage** reached 58.2%, an increase of 4.2 percentage points over the year, which is explained by the recognition of the aforementioned provision for COVID-19.

With regard to refinanced transactions, at the end of December 2020 the Bankia Group had a portfolio of EUR 5,377 million in gross terms. 53.8% of refinanced loans were already classified as non-performing, with a coverage ratio of 33.4%.

NPLs AND COVERAGE - BANKIA GROUP

(Thousands of euros and %)	Dec-20 ⁽¹⁾	Dec-19 ⁽¹⁾	Variation vs. Dec -19	
			Amount	%
Non-performing balances	6,213,163	6,465,461	(252,298)	(3.9%)
Total risks	132,220,636	128,156,293	4,064,343	3.2%
NPL ratio ⁽²⁾	4.7%	5.0%	(0.3) p.p.	(6.9%)
Total provisions	3,613,318	3,491,313	122,005	3.5%
Coverage ratio	58.2%	54.0%	+4.2 p.p.	7.7%

(1) The NPL and coverage ratios exclude non-performing exposures transferred to non-current assets and disposal groups that have been classified as held for sale as indicated in Note 18.5 to the consolidated annual accounts at December 2020. Had these assets been included, the NPL ratio would stand at 4.7% in 2020 and 5.3% in 2019, whereas the coverage ratio would stand at 58.5% in 2020 and 52.8% in 2019.

(2) NPL ratio: non-performing balances over total risks.

• Credit risk of trading in derivatives

The Group is exposed to credit risk through its activity in financial markets, specifically its exposure to OTC (over the counter) derivatives. This exposure is called counterparty risk.

The method used to estimate counterparty risk entails calculating EAD ("exposure at default") as the sum of the current market exposure and the potential future exposure. This method aims to obtain the maximum expected loss for each transaction.

However, in order to mitigate most of these risks, the Bankia Group has tools including early redemption agreements (break clause), netting of credit and debit positions (netting) and collateralisation for the market value of the derivatives or offsetting of derivatives.

At the December 2020 close, there were 2,039 netting and 234 guarantee agreements (121 derivatives, 75 repos and 38 securities loans). At this date, the most significant figures in terms of quantifying activity in derivatives are as follows:

- Original or maximum exposure: EUR 19,855 million.
- Exposure applying mitigation techniques through netting: EUR 5,511 million.
- Net exposure after applying all mitigation techniques: EUR 1,454 million.

As shown, counterparty risk in derivatives trading is reduced by 92.68% by applying derivatives netting and guarantee agreements.

8.2.- Liquidity risk

Liquidity risk can be expressed as the probability of incurring losses through insufficient liquid resources to comply with the agreed payment obligations (both expected and unexpected) within a certain time horizon and having considered the possibility of the Group managing to liquidate its assets in reasonable time and price conditions.

Notes 3.2 and 3.3 to the Bankia Group's consolidated annual accounts for the year ended 31 December 2020 include information on the remaining maturities of the Group's issues, classified by financing instrument, and a breakdown of financial assets and liabilities by remaining contractual maturity at 31 December 2020 and 31 December 2019.

The Bankia Group's approach to monitoring liquidity risk is based on three cornerstones:

- The first one is the liquidity gap, classifying asset and liability transactions by term to maturity considering the residual maturity. The liquidity gap is calculated for the recurring retail business, as well as for the funding needs of the Group's structural portfolios.
- The second is the funding structure, identifying the relationship between short- and long-term funding and the diversification of the funding mix by asset type, counterparty and other categorisations. In this regard, the entity draws up an annual Financial Plan for both the short and medium term, which is evaluated as part of the liquidity adequacy self-assessment process, with protection of the balance sheet assets and liabilities and the main indicators of liquidity and financing risk. It has been reformulated and adapted to the new situation arising from COVID-19, ensuring sufficient liquidity from both an economic and regulatory standpoint.
- Thirdly, in keeping with the regulatory approach for stressed ratios, the Group uses metrics that enable it to anticipate the bank's liquidity risk profile in different time horizons of regulatory ratios.

Alongside the various metrics, the Group has a well-defined Contingency Plan, which identifies alert mechanisms and sets out the procedures to be followed if the plan needs to be activated. This is a framework for action that enables the prevention and management of liquidity tension events. The Liquidity Contingency Plan (LCP) sets out the committees in charge of monitoring and activating the LCP and the protocol for determining responsibilities, internal and external communication flows, and potential action plans to redirect the risk profile to within the Group's tolerance limits.

The LCP is backed by specific metrics, in the form of LCP monitoring alerts, and by complementary metrics to liquidity risk and regulatory funding indicators, LCR (Liquidity Coverage Ratio) and NSFR (Net Stable Funding Ratio). These ratios have built-in stress scenarios for the ability to maintain available liquidity and funding sources (wholesale and retail deposits, funding on capital markets) and allocate them (loan renewal, unprogrammed activation of contingent liquidity lines, etc.).

For the LCR, the scenario relates to a survival period of 30 days, and the regulatory assumptions underlying

the construction of the ratio are valid exclusively for this period. At 31 December 2020, the regulatory LCR ratio (195.22% for Bankia on a standalone basis) was at levels that are demonstrably higher than the regulatory requirements (100%).

Through the net stable funding ratio (NSFR), the Group draws up its funding strategy from a regulatory perspective. The NSFR is currently undergoing a review by the European Union and, in accordance with CRR II (Capital Requirements Regulation), it will become a prudential requirement from June 2021 onwards, with a requirement of at least 100%. At 31 December 2020, the NSFR (for Bankia on a standalone basis) stood at 128.83%, which was within the entity's risk limits and met the regulatory requirements.

8.3.-Market risk

Market risk arises from the possibility of incurring losses due to adverse changes in the market prices of financial instruments with which the Bankia Group operates. Limits are established in accordance with a number of metrics: value at risk (VaR) calculated using the historical simulation method, sensitivity, maximum loss (stop loss limit) and the size of the position.

The Financial Risk Control Directorate is independent of the business units and is integrated in the Corporate Risk Directorate, which performs the following functions with respect to market risk in trading: control and monitoring of positions with market risk and counterparty lines; daily calculation of the results of the various desks and portfolios; independent valuation of all market positions; periodic reporting on the various market risks to the pertinent committee; and, lastly, it plays a fundamental role in managing model risk in the valuation of financial instruments for own positions.

• Interest rate risk

Interest rate risk reflects the probability of incurring losses because of changes in the benchmark interest rates for asset and liability positions (or certain off-balance sheet items) that could have an impact on the stability of the Group's results. Rate fluctuations affect both the Group's net interest income in the short and medium term, and its economic value in the long term. The intensity of the impact depends, to a large extent, on the different structure of maturities and repricing of assets, liabilities

and off-balance-sheet transactions. Interest rate risk management is designed to lend stability to net interest income, maintaining levels of solvency that are appropriate for the Group's level of risk tolerance.

Trends in interest rates depend on certain factors that are beyond the Bankia Group's control, such as financial sector regulation, monetary policies applied by the ECB, and the political and international environment. In the current low-interest-rate environment, the entity maintains a balance sheet structure that is more sensitive to increases in interest rates on liabilities than on assets, with the flattening scenario defined by the EBA being the most negative from an economic value standpoint.

According to Bank of Spain regulations, the sensitivity of net interest income and equity value to parallel shifts in interest rates (currently ± 200 bps) is controlled. In addition, different sensitivity scenarios (EBA scenarios) are established based on implied market interest rates, comparing them to non-parallel shifts in yield curves that alter the slope of the various references of balance sheet items. Note 3.4 to the consolidated annual accounts ("Interest rate risk exposure") provides information at 31 December 2020 on the sensitivity analysis under the scenario analysis methodology for interest rate risk.

The Deputy General Directorate of Finance supports and guides the Assets and Liabilities Committee ("ALCO") in planning and controlling the parameters of the Bank's financial strategy and asset and liability structure. Control and monitoring is the responsibility of the Corporate Risk Directorate, which acts as an independent unit guaranteeing the appropriate separation between the management and risk control functions, as recommended by the Basel Committee on Banking Supervision. To this end, the Structural Risk Department, which is part of the Financial Risk Department, defines, calculates and monitors metrics related to structural risk. The calculation, proposal and information on the evolution of limits related to structural risk are also the responsibility of the Corporate Risk Directorate, although it is the Board of Directors, with the support of the Risk Advisory Committee (RAC), that is ultimately responsible for their approval and monitoring.

Each month, information on structural risk on the balance sheet is reported to the ALCO in terms of both economic value (sensitivities to different scenarios and VaR) and net interest income (financial margin projections in different interest rate scenarios for horizons of 1 and 3 years). At least quarterly, the Board of Directors is informed through the Risk Advisory Committee on the situation and monitoring of limits. Any excesses are reported immediately to the Board through the corresponding bodies. In addition, a portion of the information prepared for the ALCO is reported to the Global Risk Management Department for monitoring and reporting, along with other risks, to the entity's senior management.

- **Other market risks**

Other market risks arise from the possibility of incurring losses in value of positions in financial assets caused by changes in market risk factors other than interest rate risk (equity prices, foreign exchange rates or credit spreads). It stems from Treasury and Capital Markets positions and can be managed by arranging other financial instruments.

- **Market risk measurement and monitoring**

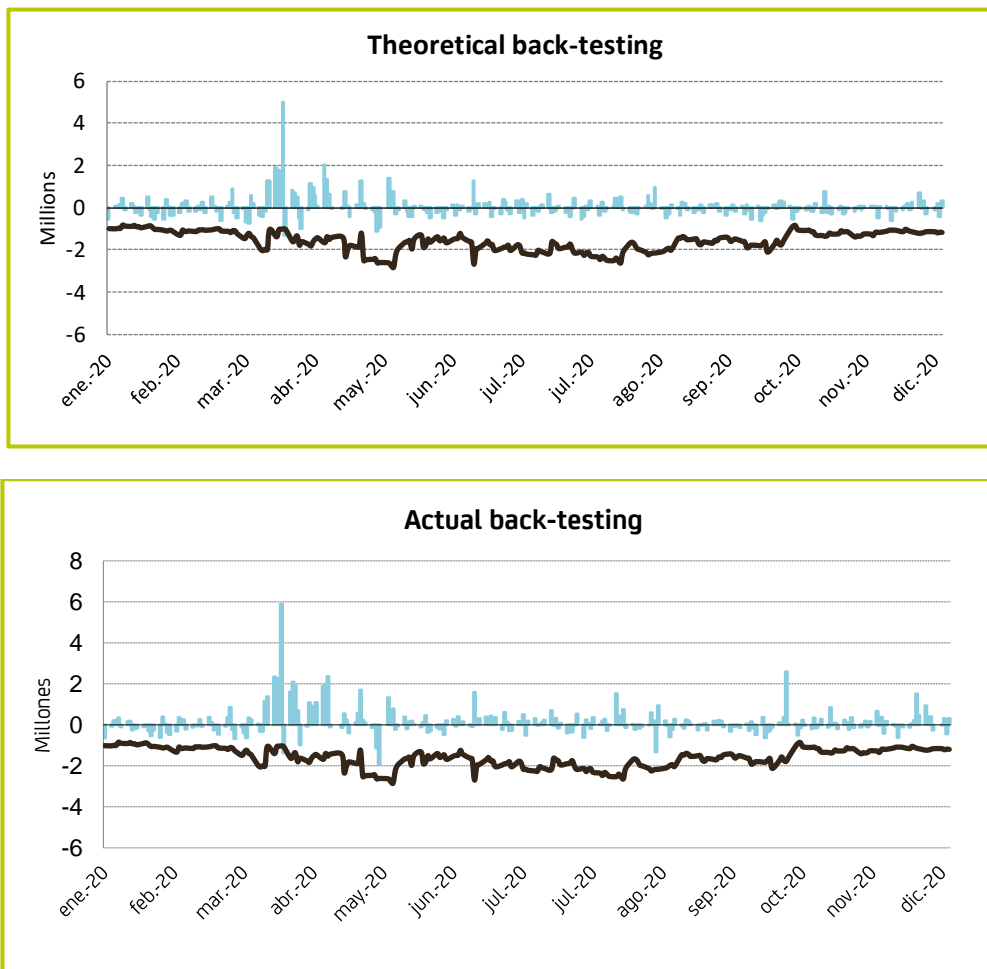
For market risk measurement, two metrics are used: VaR (value at risk), which provides a prediction of the maximum loss that can be incurred in a time interval with a certain level of confidence, and sensitivity, which expresses the impact on the valuation of financial instruments of the changes in various risk factors. These metrics are complemented by an analysis of scenarios, which consists of evaluating the economic impact of extreme movements in market factors on trading activity. Control of market risk is based on a system of limits established based on maximum exposure to market risk, which are approved annually by senior executives and distributed across the various business areas and centres.

a) Value at risk (VaR) and back-testing

VaR is measured by the historical simulation method using a 99% confidence level and a time horizon of one day, with at least one year of observations of market data. The accuracy of the model is verified daily through subsequent controls (back-testing). The exercise compares actual losses with the estimated loss measured using VaR. As required by regulations, two tests are conducted, one applying hypothetical changes in the value of the portfolio by comparing the daily VaR with the results

obtained, without considering changes in the positions of the portfolio, and one applying actual changes comparing daily VaR with net daily results excluding commissions.

The tests carried out in 2020 confirm the effective operation of the model used by the Bankia Group to measure VaR in accordance with the assumptions used, with no excesses in the period.



The scope of authorisation by the Bank of Spain of internal capital models lies in the measurement of market risk of the trading portfolio and currency risk. The regulatory capital figure by internal model is calculated as the linear sum of the value at risk (VaR), stressed value at risk (sVaR) and incremental risk (IRC) of regulatory capital.

- Value at risk. VaR is measured by the historical simulation method using a 99% confidence level and a time horizon of one day. A time window of 250 daily observations is used. On a daily basis, two calculations of VaR are performed. One applies an exponential decay factor that lends greater weight to observations nearer the date of the calculation. The other applies the same weight to all observations. The total value at risk figure is calculated conservatively as the sum of the VaR by risk factor (interest rate, exchange rate, equities, credit margins, commodity prices and volatility of the foregoing).
- Stressed value at risk. Stressed value at risk (sVaR) uses the same calculation methodology as the VaR, with two differences: the observation period must include a period of market stress and no exponential weights are applied to observations. The stress period is determined for the entire portfolio as the period that provides the highest VaR figure, calculated as the sum of the values at risk by factor.
- Incremental risk. The methodology for calculating incremental risk (IRC) considers the risk of default and the risk of migration of the interest rate products envisaged for the calculation of the specific risk within the VaR. It is based on measurements of the distribution of losses. The distribution is generated by the Monte Carlo simulation based on the risk

parameters deriving from the internal credit risk model (IRB). The IRC is calculated using a confidence level of 99.9%, with a constant level of risk over a time horizon of one year and a liquidity horizon of one year.

b) Sensitivity

Sensitivity quantifies changes in the economic value of a portfolio due to fixed and determined movements of the variables affecting this value.

In the case of non-linear movements, such as derivatives activities, sensitivity analysis is supported by an evaluation of other risk parameters, such as sensitivity to movements in the price of the underlying (delta and gamma), volatility (vega), time (theta) and interest rate (rho). For share or index options, elasticity to changes in dividend yield is calculated. Sensitivity analysis by tranche is also used to measure the impact of non-parallel movements in the term structures of interest rates or volatilities, and to obtain the distribution of risk in each tranche.

c) Stress testing

Periodically, stress testing is performed to quantify the economic impact of extreme movements in market factors on the portfolio. Sensitivity, VaR and IRC measurements are supported by stress testing, applying different types of scenarios:

- Historical scenarios: scenarios built based on movements observed in previous crises (e.g. Asian crisis of 1998, the tech bubble of 2000/2001, the financial crisis of 2007/2008). These scenarios are reviewed annually to reflect the key events occurring in the year.
- Macroeconomic scenarios: on the basis of the scenarios established by the EBA in their stress tests conducted every two years.
- Specific IRC scenarios: designed to assess the impact on the measurement of slight changes in the parameters used to calculate the IRC. These scenarios are based on assessing the parameters and stress scenarios that have a bearing on the measurement.

• Trends and distribution of market risk in 2020

During 2020, the Bankia Group maintained an average VaR of EUR 1.48 million, with a maximum of EUR 2.87 million and a minimum of EUR 0.76 million.

VaR	Trading portfolio (millions of euros)
Average	1.48
Maximum	2.87
Minimum	0.76

Distribution of VaR by risk category (millions of euros)				
Type of risk	One-off	Average	Maximum	Minimum
Interest	0.56	0.66	1.43	0.31
Equities	0.09	0.12	0.51	0.02
Change	0.22	0.23	0.45	0.12
Credit	0.19	0.47	1.77	0.05

- **Derivatives activity**

The Bankia Group's trading in derivatives arises mainly from the management of market and interest rate risks, and from market making and distribution activities.

The risk of the derivatives trading activity measured in terms of VaR remains extremely low, as this activity is based on transactions with customers that are settled on the market using transactions of the opposite sign. The VaR values for 2020 are as follows:

VaR of derivatives activity <i>(millions of euros)</i>	Fixed income	Equities	Exchange rate	Total
Average	0.25	0.19	0.26	0.70
Maximum	1.15	0.70	1.29	1.75
Minimum	0.10	0.03	0.09	0.28

8.4.-Country risk

Country risk is defined as the risk of incurring losses on exposures with sovereigns or residents of a country due to reasons inherent to the country's sovereignty or economic situation; i.e. reasons other than normal commercial risk, including sovereign risk, transfer risk and other risks related to international financial activity (war, expropriation, nationalisation, etc.).

The Bankia Group's country risk management principles are grounded on criteria of maximum prudence, whereby this risk is assumed on a highly selective basis.

The Bankia Group's exposure to country risk at 31 December 2020 was marginal due to the largely domestic nature of its operations, recognising a provision in this connection of EUR 2 million.

8.5.- Operational risks

- **Customer concentration risk**

Bankia is subject to Bank of Spain concentration limits, such that the exposure to any single non-consolidated economic group or borrower must not exceed 25% of eligible capital for borrowers and external economic groups. In this respect, the Group regularly monitors large exposures with customers, which are reported periodically to the Bank of Spain.

The Group uses a set of tools to analyse and monitor the concentration of risks. First, as part of the calculation of economic capital, it identifies the component of specific economic capital as the difference between systemic economic capital (assuming maximum diversification) and total economic capital, which includes the effect of the concentration. This component enables a direct measure of concentration risk to be obtained. An approach similar to that used by ratings agencies is applied, paying attention to the weight of the main risks with respect to the volume of capital and income-generation ability.

At 31 December 2020, there were no exposures that exceeded the maximum concentration risk limits allowed by Bank of Spain.

- **Operational risk**

Operational risk is the risk of loss due to inadequate or failed processes, people and internal systems of the Group or from external events. This definition includes legal risk but excludes strategic risk and reputational risk.

The Bankia Group has the following operational risk management objectives:

- The Group's operational and IT risk management not only covers the recognition of loss events and accounting of the losses, but also promotes control to minimise the potential negative impacts through continuous improvement to processes and the strengthening of operating controls.
- Promote the implementation of more relevant operational risk mitigation plans as set out in the Risk Appetite Framework.
- Define and approve the policies and procedures for the management, control and oversight of this risk.
- Conduct regular reviews of management information.
- Approve and oversee implementation of operational and IT risk mitigation plans.
- Operational and IT risk management must be implemented throughout the entity to help achieve the institution's targets through the management, prevention and mitigation of the related risks.
- Maintain a control environment and culture that ensures that all groupings are aware of the risks to which they are exposed, establish an adequate control environment and assume the responsibilities in this respect.
- Supervise on an ongoing basis compliance with the entity's risk policies and procedures.
- Put in place procedures that guarantee compliance with current and future legal requirements.
- Guarantee that all internal risk information is duly documented and available to the oversight bodies and areas involved.

Operational risk control is overseen by the Non-Financial Risk Control Department, which is part of the Corporate Risk Directorate. The Non-Financial Risk Control Department takes responsibility for acting as the second line of defence in the management of IT and cyber security risk and has a specific Technological Risk Department.

The Operational and Technological Risk Committee, whose responsibilities include approving policies and methods, is the natural channel for senior executives' participation in operational risk management. It is an executive committee and meets on a monthly basis. At its meetings, the Committee addresses issues such as capital consumption, the evolution of real and expected losses, the monitoring of legal risk, the risks associated with using new channels, analyses of risks in outsourcing processes, and all actions taken in the operational and technological risk management process.

The capital requirement to cover operational risk is rooted in Basel II. European Regulation No. 575/2013 of the European Parliament and of the Council, of 26 June 2013 (CRR) regulates the treatment of this type of risk in the area of credit institutions.

The capital charge for operational risk is calculated once a year, after the accounting close. The Bankia Group uses the standardised approach to measure its operational risk. This approach requires the disaggregation of the relevant revenues of the past three reporting periods by business line and the application of a percentage to each, pursuant to regulations, in line with the risk associated with each one.

As set out in the regulations, based on the related risk, the Bankia Group's capital requirement for operational risk at year end 2020 amounted to EUR 431.2 million (EUR 445.2 million in 2019).

• **Changes in regulatory frameworks and regulatory risk**

The financial services industry is characterised by being tightly regulated. Bank operations are subject to specific regulation and the Group's operations are exposed to risks that could arise from changes in the regulatory framework.

Changes in the regulatory framework due to modifications in government policies, the banking union process or of any other type could give rise to new regulatory requirements that affect the Group's solvency levels, other capital indicators, the ability to generate future profit, business model, dividend policy and its capital and liability structure.

The Regulatory Monitoring Committee, composed of senior executives, identifies the potential impact and influence of regulatory changes on the entity, anticipating any adverse effect. The Committee pays special attention to certain areas, such as

business, accounting, risk management, solvency, liquidity, compliance and internal audit. It also establishes the most appropriate criteria for adapting the business model to the new regulatory paradigm, subsequently performing periodic and exhaustive monitoring of each project's adaptation to regulations.

Regulatory developments have been much more abundant since the entry into force in January 2014 of the new prudential requirements known as BIS III. For Europe, this consisted of Directive 2013/36/EU, of 26 June 2013 ("CRD IV") and Regulation (EU) 575/2013, of 26 June 2013 ("CRR"). Both CRD IV and CRR were amended in 2019 by various legislative packages of the European Parliament and the Council of the European Union, known as "CRD V" and "CRR II", aimed at strengthening the capital position of banks. These reforms came into force on 27 June 2019, with a phase-in period of up to 2 years for certain amendments.

In 2020, the main policy and regulatory milestones that have impacted the activity of the banking sector have occurred in response to the COVID-19 crisis. In this respect, the Spanish government has enacted various regulations to deal with the health crisis and its economic and social impact and to protect and revive employment and economic activity, both at national level and through certain measures at sector level, the most important of which are as follows:

- Royal Decree-Law 8/2020 of 17 March 2020, on extraordinary urgent measures to address the economic and social impact of COVID-19 ("RDL 8/2020") provided, inter alia, for a moratorium of three months (public or legislative moratorium) on the principal and interest payment of mortgage loan instalments for the acquisition of a principal residence and property relating to the economic activity of entrepreneurs and professionals for economically vulnerable people affected by COVID-19, as well as the approval of a line of State guarantees to support lending to companies and self-employed workers, the granting of which was subject to compliance with certain requirements. Managed by the Spanish Official Credit Institute (ICO), the line of State guarantees seek to ensure that new or renewed loans are secured by the State for a maximum period of up to five years.
- Royal Decree-Law 11/2020, of 31 March, on urgent complementary social and economic measures to deal with COVID-19 ("RDL 11/2020"), which completed the first raft of measures, extending the moratorium mechanism on payment of instalments to other types of financing, such as consumer credit. In addition, the line of State guarantees was extended to economically vulnerable households as a result of the COVID-19 crisis to provide financing to pay rent for their principal residence.
- Royal Decree-Law 25/2020 of 3 July 2020 on urgent measures to support economic recovery and employment, established a 12-month moratorium for borrowers, in financing transactions linked to tourism-related property who, after meeting certain conditions, have undergone financial difficulties as a result of COVID-19.
- Royal Decree-Law 26/2020, of 7 July, on economic reactivation measures to deal with the impact of COVID-19 in transport and housing, introduced measures for a six-month postponement of payments relating to loans, finance leases and operating leases that self-employed workers and companies engaging in road transport, and meeting a number of requirements, use to purchase vehicles.
- Royal Decree-Law 34/2020, of 17 November, on urgent measures to provide support for business solvency, the energy sector and in tax matters, brought in new measures aimed at mitigating the liquidity problems of businesses and self-employed professionals, thus maintaining the line of business solvency support provided for in the previous royal decrees. Such measures include the following:
 - The deadline for the granting of public guarantees to address the liquidity needs of self-employed workers and businesses has been extended from 31 December 2020 to 30 June 2021.
 - Borrowers with a loan that has a public guarantee under Royal Decree-Law 8/2020 may apply for an extension to the loan due date, as well as an extension on the public guarantee by the same amount of time.
 - Customers that meet the eligibility requirements laid down in the Royal Decree-Law may obtain an extension of the grace period for repayment of the principal of the guaranteed loan – whether the guarantee was delivered under Royal Decree-Law 8/2020 or under Royal Decree-Law 25/2020 – for a maximum period of 12 months, thus allowing for a maximum total grace period of 24 months.
 - Financial institutions are required to uphold working capital financing facility limits until 30 June 2021 for all customers that meet the eligibility requirements and have been granted a loan that is guaranteed under either Royal Decree-Law 8/2020 or Royal Decree-Law 25/2020.

- Consistent with the prolonged effects of the crisis, "Royal Decree-Law 3/2021, of 2 February, introducing measures to reduce the gender gap and other Social Security and economic measures", has extended the deadline to apply for public moratoriums until 30 March 2021. It moreover stipulates a maximum cumulative duration of nine months for those applied for since 30 September 2020, including any moratoriums granted previously, and allows for a transitional regime for those granted between 30 September and the date on which the Royal Decree-Law came into force, for which the duration initially granted may be maintained.

In the area of solvency, on 12 March 2020 the ECB published a raft of measures to firm up the resilience of institutions in the current climate, allowing institutions to temporarily operate below the minimum requirements of Pillar II Guidance and the capital conservation buffer. Moreover, the entry into force of article 104 a) of the CRR II was brought forward, allowing institutions to cover the minimum requirements of the Pillar II Requirement not only with Common Equity Tier 1 capital, but also with Additional Tier 1 capital and Tier 2 capital. Regulation (EU) No 2020/873 of the European Parliament and of the Council, of 24 June 2020, amending the CRR and CRR II in respect of certain adaptations made in response to the COVID-19 pandemic was published on 26 June 2020 (see chapter 7 on "Capital management, solvency and leverage").

• Reputational risk

Following the Board of Directors' approval and annual review of the Reputational Risk Management Policies and Procedures Manual, the Bankia Group has included reputational risks in its risks model, and meets regulatory and supervisory requirements for the management of this risk.

The Basel Committee on Banking Supervision defines reputational risk as "the risk arising from negative perception on the part of customers, counterparties, shareholders, investors or regulators that can adversely affect a bank's ability to maintain existing, or establish new business relationships and continued access to sources of funding".

Since the end of 2015, and in line with the recommendations of the Spanish National Securities Market Commission's Unified Code of Good Governance of Listed Companies, included in the Responsible Management Plan 2016-2018, the entity performed a corporate-wide non-financial risk identification, evaluation and control exercise with a view to improving the management of reputational risk and complying with new regulator and supervisor requirements. The 2019-2020 Responsible Management Plan once again includes a commitment to manage reputational risk, maintaining the system in place and taking measurements to monitor this risk and abide by regulatory requirements.

Sustainable management of reputational risk is crucial for carrying out the Bankia Group's long-term plans and achieving its objectives. It considers reputation not only as past performance, but also as a possibility and future opportunity. The Bankia Group attaches great importance to managing its reputation, as one of its objectives is to achieve trust, loyalty and the best possible valuation on the part of its stakeholders to improve its competitiveness. To meet these requirements, in 2016 the Board of Directors approved the first Reputational Risk Policies, which are updated on an annual basis. The Group also works to keep an in-house reputational risk map updated which enables Bankia to actively manage the events, based on their severity, that imply the greatest reputational risk.

By drawing up a reputational risk map, the Bankia Group can assess risk events, which are classified according to probability and financial impact by management centres and reputational risk coordinators. The identification of these centres also enables the reputational risk culture to be prioritised internally in business and management areas that are more sensitive due to their exposure to the events identified. The Bankia Group also has a synthetic indicator for regular monitoring of reputation capable of identifying the main risk events both within the entity and the sector that could result in a deterioration in reputation, as well as the quality of the Group's control environment to prevent or mitigate them. Through this indicator, the Board of Directors is able to assess the Bankia Group's level of reputational risk and decide whether there is a need to implement measures or make any decisions relating to its internal management processes or its relations with stakeholders.

• Risks related to the reform of benchmark interest rates

As mentioned in Note 1.3 to the consolidated annual accounts of the Bankia Group, the various regulators in different jurisdictions are currently in the process of reforming indices used as interest rate benchmarks at which multiple financial transactions are contracted in different markets and currencies between different financial market participants. These benchmark indices will be replaced by other risk-free alternatives based on real transactions.

In order to implement the changes arising directly from the interest rate benchmark reform, the Group has developed a project to address the transition. As part of this project, an effective governance framework has been developed, which is made up of a set of multidisciplinary working groups with members from the Risk, Systems, Legal, Business and Regulatory Compliance Departments, among others, aimed at analysing, reviewing and coordinating the impacts, the actions to be taken by all areas of the Bank and the transformation processes required by the reform of the benchmark indices. The project is led by the Deputy General Directorate of Finance, who regularly reports to the Group's governing bodies on the status of the implementation.

9.- FORECLOSED REAL ESTATE ASSETS

At the December 2020 close, the net balance of real estate assets foreclosed and received in payment of debts of the Bankia Group (businesses in Spain) stood at EUR 1,747 million (EUR 2,524 million gross), accounting for 0.8% of the Group's assets. Part of these assets (EUR 12 million gross) are classed as disposal groups, as described in Note 18.5.1 to the Bankia Group's consolidated annual accounts.

ASSETS FORECLOSED AND RECEIVED FROM BANKIA, S.A. - BUSINESSES IN SPAIN

(thousands of Euros)	December 2020			
	Gross amount	Impairment	Carrying amount	Coverage (%)
Real estate assets deriving from real estate construction and property development	323,504	131,088	192,416	40.5%
Of which: completed buildings	146,481	39,476	107,005	26.9%
Of which: property developments under construction	31,808	15,161	16,647	47.7%
Of which: land	145,215	76,451	68,764	52.6%
Real estate assets from financing for home purchases	1,555,377	494,873	1,060,504	31.8%
Other real estate received in payment of debts	645,280	150,796	494,484	23.4%
Total assets foreclosed	2,524,161	776,757	1,747,404	30.8%

It is Group policy to help borrowers meet their obligations, thus ensuring that foreclosure is always the last option. With this in mind, the Group seeks to mitigate the relevant effects with a range of initiatives: adjusting and renegotiating debts, and offering everything from deferrals to grace periods, to name but two. Only when the amount financed appears unlikely to be recovered is the secured asset acquired.

To unlock the value of foreclosed assets, the focus is first on sales and second on rentals, to obtain returns and address specific circumstances related to the Housing Social Fund and/or special rentals. In the case of unique assets (specific buildings, offices, commercial premises, industrial buildings and land), the general policy is to sell these assets. To this end, the Group has mandated a specialised company, Haya Real Estate, to service, manage and market the Group's foreclosed assets under the supervision of the Real Estate Management Department.

Moreover, the Bankia Group has in place an active policy of recording provisions with respect to such assets based on an in-house methodology for estimating discounts on the reference value and the sales costs of non-current assets in the sale of foreclosed assets or assets received in payment of debts. Thus, the provisions arranged at the December 2020 close for foreclosed real estate assets originating from the Group's businesses in Spain amounted to EUR 777 million as from the date of foreclosure, accounting for a coverage rate of 30.8% as from the foreclosure.

As part of its strategy to reduce non-performing assets, the Bankia Group sold foreclosed properties for the amount of EUR 134 million in 2020, 71.7% down on the value of the sales made in 2019, in large part due to the standstill in the real estate market following the COVID-19 crisis.

Following the wholesale portfolio sales in 2019, progress has been made in 2020 on integrating the internal foreclosed asset approach into management through the culmination of various projects. In this regard, new tools have been developed to enhance the information available, which improves decision-making processes regarding commercial activities to enhance the evaluation of the assets organically. The Group has not made any significant wholesale portfolio sales in this period. The governance and control processes of the appraisals used to estimate the discounts on the reference value have also been improved.

10.- INFORMATION ON RATING AGENCIES

The ratings given to the Bankia Group by the various agencies are those detailed in the following tables:

Issuer Ratings BANKIA				
	S&P Global Ratings	Fitch Ratings	DBRS	Scope Ratings
Long term	BBB	BBB	BBB (high)	BBB+
Short term	A-2	F2	R-1 (low)	S-2
Outlook	Credit Watch Positive	Rating Watch Positive	UR Positive	UR Upgrade
Date	23/09/2020	29/09/2020	24/09/2020	21/09/2020

Mortgage Covered Bond Ratings BANKIA				
	S&P Global Ratings	Fitch Ratings	DBRS	Scope Ratings
Rating	AA-	A+	AAA	AAA
Outlook	Negative	Rating Watch Positive	---	Stable
Date	28/09/2020	18/11/2020	18/09/2020	10/07/2020

Note: With respect to the ratings assigned to Bankia by Moody's, in October 2013 Bankia reported that it had decided to terminate the contractual relationship with Moody's. With this in mind, the ratings this agency continues to publish on Bankia are deemed "Unsolicited" and "Non-participating" in nature. In other words, Bankia does not take part in any review of the ratings issued by the agency, which bases its decisions strictly on the information publicly available on the entity. Despite the fact that the agency has repeatedly been asked to cease publishing ratings on Bankia, it falls to Moody's alone to decide when to do so.

The ratings agencies took the following steps in 2020:

S&P Global Ratings

- On 29 April, S&P Global Ratings ratified Bankia's long-term 'BBB' rating, with a Stable outlook, indicating that Bankia has sufficient capital to withstand the current economic shock, even if circumstances worsen. On the same date, S&P ratified Bankia's short-term 'A-2' rating.
- Subsequently, on 23 September, following the CaixaBank merger announcement, S&P changed Bankia's long-term outlook to Credit Watch Positive (CW Positive).
- Lastly, on 28 September, S&P affirmed its 'AA' rating for Bankia's covered bonds, downgrading the outlook from Stable to Negative, mirroring the change in the outlook for sovereign debt on 18 September, which was also lowered from Stable to Negative.

Fitch Ratings

- On 27 March, Fitch Ratings (Fitch) placed Bankia's long-term ('BBB') and short-term ('F2') ratings on Rating Watch Negative (RWN), on the understanding that the economic fallout of the COVID-19 pandemic poses a short-term risk for Bankia.

Moreover, following a change in methodology, Fitch lowered its rating of the SNP debt to "BBB-" from "BBB", and that of the subordinated debt to "BB+" from "BBB-".

- On 8 April, Fitch placed the rating of Bankia's covered bonds, rated "A+", on RWN, given that the outlook for covered bonds reflects that of the issuer rating.
- On 16 September, Fitch ratings affirmed Bankia's 'BBB' rating, deactivating the Rating Watch Negative (RWN) and placing the outlook on Negative.
- Subsequently, on 29 September, following the CaixaBank merger announcement, the agency upgraded Bankia's long-term outlook to Rating Watch Positive (RW Positive). According to Fitch, Bankia stands to benefit from forming part of a combined institution with a stronger franchise, a more diversified business, greater capacity for income generation, better quality assets and higher coverage ratios owing to the additional provisions.
- On 5 October Fitch set the outlook for Bankia's covered bonds at RW Positive, reflecting the same outlook as the issuer rating.
- Finally, on 18 November, Fitch affirmed its "A+" rating for Bankia's covered bonds, RW Positive.

DBRS

- On 15 April, the agency DBRS ratified Bankia's 'BBB' (high) rating, and lowered Bankia's outlook from Positive to Stable. The reasons leading the agency to downgrade the entity's outlook are industry-specific, since it expects asset quality in the sector to worsen, provisions to rise and profitability to fall. It nonetheless confirmed Bankia's rating thanks to the reduction in non-performing assets in recent years, an improved risk profile and decreased exposure to SMEs and vulnerable sectors.
- On 2 July, the agency affirmed Bankia's 'BBB' (high) rating with a Stable outlook after conducting its annual review of Bankia's credit profile.
- On 18 September, DBRS affirmed its 'AAA' rating of Bankia's covered bonds after conducting its annual review of the mortgage portfolio.
- On 24 September, DBRS placed the long-term rating for Bankia, 'BBB' (high) on review with a positive outlook (Under Review Positive). This action reflects the agency's opinion that Bankia will benefit from an improved rating following the merger with CaixaBank.

Scope Ratings

- Following the annual review of Bankia's mortgage covered bonds, on 10 July, the agency ratified its rating of Bankia's covered bonds at 'AAA', with a Stable outlook.
- On 31 July, Scope affirmed its "BBB+" long-term rating for Bankia, outlook Stable.
- On 21 September, Scope placed Bankia's long-term rating outlook on Under Review for Upgrade. The action reflected the merger announcement between Bankia and CaixaBank. The agency considers that the merger will strengthen Bankia's credit profile.

11.- SHARE PRICE PERFORMANCE AND SHAREHOLDING STRUCTURE

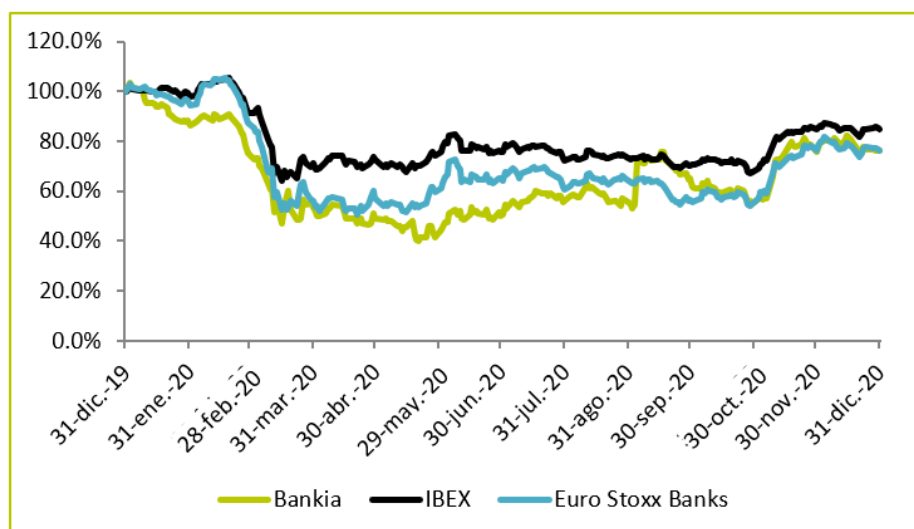
The onset of the COVID-19 pandemic in the first half of 2020 had unprecedented repercussions on economic activity in the main regions worldwide. The European financial sector again fell prey to high exposure to a greatly impaired economic cycle, and to the considerable uncertainty generated in the early months as a result of the economic reconstruction measures enacted and the sectors most affected by the coronavirus, triggering enormous concern among investors. Compelled by necessity, central banks announced interest-rate cuts and new stimulus programmes, the likes of which had not been seen since the financial crisis of 2008, while also advising greater prudence in dividend pay-out and share buy-backs.

In the second half of the year countries have continued to fight against the tide of the pandemic, suffering a second wave of contagion, followed by a third, which prevented the economies from posting a global recovery. At the end of July the EU was able to sign a historic economic reconstruction agreement (a EUR 750,000 million Recovery Fund), sponsored by Merkel and Macron (including debt mutualisation and up to EUR 390,000 million of aid via subsidies). In November, two key events took place just two days apart: Biden's victory in the controversial US elections on 3 November (and a commitment to push through an aggressive fiscal stimulus package) and Pfizer's announcement that its vaccine had proven to be effective in combatting the coronavirus in 90% of cases. These milestones set off a change of sentiment in the market and fuelled a turnaround that saw the main share indices rebound by 20% (40% in the case of the Eurostoxx Banks index) in the last two months of a year that ended with the United Kingdom and the European Union signing the Brexit agreement in the last week of 2020.

In the very complex context of 2020, banks have gone from experiencing the biggest declines in the industry indices since the start of the COVID-19 crisis at the end of February 2020, to posting one of the strongest industry performances from November onwards, against a backdrop of restrictions on dividends being raised as from September 2021, and consolidation of the European banking sector (which began with the Bankia-CaixaBank merger) being encouraged by the ECB with the incentive of lower regulatory capital requirements for merged institutions.

Since the two banks reached a merger agreement on 18 September, Bankia shares have traded in parallel with CaixaBank shares. In 2020 Bankia shares fell back by -23.84% (second-best performance of the year among IBEX 35 banking stocks), CaixaBank lost -24.91% and Eurostoxx Banks dropped -23.72%, compared to a -5.14% decline in the Eurostoxx 50 index and a 15.45% fall in the IBEX 35.

Share price



At the December 2020 close, a total of 29 research firms were actively covering Bankia's shares and providing a target price (the consensus target price at year end was EUR 1.34/share). Buy and Sell recommendations each accounted for 13.79% of all

recommendations, respectively, while 62.07% of recommendations were Holds and 10.34% were unavailable (analysts having suspended their target price and/or recommendation due to the merger process or directly offering data for the merged entity comprising Bankia + CaixaBank). One equity research firm did not have an analyst at year end or had yet to resume coverage of the stock.

The information on the consensus reached by the analysts, broken down by firm, target price, recommendation and analyst, is available on the corporate website under "Shares" in the section on "Equities analysts". More than 550 reports referring to Bankia were published in 2020, with analysts updating their target prices over 130 times and modifying their recommendations on more than 30 occasions.

12.- INFORMATION ON TREASURY SHARES

On 27 May 2020, Bankia's Board of Directors approved the proposal submitted concerning the new 2020 Treasury Stock Policy, drafted in line with an accepted market practice per the provisions of article 13 of Regulation (EU) No 596/2014 on market abuse, which, in the case of Spain, has taken the form of the execution of liquidity contracts in accordance with the requirements envisaged in Spanish National Securities Market Commission (CNMV) Circular 1/2017, on liquidity contracts, amended by CNMV Circular 2/2019 of 27 November 2019. The current treasury stock policy, even where no provision is made for the execution of a liquidity contract with a third party, has been drafted with regard to the main guidelines applicable to such liquidity contracts.

Group trading in treasury shares pursues the following objectives:

- To provide liquidity or supply securities to investors, as appropriate, adding breadth and minimising temporary mismatches between supply and demand in trading in Bankia shares.
- To take advantage, for the benefit of all shareholders, of weakness in share price relative to the medium-term outlook.
- To implement, as appropriate, share buybacks approved by the Board of Directors or in performance of resolutions adopted at the Shareholders' Meeting and, in particular, to afford Bankia access to shares that enable it to meet its obligations for the delivery of shares undertaken previously in respect of issuances of convertible or exchangeable securities and other corporate transactions, such as remuneration or loyalty plans for shareholders, directors, managers or employees.
- To comply with other legitimate commitments previously undertaken.
- Any other purposes permitted under the applicable regulations.

Discretionary trading of treasury shares refers to the purchase or sale of treasury shares on the electronic trading platforms of official markets, multilateral trading systems and any other organised trading platform ordered by Bankia, directly or indirectly. Transactions in Bankia shares ordered by companies controlled by Bankia also fall within this category. The discretionary trading of treasury shares may not be carried out to distort price discovery and may not be carried out if the unit in charge of executing the trade possesses inside or relevant information.

Transactions involving treasury shares are performed by the Investment Management Department, a separate unit protected by the appropriate Chinese walls, within the general guidelines determined by the Board of Directors and the Shareholders' Meeting, which also set the risk limits for the treasury stock policy. No other Group unit may trade in treasury shares, except for the repurchase of treasury shares for hedging market risk or to facilitate brokerage or hedging for customers. This may be carried out by units other than the Investment Management Department.

Due to the Bankia-CaixaBank merger process, trading in treasury shares has been interrupted since 3 September 2020, when the CNMV received notification that this strategic transaction with CaixaBank was under consideration.

At 31 December 2019, Bankia held 22,330,560 treasury shares, with a par value of EUR 1 each and a carrying amount of EUR 50.3 million. In 2020 a total of 26,589,523 shares were purchased and 16,934,883 shares were sold. As a result of such

transactions, the number of treasury shares held at the December 2020 close stood at 31,985,200 shares with a par value of EUR 1 each and a carrying amount of EUR 49.5 million.

Treasury shares held at the December 2020 year end represented 1.04% of Bankia's share capital at that date. The following tables show the treasury stock transactions carried out in 2020:

TREASURY SHARE TRANSACTIONS - BANKIA GROUP

SHARES ACQUIRED IN 2020

Communicati on date	No. of shares acquired	Par value per share (€)	Par value (€m)	% of share capital (*)
January	2,733,928	1.0	2.7	0.09%
February	2,742,354	1.0	2.7	0.09%
March	4,016,312	1.0	4.0	0.13%
April	1,647,963	1.0	1.6	0.05%
May	5,662,919	1.0	5.7	0.18%
June	5,092,663	1.0	5.1	0.17%
July	1,834,413	1.0	1.8	0.06%
August	2,823,704	1.0	2.8	0.09%
September	15,338	1.0	0.02	0.00%
October	40	1.0	0.00004	0.00%
November	19,889	1.0	0.02	0.00%
December	-	1.0	-	0.00%
TOTAL	26,589,523		26.6	0.87%

(*) Percentage calculated based on the share capital at each month's close.

The percentage reflecting the total amount of acquisitions is calculated based on the share capital at the December close.

TREASURY SHARE TRANSACTIONS - BANKIA GROUP

SHARES SOLD IN 2020

Communicati on date	No. of shares sold	Par value per share (€)	Par value (€m)	% of share capital (*)
January	494,028	1.0	0.5	0.02%
February	1,432,562	1.0	1.4	0.05%
March	2,113,274	1.0	2.1	0.07%
April	1,649,947	1.0	1.6	0.05%
May	1,739,333	1.0	1.7	0.06%
June	6,476,462	1.0	6.5	0.21%
July	1,570,000	1.0	1.6	0.05%
August	1,459,277	1.0	1.5	0.05%
September	-	1.0	-	0.00%
October	-	1.0	-	0.00%
November	-	1.0	-	0.00%
December	-	1.0	-	0.00%
TOTAL	16,934,883		16.9	0.55%

(*) Percentage calculated based on the share capital at each month's close. The percentage

reflecting the total amount of sales is calculated based on the share capital at the December close.

13.- DIVIDEND POLICY

The distribution of dividends is voted on at the General Meeting of Shareholders based on proposals made by the Board of Directors.

In this connection, on 2 April 2020, in enforcement of the resolutions adopted at the General Meeting of Shareholders on 27 March 2020, Bankia distributed a dividend of EUR 352 million corresponding to the profit obtained in 2019 among the shares with the relevant economic rights.

On 27 March 2020, prior to the General Meeting of Shareholders and given the potential impact of the COVID-19 crisis, Bankia's Board of Directors reviewed the capital distribution objective established in the 2018-2020 Strategic Plan and agreed to forego any extraordinary distribution in the current year. This decision was taken in response to the uncertain current environment and on the grounds that maintaining high solvency at this exceptional time was a key objective that forms part of the Group's top priorities.

Furthermore, in the framework of Bankia and CaixaBank's joint merger plan, both entities undertook not to declare payment of any definitive or interim dividend with a charge to reserves or profit, in cash or in kind, or to make any other distributions of their share capital or reserves or reimburse any part of their share capital until the filing date of the merger deed in the Mercantile Registry of Valencia.

14.- RESEARCH, DEVELOPMENT AND TECHNOLOGY

Investment in technology at Bankia in 2020 was aligned with the shift in the financial industry's activity to adapt to the continuous changes demanded by our customers and regulators, by income statements plagued by tight net interest margins and the arrival of new competitors.

In light of these priorities and the context of the industry (technological, regulatory and markets), Bankia has laid down several strategic lines of action in IT on which it has worked during 2020, launching and carrying out various projects designed to fulfil the requirements of the entity's Strategic Plan as regards technology. These strategic lines were rounded off with the various regulatory projects and business unit projects to which Bankia has geared its efforts in 2020, as well as the steps taken to address the current situation created by the COVID-19 pandemic and those related to the merger plan with CaixaBank.

Below is a summary explaining each of the strategic lines and projects on which Bankia has worked during 2020.

14.1.- Strategic Lines of Technology

- **Digital Transformation.** Bankia has focused its efforts on various areas, which include:
 - Launching a new App and completing the roll-out of the new Bankia Online Empresas.
 - Forging ahead with the Digital Channel Development Plan, with an emphasis on reliability, guidance on sales and conversion.
 - Creating the Group's own acquisition solution under the Waiap brand.
 - Continuing to work on the chatbot, seeking to improve the experience with the customer service centre and to innovate within the App.
 - Strengthening the intelligent platform for the development of artificial intelligence (AI) capabilities.
 - Consolidating the new digital marketing platform with a focus on further development of the analytical and digital marketing tools to engage with customers and non-customers alike in an organised and contextualised way.
 - Implementing the analytical solution in the process to revive consumption.
 - Consolidating the corporate platform for real-time feeding of the new marketing platform.

- **Process redesign.** There are two initiatives to highlight in this area:
 - To implement a platform to unify the generation of all Bankia documents and communications, work got underway in 2019 to implement and integrate the new tool, with 2020 seeing the migration of 1,000 models and 600 document templates.
 - A new Customer Filing System in the form of NEO, aimed at ensuring that all mandatory personal information is updated according to the person in question's relationship with the entity and backed up by documents that evidence this.
- **Core Banking transformation.** The entity continues to promote a set of initiatives including:
 - The development of the New Customer System for integration in Bankia applications.
 - Availability of a single platform for the creation, advertising and distribution of products that includes all of the bank's lines of business and permits the development of capacities relating to the creation, administration and marketing of products (customer acquisitions, payment methods, asset management and insurance), through both internal and external marketing channels.
 - The Payment Methods Plan, with which the bank aims to improve the user experience and optimise the platform's features.
- **Information systems.** In 2020, work has focussed on completing the migration from Netezza to IaaS (Infrastructure as a Service), implementing the Information Builders solution and use thereof for new reports for branches, as well as the creation of a reports portal, which began with submission of the most important reports for the branches (productivity, analytical balance sheet, income statement).
- **Risks.** In 2020, in addition to complying with regulatory requirements, the entity has driven a major transformation of both risk acceptance and the recovery model, incorporating new tools and technologies (analytical models) that will permit more efficient credit risk management.
- **Cyber security.** The principal actions of the Strategic Cyber Security Plan for 2020 include:
 - The development of collaborative platforms for the work of the Red and Blueteam.
 - Function automation and trail creation and audits of actions.
 - The management of third-party security.
 - The development of new analytical models for the automated processing of alerts.
 - The development of a fraud prevention engine to bring together the analysis of transaction links and customer activity.
 - The development of a fraud operation task tray to automate actions (blocks, cancellations, alerts) and to improve the contextual information to investigate alerts.
- **Platform optimisation and evolution.** The main objective of this line is to enhance platforms and reduce costs. It comprises several initiatives which, in 2020, have focused on:
 - The evolution of applications, with an emphasis on accounting applications and their scorecards.
 - App obsolescence management.
 - Evolution of IT Governance and Management Systems.

14.2.- Regulatory projects

The work carried out in 2020 saw some minor modifications with respect to the previous year and was primarily focused on the following areas:

- Advisory, Securities and Capital Markets, which continues to be one of the most important initiatives due to the entry into force of new regulations (Target 2 - Target 2 Securities, Securities Financing Transactions Regulation –SFTR-, etc.); the strengthening of systems for the generation of regulatory statements and implementation of operational improvements in the area of MiFID II (corporate governance, Datamart MiFID, evolution of the appropriateness and suitability tests, etc.)
- Evolution of Regulatory Reporting (Anacredit, Finrep, etc.).
- Tax regulations (Intermediaries Directive, tax identification of Euroresidents, etc.).
- Products and services regulations (Digital authentication in payment operations -3D Secure and SCA-, Reference Indices Regulation, Real Estate Credit Law, etc.).

14.3.- Unit Projects

The requirements arising from the Business Strategy objectives are embodied in the Unit Projects, where the main lines of action have focussed on the implementation of:

- A new customer loyalty programme, which reviews the criteria for waiving commissions, reviewing contracts, evaluating fulfilment of conditions for eligibility for the programme and viewing thereof on the relevant channels.
- A single portfolio management tool, which simplifies the current web of tools and includes, for 2020, Modelled Management for Personal and Private Banking.
- Creation of a new payment methods scheme (Unified Domestic Scheme) and implementation of improvements to the Deferred Payment Issuer services.
- Evolution of the “Bankia Model” developer loans, in the wake of the elimination of restrictions on funding for real estate projects.
- Derivative valuation models for distribution to customers.
- Inclusion of additional data in new customer registration processes with a view to providing more information to help in the fight against money laundering.
- Digital guarantees.

14.4.- Impact of COVID-19 on the technological projects plan

In view of the operating needs arising at the bank as a result of COVID-19, 2020 brought with it a number of IT-related actions, the most noteworthy being:

- The creation of new products and processes with which to cater for the newly approved government measures to provide liquidity to companies and the self-employed.
- Creation of an infrastructure for communicating and sending data and documentation to the Official Credit Institute (ICO) for the registration and validation of transactions.
- Launch of simulators on the channels available to customers to enable them to check whether they are eligible for moratoriums.
- The creation and adaptation of regulatory reporting to the new scenario.

14.5.- Projects related to the merger with CaixaBank

The last quarter of the year was focused on the Merger Plan with CaixaBank. The Bankia teams have focused on finalising the majority of the projects envisaged in the Annual Plan in order to execute all projects required to prepare for the merger. During this period, a massive effort was made to analyse and define the main lines of action of this process:

- Development of interfaces for the migration of data.
- Accounting reconciliation process.
- Gap analysis and drawing up action proposals.
- Migration of legacy data.

15.- FORECASTS AND BUSINESS OUTLOOK

• Economic backdrop

Although the beginning of 2021 may be challenging given the adverse health situation, especially in Europe and the United States, the outlook for the global economy is substantially better than in 2020, thanks to the gradual rolling out of vaccines, the provisional results of which have proven to be highly effective against COVID-19. Furthermore, economic activity will likely be buoyed by the new fiscal and monetary measures, both in Europe and the United States, and lower political uncertainty (the conclusion of Brexit and a new, more predictable US administration). If the vaccines prove their effectiveness, the most likely scenario is for a gradual consolidation of the recovery in the leading developed economies and the avoidance of fresh outbreaks caused by the strong link between mobility/socialisation and infections as seen in 2020. The reactivation of the leading developed economies could become highly dynamic as progress is made towards herd immunity, which will foreseeably be in the second half of 2021.

In the monetary policy field, the central banks will continue their stimuli throughout most of the year in order to maintain accommodative financial conditions that enable the costs of the current crisis on the productive structure to be absorbed as quickly as possible and to converge with the inflation target. As regards the ECB specifically, it will maintain its emergency asset purchase programme and long-term financing operations over the course of the year; it is highly unlikely that it will lower benchmark interest rates. This contribution by monetary policy and an economic context that should improve thanks to the vaccination of the population against COVID-19 will favour an increase in risk asset prices and the consolidation of the upward trend in debt yields, albeit limited in intensity. 12-month Euribor should oscillate within the range of -0.50% and -0.45%.

The outlook for the Spanish economy in 2021 gives grounds for hope, as confidence among economic agents improves, thanks to the roll-out of effective vaccines against COVID-19. Although there could be a third wave in the first half of 2021, the impact going forward should wane. At any rate, the deterioration observed in the closing stretch of last year adds uncertainty to the scenario and points to a weaker and slower recovery, with GDP expected to grow by around 6% following a slide of 11% in 2020. As a result, at the end of 2021 GDP will still be down 5.9% with respect to the end of 2019.

Irrespective of the evolution of the pandemic, this scenario poses certain risks, especially domestically. In this regard, the ability to adapt economic policies amidst a highly challenging and changeable environment will be key. Although efforts must remain focused on addressing the health crisis and its economic fallout until the country is on a solid and sustained path to recovery, other economic policy moves aimed at fostering medium to long-term growth cannot be overlooked. A major factor will be the ability to mobilise and allocate the European reconstruction funds (Next Generation EU) in an efficient manner.

• Business outlook for the Bankia Group

The business outlook for 2021 will be marked by the project to merge with CaixaBank and the current uncertainty in the wake of the COVID-19 crisis.

As regards the project with CaixaBank, the administrative authorisations required for the Merger to take effect have not yet been obtained; the Merger is expected to be closed legally during the first quarter of 2021, while the technological integration is expected to be completed in the last quarter of the year.

As a result of the Merger:

- Annual cost synergies are expected to be generated in an amount of EUR 770 million and new annual income of EUR 290 million is expected to be obtained.
- As regards the merged entity's solvency targets, its CET1 ratio will stand at between 11.0% and 11.5%, excluding the transitional adjustments for IFRS 9, while the buffer will stand at between 250 and 300 basis points above the SREP regulatory requirement.
- Earnings per share for Bankia shareholders is expected to increase by around 70% with respect to the market estimates for 2022.

As regards COVID-19, the specific impact over the coming months of the pandemic and the mitigating effects of the support measures introduced by the Government and financial institutions have yet to be seen. Nonetheless, the Group faces a number of risks common to the entire banking sector and tied to the future of the pandemic, such as a potentially major increase in bad debt, a drop-off in new loans granted to private customers, particularly consumer loans, greater fluctuations in the value of its assets (including financial instruments measured at fair value and securities held for liquidity reasons), a negative impact on the cost of financing (particularly in a climate where future credit ratings may be affected) and weaker results due to the decline in production activity and consumer spending caused by the pandemic.

In this regard, the Group will continue monitoring its loan portfolios and the main risk indicators on a continual basis to anticipate any potential impacts from the crisis on asset quality, while continuing to use efficiency and cost controls as major management levers to mitigate the effects of the pandemic on the Group's business and activities.

16.- SIGNIFICANT EVENTS AFTER THE 2020 CLOSE

No relevant subsequent events have taken place in the period running from 31 December 2020 to the date of authorisation for issue of the Bankia Group's consolidated annual accounts that could have a major effect thereon.

17.- ANNUAL CORPORATE GOVERNANCE REPORT

The Annual Corporate Governance Report for 2020, which forms part of this Directors' Report, was prepared in accordance with article 540 of the Spanish Companies Act, with the content outlined in Order ECC/461/2013, of 20 March, and CNMV Circular 2/2018, of 12 June, amending Circular 5/2013, of 12 June, which establishes the formats of the annual corporate governance reports of listed companies, and is attached hereto as a separate document. The report includes a section on the bank's level of compliance with corporate governance recommendations in Spain.

18. - NON-FINANCIAL INFORMATION STATEMENT

In accordance with Law 11/2018, of 28 December, amending Spain's Code of Commerce, the consolidated text of the Spanish Companies Act, enacted by Royal Legislative Decree 1/2010, of 2 July, and Spanish Audit Law 22/2015, of 20 July, regarding the disclosure of non-financial and diversity information, the Bankia Group has prepared a non-financial information statement, which forms part of this Directors' Report and is attached as a separate document. This non-financial information statement contains relevant information on environmental, social and employee matters, respect for human rights, anti-corruption and bribery matters, and society. The information contained therein was verified by KPMG Asesores, S.L., as independent assurance services provider.



NON-FINANCIAL INFORMATION STATEMENT FOR 2020

This document is a translation of an original text in Spanish. In case of any discrepancy between the English and the Spanish version, the Spanish version will prevail.

This document presents the information required by the Spanish Non-financial and Diversity Information Act of 28 December 2018 and was prepared in accordance with the comprehensive option of the GRI Sustainability Reporting Standards. It has been assured by an independent expert in accordance with ISAE 3000.

Therefore, the Non-Financial Information Statement describes the key features of the Bankia Group's business model and risk management; its sustainability plans; environmental, social and employee matters; its policy on human rights; anti-corruption and bribery matters; and the bank's relationship with society. It describes the main policies pursued, actions taken and their outcome, the principal risks and how they are managed, and non-financial key performance indicators.

The non-financial information has been prepared considering the European Commission's communication on 5 July 2017 regarding guidelines on non-financial reporting (methodology for reporting non-financial information, 2017/C 215/01).

The information contained in the Non-Financial Information Statement encompasses the Bankia Group's operations (with the same scope as the consolidated financial statement) in 2020. It contains information that is presented in greater detail in other Bankia Group reports, such as the Annual Corporate Governance Report and the Remuneration Report. The information contained in the "People and talent management" section was prepared considering the Bankia, S.A. scope, except for the "2020 Training plan" which covers the Bankia Group scope.

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1. FOREWORD

a) Letter from the Chairman



2020 will go down in history as the year of the COVID-19 pandemic.

We just closed one of the most difficult years in recent history, in which as a society we have had to deal with a healthcare crisis that continues to have considerable ramifications in terms of the loss of human life and the socio-economic impact.

On the production front Spanish GDP shrank by 11% in 2020 and although we expected an intense recovery of the economy in 2021 and 2022, in principle will not return to pre-crisis levels until finally this year.

All of Spain's economic sectors have suffered the consequences, to a greater or lesser degree, of not only the strict lockdown and its implications on spending or investment decisions, but also the ongoing uncertainty caused by the disease. As a cyclical sector, the banking industry has not been immune to this situation or the fallout. The knock-on effects have been felt in our entity.

Since the start of lockdown in March we have made the utmost efforts to maintain a close relationship with our customers in their greatest hour of need.

Being an essential service, we kept practically all of our branches open in order to provide the best possible service to our customers. This, alongside the excellent operation and security of our digital channels, made it possible for our entity to provide the financial services required by our customers at all given times. This would not have been possible without the commitment of Bankia's professionals, who throughout the year have demonstrated an amazing ability to adapt to the new context caused by the pandemic and an absolute dedication to customer service.

Moreover, in view of the economic impact of the health crisis, we designed solutions and products to support families and businesses affected by the shutdown in activity. We granted payment holidays for mortgages and consumer loans to households which have lost a large portion of their income during the year. Alongside the Spanish Official Credit Institute (ICO), we helped thousands of businesses and self-employed workers preserve the viability of their business ventures with new lines of financing.

As such, not only our entity but the industry as a whole has become part of the solution to the problems caused by the crisis, helping to protect family income and production in Spain.

Thanks to the banking industry's efforts in recent years to bolster solvency and liquidity, and the support of monetary authorities, on this occasion banks have the capital and financial strength to continue financing businesses and families.

The economic effects of the crisis, together with these actions we have undertaken, have had a direct impact on profit for the year.

In 2020 we have recognised EUR 505 million of extraordinary provisions to cover the impacts that the COVID-19 crisis could have on our lending in the future. These provisions have directly affected profit after tax, which stands at EUR 230 million.

Nevertheless, our entity has continued to show great commercial dynamism, reflected in the fact that this year we have once again achieved record market shares in our priority high-value products. This includes reaching a 7.5% share in investment funds management and exceeding 8% in lending to businesses for the first time ever.

This huge commercial strength, supported by considerable cost containment, has enabled us to improve core profit by 3.8%.

Despite the challenging landscape, our ability to generate capital organically enabled us to raise our capital ratio to above 15% by the end of the year.

The entity has continuously improved these management KPIs for the last three years, which has helped us to achieve the lion's share of our objectives set in the 2018-2020 Strategic Plan, including the reduction of non-performing assets and the generation of capital.

Therefore, with these 2020 results, we close the final chapter of Bankia with pride having achieved major milestones despite the macroeconomic climate, particularly in terms of interest rates, being a far cry from that envisaged in our strategic plan.

The crisis caused by COVID-19 is having an enormous impact on the financial environment, particularly interest rates. At present, it seems clear that interest rates in Europe will be negative for a long period of time.

This requires us to make structural changes to our business and provide a strategic response.

With this outlook, having devoted numerous sessions in the past to analysing the consolidation of the sector in Spain and Bankia's potential role, the Board of Directors took the view that anticipation would be a key strategic factor.

In times of abrupt changes in the environment, anticipation not only affords us more options, it allows us to undertake integrations from a position of increased financial strength.

Accordingly, the Board of Directors considered that this anticipation should be realised through a search for a partner, in order to join forces and ensure three key aspects:

- A critical size to obtain economies of scale and improve efficiency, while increasing the capacity for sustained investment in technology and innovation.
- A more robust financial position, with a highly-provisioned and well-capitalised balance sheet, in order to take on the consequences of the economic crisis from a position of greater financial strength.
- Sustainable profitability, thanks to a balanced business mix and a strong capacity for generating income from diversified sources.

I think the merger with CaixaBank, which was approved by the shareholders at their extraordinary general meeting on 1 December, meets all these objectives as we will form part of the largest financial group in Spain, with total assets in excess of EUR 660,000 million and over 20 million customers.

This project was launched on the back of a high-quality balance sheet and a unique distribution model which, together with a significant capacity for balanced income generation and synergies arising post-merger, will produce increased efficiencies and returns for all shareholders.

While all of the above is fundamental, of no lesser importance is the achievement of these objectives through shared values and culture, as this is the only way to mitigate the implementation risks related to the merger as a whole.

Bankia and CaixaBank share a management model that prioritises the ongoing improvement of customer satisfaction, which is essential to continue the sustainable generation of value for all stakeholders.

We do this with the conviction that we have to develop a model which harnesses the best of both entities. It is not just about uniting the banks, rather we must create a franchise that improves upon the current practices of each respective entity.

Given our origins, we have shared principles which we must apply and further strengthen, where possible, going forward.

These principles reflect the expectations of different stakeholders: customers, our team, our shareholders and, naturally, the local communities we form part of and serve, a project aimed at supporting and driving the expected growth in the Spanish economy, making it stronger by furthering digitalisation and developing a more sustainable economic environment.

This paves the way for us to join forces on a project of tremendous ambition from a position of humility.

Our ambition is to lead the Spanish banking system during the upcoming period of huge transformation, with the overriding aim of continuing to finance businesses and families, since this is the best way of helping Spain's socio-economic recovery.

A handwritten signature in black ink, consisting of a stylized 'L' followed by a vertical line and a small hook at the top.

2. STRATEGY

a) Backdrop

The extensive spread of the coronavirus (COVID-19) in March and April triggered a historic global recession, the worst since the second world war, as a result of the confinement measures implemented to curb the pandemic. The social and mobility restrictions were gradually lifted as of May, leading to a strong rebound in activity, which was bolstered by the unprecedented tax and monetary stimulus measures. However, the re-emergence of major outbreaks at the end of the summer led to the reinstatement of restrictions on a large part of the service sector in the leading developed economies, which stalled the recovery in the closing months of the year. Growth was also stymied by the high degree of political uncertainty, primarily as a result of the US elections in November and the seemingly never-ending Brexit negotiations.

As a result, 2020 was an exceptionally negative year for the global economy. With the exception of China, which was exceedingly successful in controlling the pandemic and managed to close the year with positive GDP growth, the other major economies posted severe contractions in growth, albeit unevenly depending mainly on the structure of their economies, the scale of their public aid and management of the health crisis. Specifically, GDP in the EMU may have contracted by over 7% in 2020, albeit on a very disparate basis among countries: close to or in excess of 10% in the Southern European countries that are more dependent on tourism and leisure, as opposed to the estimated 5.5% in Germany, where industry, which is less impacted by the crisis, has greater prominence. The effects of the pandemic are so disparate within the EMU that they now imply a new threat to European fragmentation. This led the EU to sign a historic agreement, giving the green light to a Recovery Fund of EUR 750,000 million (EUR 390,000 million in grants and the remaining EUR 360,000 million in loans). This, in conjunction with the SURE employment programme and the soft credit facilities extended to ESM governments and EIB companies, will raise the EU stimulus package to EUR 1.3 trillion. Countries in Southern and Eastern Europe stand to benefit most, where the aid could exceed 10% of GDP.

The impact of the COVID-19 pandemic on the economy and corporate profitability was felt acutely in risk assets, as reflected by the accumulated decline in the S&P 500 of 35% in just a month, 38% on the Euro Stoxx 600 and 42% on the IBEX, which led various countries to impose short-selling bans. This worsening investor sentiment, coupled with the liquidity tensions, as witnessed in the commercial paper, interbank and public debt markets, led central banks to move at a pace and with a decisiveness never seen before. The Fed lowered interest rates by 150 bp and cut the benchmark ratio to 0%; it also established a new round of QE that is unlimited in terms of volume and timescales and put various facilities in place that have enabled it to intervene in almost all market segments. It also improved the terms of dollar swap arrangements with other central banks and repurchased from them Treasury Bills in exchange for dollars. The ECB expanded its QE programme (APP) by EUR 120,000 million until the end of 2020 and launched another programme (PEPP) in an amount of EUR 750,000 million, which was then expanded in December to EUR 1.85 trillion. The PEPP included Greek debt and non-financial commercial paper and, most importantly, it abolished the 33% limit on its purchases of public debt. It also approved fresh injections of long-term liquidity and improved their terms and conditions.

These steps by central banks, their commitment to ensure favourable financial conditions, coupled with the initial control of the pandemic and the subsequent progress made in treatments and vaccines, all supported an ongoing recovery in risk assets, which came to reach an all-time high in the US in the closing stretch of the year, while European indices bounced back by 75% from their February/March lows. Moreover, 12-month Euribor fell sharply from the high of -0.05% to an all-time low of close to -0.51%. Risk premiums on European peripheral bonds also fell, with the IRR on Spanish 10-year bonds hitting levels of very close to 0%.

THE SPANISH ECONOMY, SEVERELY IMPACTED BY THE PANDEMIC

The performance of the Spanish economy in 2020 was dictated entirely by the COVID-19 crisis, which constituted a major and unprecedented negative shock. As this crisis could not have been foreseen, it has disrupted all initial forecasts, which had been pointing to a prolongation of the expansive growth phase. The extraordinary measures adopted to contain the spread of the pandemic, such as the declaration of the state of emergency of 14 March, limited people's mobility and paralysed a major part of production activity, which led to an unprecedented contraction of GDP in the first half of the year.

Although the subsequent lifting of the restrictions allowed for a gradual recovery in activity, this growth was incomplete and far from uniform among the Spanish regions, sectors and individual economic agents. Moreover, a progressive slide in the momentum of the recovery could be observed from the summer onwards

as outbreaks re-emerged, which led to the reintroduction of restrictive measures (a new state of emergency was declared on 25 October 2020).

Spain therefore posted an abrupt year-end fall in GDP of 11%, a contraction not seen since at least the Spanish Civil War. The impact of the crisis has been especially intense in Spain and more pronounced than in neighbouring countries due to various factors. Firstly, the spread of the pandemic was relatively worse in Spain and the initial restrictions at the beginning of the crisis were more stringent than in other countries. Secondly, the major weight of service sector activities, especially those tied to tourism (hospitality and catering, leisure and transport), which are labour intensive and require greater social interaction, as well as peculiarities of Spain's productive landscape, such as the high degree of temporary employment and the smaller size of companies, all made the Spanish economy particularly susceptible to this pandemic and hindered a swift exit from the crisis.

The economic policy response has been key to mitigate the impact of the crisis on the most vulnerable groups, activities, employment and income of individual agents; it also served to alleviate liquidity problems for companies in order to safeguard the productive fabric of the country. The fundamental objective is to prevent a temporary shock from permanently affecting growth potential; i.e. protecting the productive fabric to ensure a rapid reactivation of the economy once the crisis has remitted. Among the measures implemented, of particular note are the furlough schemes (ERTE) and the granting of public guarantees for the financing of companies (ICO credit lines).

The pandemic also severely affected the labour market, especially in areas of activity most impacted by social distancing measures. However, the destruction of jobs was mitigated by the broad adherence to the ERTE furlough schemes. After losing almost one million contributors to the Social Security system at the nadir of the crisis -between mid-March and the end of April-, the subsequent improvement meant a sizeable part of the jobs that were lost could be recovered. The Social Security system closed the year with 18.9 million contributors, still below the pre-crisis level of 19.34 million and the 2019 year-end figure of 19.26 million. At 31 December, over 755,000 employees remained furloughed, although this is much lower than the all-time high of almost 3.6 million at the end of April. As regards the employment rate, although the increase has been partially contained by the ERTE furlough schemes, it closed the year at over 16% of the active population, as opposed to 13.8% the previous year.

All demand components contributed to the collapse in activity in 2020, except for public-sector spending, which is consistent with the public resources allocated to soften the impact of the pandemic on households and businesses. In terms of households, although the support measures (especially through the ERTes) alleviated the downward pressure on income, there was a notable decline in consumer spending as a result of the restrictions and lockdown, especially spending in bars and restaurants, hospitality, leisure and consumer durables, such as automobiles. Conversely, the savings rate hit an all-time high; although there is always an element of precautionary saving as a response to periods of high uncertainty, most of the saving has been involuntary, given that consumers were unable to spend money as shops were closed.

Investment, both in capital goods and construction, was the component that saw the greatest contraction, due to the limitations imposed on activity, the weakening confidence, the context of considerable uncertainty, the underuse of installed production capacity and the drastic deterioration of the financial position of the corporate sector.

As regards external demand, its negative contribution to GDP can mainly be explained by the slump in tourism, a sector of vital importance to the Spanish economy and directly affected by the mobility restrictions and the worsening confidence.

Although the economy continued to generate financing capacity in 2020, this component also suffered a notable downturn (1.3% of GDP in 3Q20, the lowest level since 2012): the vast expansion of the public deficit as a result of the spending to combat the pandemic, as well as the effect of the automatic stabilisers, was partially offset by the considerable improvement in households' financial position. Household and company debt increased considerably, mainly as a reflection on the denominator-effect of much lower GDP (143.2% of GDP in 3Q20 in consolidated terms, the highest level in three years).

Inflation remained in negative territory throughout a large part of the year, closing the year at -0.5% as a result of lacklustre demand and the intense moderation in energy prices. Disturbances in supply and demand conditions was highly asymmetrical depending on the component: inflation of goods that increased their weighing in the basket of products during the pandemic, especially food, was higher than everything else.

WORLD AND SPAIN ECONOMIC OUTLOOKS

The outlook for 2021 for the global economy is substantially better than 2020, thanks to the positive provisional results of the vaccines at a most advanced stage, which should lead to the gradual disappearance of the COVID-19 shock. Furthermore, economic activity will likely be buoyed by the new fiscal and monetary measures, both in Europe and the United States, and lower political uncertainty (the conclusion of Brexit and a new, more predictable, US administration). Consequently, the most likely scenario is for a gradual consolidation of the recovery in the leading developed economies and the avoidance of fresh outbreaks caused by the strong link between mobility/socialisation and infections as seen in 2020.

In the monetary policy field, the central banks will continue their stimuli throughout most of the year in order to maintain accommodative financial conditions that enable the costs of the current crisis on the productive structure to be absorbed as quickly as possible and to converge with the inflation target. As regards the ECB specifically, it will maintain its emergency asset purchase programme and long-term financing operations until the end of the year; it is highly unlikely that it will lower benchmark interest rates. This contribution by monetary policy and an economic context that should improve thanks to the vaccination of the population against COVID-19 will favour an increase in risk asset prices, a consolidation of the upward trend in debt yields, albeit limited in intensity, while 12-month Euribor should oscillate within the range of -0.50% and -0.45%.

Following a very negative 2020, the outlook for the Spanish economy in 2021 gives grounds for hope, as confidence among economic players improves, thanks to the roll-out of effective vaccines against COVID-19 and the control of the pandemic from a health perspective; although there could be a third wave in the first half of 2021, the impact going forward should wane and containment of the virus would only require limited restrictive measures. At any rate, the deterioration observed in the closing stretch of last year adds uncertainty to the scenario and points to a weaker and slower recovery, with GDP expected to grow by around 6% in 2021. A return to pre-crisis levels of activity will take time -at least until the end of 2022-, given the damage inflicted on business and the labour market.

Over and above the evolution of the pandemic itself, this scenario is not without its risks. On the international scene, of note are the unforeseeable US-China trade relations. Domestically, the ability to adapt economic policies amidst a highly challenging and changeable environment will be key. Efforts must remain focused on combatting the health crisis and the economic fallout of the measures adopted to contain the spread of the virus until the country is on the path towards a solid and sustained recovery. A major factor in this regard will be the economy's ability to mobilise and assign in an efficient manner the European reconstruction funds (*Next Generation EU*), insofar as they can decisively help the recovery and raise the growth potential.

BANKING SECTOR AS PART OF THE SOLUTION TO THE HEALTH CRISIS

The risks to financial stability have risen following the outbreak of the pandemic, although they have been attenuated somewhat by the monetary, fiscal and prudential measures adopted. Against this backdrop, the Spanish banking sector is playing a key role in mitigating the economic impact of the crisis, by extending the financing required by households and companies. In fact, the sector is starting from a much more solid position compared to the aftermath of the global financial crisis in 2008, supported by a better-quality balance sheet, a sound liquidity position and the considerable reinforcement of capital ratios, all thanks to a large extent by the regulatory reforms implemented over the past decade.

Bank lending to the private sector has grown in 2020 for the first time since the financial crisis of 2008, spurred on by the measures backed by governments and regulatory bodies, including the legislative and sector-wide moratoriums and the programmes to provide liquidity to companies and the self-employed. These new flows towards production activities, supported by ICO-backed guarantees which have mobilised in excess of EUR 110,000 million in loans (equivalent to 9% of Spanish GDP), have been key to expand lending and meet the liquidity needs of the companies hardest-hit by the pandemic. Additionally, the decline in household financing has slowed, thanks to the uptick in new mortgage lending, which has offset the slowdown in consumer loans. Lastly, the NPL ratio has remained steady thanks to the support measures implemented (payment moratoriums), as the above-mentioned expansion of lending, which stood at 4.57% in October, -22 bp over the year.

As regards new business, bank deposits have climbed at a faster pace (+9.5% year-on-year), driven by the increase in household savings, which reached an all-time high, and the accumulation of liquidity by companies in the face of the uncertainty triggered by the health crisis. Investment funds, which were subjected to major corrections in the financial markets at the outset of the crisis, have fully recovered all the outflows suffered in the first quarter.

The fall in net interest and fee and commission income and the rise in asset impairment ahead of the potential negative impact of the pandemic on credit quality have led to a sharp decline in banking results during the year. The outlook in terms of profitability has deteriorated due to the downward revisions to growth forecasts and the fact that interest rates will remain at minimum or negative levels for longer than expected. In this context and in view of the limitations to secure greater revenue generation, a reduction in operating expenses is shaping up as the realistic alternative to improve efficiency and profitability. Mergers represent a useful tool to meet this objective, allowing for the creation of economies of scale and thus improving the ability of banking entities to take on other structural challenges, such as the digital transformation.

This therefore opens the door to a new process of consolidation within the European banking system. This is being pushed by regulatory bodies and supervisors, which have not only ramped up their messages of support for mergers in recent months, but have actually gone one step further by relaxing merger conditions and, most importantly, easing up on the minimum capital requirements of the resulting entities. The overall aim is to strengthen the resilience of the sector and its capacity to continue supporting the real economy. This process, which is confined to each nation state at this stage (due to the generation of greater synergies domestically, among other factors) is being led by the Spanish banking sector, where there are two major corporate deals in the final stage: Caixabank-Bankia, which will give rise to the creation of Spain's largest bank with over EUR 660,000 million in assets and Unicaja-Liberbank. As regards the possible impact of consolidation on competition, the Bank of Spain still believes that there is room for further mergers. The degree of industry concentration, as measured by the Herfindahl and Hirschman Index (HHI) and including the two transactions mentioned above, would still be within the range of "moderate concentration".

The far-reaching regulatory and supervisory response to the impact of the health crisis has acted as a crucial support for the banking industry. Both domestically and internationally, temporary measures on a micro-prudential, accounting and macro-prudential scale have been adopted to ensure that banking institutions continue to provide financing to solvent households and companies. Of note among these measures are those that aim to make the prudential treatment and application of accounting standards to NPLs, refinanced exposures and provisions more flexible; an urgent quick-fix review of the European banking rules on capital requirements in order to absorb the disruption suffered by banks and to strengthen capital ratios; measures to alleviate capital and liquidity requirements; and other measures related to relaxing macro-prudential matters. These measures, coupled with restrictions on the distribution of dividends, have led to an improvement in the capital levels of Spanish banks, which now present a high loss-absorption capacity, as reflected by the latest Bank of Spain stress tests.

b) 2018-2020 Strategic Plan

In February 2018 Bankia showcased its Strategic Plan 2018-2020, which laid out its ambitions to become the best bank in Spain in terms of capital ratios, efficiency and profitability.

The four cornerstones underlying this roadmap are the integration with Banco Mare Nostrum (BMN), efficiency and cost control, growth in revenue through greater sales of high-value products, and a faster reduction in NPAs.

The plan's financial and management targets were calculated based on a macroeconomic scenario with forecast growth for Spanish GDP of over 2% in 2020, a Euribor rate of 0.73% at the end of the period, and a scenario of gradual recovery in lending.

The Strategic Plan 2018-2020 envisaged reaching a profit after income tax of EUR 1,300 million at the end of the period, a fully loaded CET1 capital ratio of 12%, a ROE of 10.8% adjusted to a fully loaded CET1 ratio of 12% and an efficiency ratio of under 47%. It was also expected that the non-performing asset ratio would be below 6% and the net NPA ratio would be below 3%.

One of the targets was also to distribute EUR 2,500 million to shareholders after raising the payout ratio to 45%-50% and reintegrating the capital surplus back into the fully loaded CET1 capital ratio of 12%.

To increase revenues, the Strategic Plan included a 5% increase in retail customers (a rise of 400,000) and 20% growth in business customers (a rise of 12,500), an improvement in its market share in mortgage lending (from 7.3% to 10.8%), in corporate lending (from 6.9% to 7.7%), in consumer loans (from 5.5% to 6.6%), in

investment funds (from 6.4% to 7.2%) and in payment methods (from 8.1% to 9% in credit cards), among other business segments.

In terms of synergies, the Plan reflected an amount of EUR 190 million from the merger with BMN in 2017.

The sudden emergence of the COVID-19 pandemic and the rolling forward of negative interest rates for longer than expected have impacted the attainment of the financial targets set by Bankia in 2018. However, Bankia has successfully met the targets that are related directly to the management of the bank in its roadmap.

Over and above the financial parameters, the Strategic Plan 2018-2020 made a firm commitment to digitalisation, including a EUR 1,000 million investment in technology, of which over half were earmarked for model transformation. The targets included raising purchases through online channels to 35% and to reach a digital customer quota of 65% by the end of 2020.

It also envisaged an improvement in team engagement, with a target of 40% of all management positions to be held by women at the end of the three-year period.

To make progress on social recognition, Bankia placed emphasis on education and employment through Fundación Bankia por la Formación Dual (Dual Vocational Training Foundation); the environment (through an Eco-efficiency and Climate Change Plan) and responsible digitalisation (through improvements in cybersecurity and the privacy of customer data).

EVOLUTION OF MANAGEMENT TARGETS

Efficiency and cost control

	2020	2019	2018	Strategic Plan
Synergies (EUR million)	220	220	230	190

Customers

	2020		2019		2018		Strategic Plan	
	Retail customers	Business	Retail customers	Business	Retail customers	Business	Retail customers	Business
Satisfaction	83.3%	93.4%	90.3%	93.6%	86.9%	93.6%	92%	95%

Digitalisation

	2020	2019	2018	Strategic Plan
Digital customers (% of total customers)	60.5%	53.3%	45.4%	65%
Digital sales	46.9%	36.0%	25.8%	35%

Share of performing loans and high-value products/segments

	2020	2019	2018	Strategic Plan
Companies	8.17%	7.83%	7.42%	7.7%
Consumer	5.58%	6.08%	5.58%	6.6%
Investment funds	7.51%	7.05%	6.56%	7.2%

Mix of stock of performing loans

	2020	2019	2018	Strategic Plan
Housing	57%	61%	64%	58%
Consumer	4%	5%	4%	5%
Business and developer	39%	34%	31%	37%

Balance sheet quality

	2020	2019	2018	Strategic Plan
Reduction of NPAs (EUR million)	8,300	8,400	10,900	8,900
	2.98%	3.3%	4.3%	<3.0%
NPL ratio	4.7%	5.0%	6.5%	<4.0%
Coverage ratio	58.2%	54.0%	54.6%	56.0%

Generation of capital

	Period 2018-2020	Strategic Plan
Accumulated surplus capital (EUR million)	2,932	2,500

1. Surplus capital over the 12% fully loaded CET1 ratio at December 2020 (excluding unrealised sovereign gains) of EUR 2,226 million, plus EUR 706 million paid in dividends during the Strategic Plan period.

c) Evolution of the 2019-2020 Responsible Management Plan

Since 2016, Bankia has been implementing specific responsible management plans aligned with the bank's strategic plans. In 2020, the bank completed its 2019-2020 Responsible Management Plan (RMP), with 82.4% of initiatives either completed or progressing favourably. Highlights among the Plan's objectives include the following: preventing social, environmental and good governance risks and supporting management through greater controls of processes to respond effectively to stakeholder expectations.

2019-2020 RESPONSIBLE MANAGEMENT PLAN

The RMP, predicated on sound corporate governance, has four strategic lines of action: Satisfaction and relationship with customers; Sustainable development and transition to a low-carbon economy; Developing talent and employee engagement; and Supporting society. Under these areas, in 2020 a total of 51 projects or initiatives containing 100 specific goals and involving 20 divisions of Bankia were carried out.

Bankia has a specific dashboard for monitoring the 2019-2020 Responsible Management Plan, with quarterly reporting to the Responsible Management Committee and every six months to the Appointments and Responsible Management Committee, which is attached to the Board of Directors. This latter Committee is composed of four independent directors and is chaired by the independent coordinating director. This ongoing monitoring enables decisions to be made based on the results obtained, as well as the drafting of action plans.

Highlights of the initiatives rolled out in 2020 include:

Strategic lines of action	Initiatives delivered
 <p>CUSTOMER SATISFACTION AND CUSTOMER RELATIONSHIP</p> <div> <div>1</div> <div>2</div> <div>3</div> </div> <p>LISTENING AND ADAPTATION TO THE CUSTOMER CUSTOMER EXPERIENCE DATA SECURITY / PRIVACY</p>	<ul style="list-style-type: none"> Gathering the opinion of customers and stakeholders at every stage of the product marketing process. Developing a privacy panel within the Bankia App that users can configure to manage their consents online. Establishing a standardised written communication model for customers. Driving actions and external awareness initiatives around cybersecurity and fostering a culture of safe online habits.



TALENT AND COMMITMENT



- Implementing training and development actions that promote diversity and facilitate the appointment of women to positions of responsibility.
- Rolling out the Well-being Programme to improve the physical, mental and emotional health of personnel.
- Launching the Agile Project.
- Developing a new talent and development management model.
- Continuing to gauge employee satisfaction through focus groups.
- Driving the social engagement of professionals through the digitalisation and alignment of actions with the 2030 agenda in order to foster volunteering and collaborative projects.



SUSTAINABLE DEVELOPMENT AND TRANSITION TO A LOW-CARBON ECONOMY



- Finalising the initiatives contained in the 2017-2020 Eco-efficiency and Climate Change Plan.
- Reducing emissions and fully offsetting those that are unavoidable.
- Ensuring all electricity is acquired from renewable sources.
- Defining an internal carbon pricing strategy.
- Upsizing the portfolio of products/services that contribute to social development and care of the environment.
- Approving a sustainable product framework: Defining internal criteria and traceability on the systems.
- Assessing ESG risks in transactions.
- Fostering a platform to manage carbon credits associated with environmental projects for both buyers and sellers.



SUPPORT FOR SOCIETY



- Creating a free self-diagnostic tool for NGOs looking to analyse their level of transparency and digitalisation.
- Launching calls for environmental aid applications.
- Developing Bankademia, an online tool to make society aware of financial concepts and realities.
- Developing Empleo en Red, a programme that offers customers employment guidance and helps them to actively seek work.
- Offering employment to the most vulnerable: programmes that facilitate access to the labour market for most vulnerable groups, such as young people and those over 45.
- Formación Profesional Dual: fostering and improving vocational training generally, but especially dual-track vocational training.
- Carrying out seven social and environmental collaborative financing projects among employees.



- Disseminating the Bankia Code of Ethical Conduct to third parties.
- Rolling out specialised training for managers on non-financial risks.
- Defining and establishing a governance model that respects human rights, bearing in mind the National Companies and Human Rights Plan. Establishing a due diligence process.
- Innovation Observatory: Identifying sources of innovation and emerging technologies.
- Innovation laboratory: Identifying areas within the bank where new solutions could be harnessed. Management of Innovation Lab: Supporting entrepreneurship to develop the best solutions.
- Disseminating training clips internally on responsible management and SDGs.
- Fomenting sustainable communication through bite-sized internal and external communications.
- Proactively forging relationships with analysts, investors and proxy advisors.
- Scaling up the frequency of contact with investors and shareholders to facilitate and update information on a proactive basis, thus fostering transparency and reciprocity.
- Increasing the percentage of active suppliers on the Supplier Portal which have been analysed in terms of ESG risks.

RESPONSIBLE MANAGEMENT GOVERNANCE STRUCTURE

Bankia created its first responsible management committee in 2015, making a firm commitment to sustainability and the inclusion of environmental, social and good governance criteria in the management of the bank. The committee's duties include promoting, coordinating and developing all the responsible management initiatives.

The committee normally meets on a quarterly basis and is made up of executives from the units of the bank that are in the most direct contact with stakeholders deemed a priority. This way the committee can ascertain which have the greatest influence on the bank and promote the corresponding initiatives and projects that best respond to their interests and needs. The bank then ensures that they are included in Bankia's strategy through the Responsible Management Plan.

The General Directorate of Communication and External Relations chairs the committee, while the secretariat of the committee is run by the Responsible Management Department, which is in charge of analysing trends, making proposals, and coordinating and driving Bankia's responsible management.

GOVERNANCE STRUCTURE OF THE RESPONSIBLE MANAGEMENT



Topics analysed, reviewed and, where appropriate, approved by the Responsible Management Committee in 2020 included:

- Quarterly follow-up of the 2019-2020 Responsible Management Plan.
- Analysis of the risks and opportunities around the Sustainable Development Goals (SDGs).
- Identification of projects, indicators, objectives etc. for each of the SDG priority areas.
- Follow-up of SDG projects through quarterly reports.
- Guidelines for the integration of environmental, social and good governance criteria (ESG) in corporate policies and the updating thereof, such as the Responsible Management Policy and the Human Rights Policy.
- Renewal and adaptation of the Responsible Management Conventions Policy.
- ESG analysis of the main sustainability indices and/or non-financial analysts, such as the Dow Jones Sustainability Index and CDP.
- Analysis of the sustainable financing framework.
- Analysis of the entity's reputational risk.
- Diagnostic assessment of the adaptation to the recommendations issued by the Task Force on Climate-related Financial Disclosures (TFCD).
- Follow-up of the responsible management conventions.
- Review of the non-financial information control system.

MATERIALITY

Listening and talking to stakeholders is an ongoing priority for Bankia, which took on even greater prominence after the first responsible management plan was launched in 2016. Bankia channels this listening process through a materiality analysis and periodically updates and establishes priorities with respect to stakeholders' expectations.

The entity carries out the materiality analysis every two years; it was last carried out in 2019 in order to identify the most important aspects for stakeholders: customers, shareholders, bank professionals, suppliers and society as a whole in the geographical regions where Bankia has the greatest footprint. This analysis was carried out by an external consulting team, engaged to ensure the confidentiality of the interviews and the accuracy of the findings, which carried out more than 2,200 consultations (in-depth interviews, online consultations and round table discussions). As a result, the most relevant environmental, social and governance (ESG) topics were prioritised from a dual internal and external perspective.

The materiality analysis enables Bankia to draw up a roadmap that details the most important topics, how important each topic is and to whom they are of interest or whom they impact. The priority topics include: information security and privacy, ethics and integrity, transparency of information and corporate governance. Among these, priorities include responsible marketing, and solvency and liquidity.

Materiality matrix



For a number of years now, Bankia has integrated the risk variable into the materiality analysis to identify stakeholders' tolerance, confidence and attitudes if their expectations are not met in relation to each topic. This allows the entity to promote action plans that minimise the potential related risk. The assessment also presented trends in the topics assessed in the previous materiality assessment performed by Bankia in 2017.

All knowledge gathered from the materiality analysis has enabled a swifter and more immediate response to the new reality in 2020 in the wake of the COVID-19 pandemic, which now serves as a key underlying factor that influences relationships with stakeholders and day-to-day operations.

This "new normal" for society as a whole, which includes the above-mentioned challenges already assumed by Bankia, also implies greater restrictions, fewer resources and new urgent hurdles to be overcome. These are being addressed through the bank's commitment to becoming a financial engine for economic and social solutions, through the ramping up of digitalisation and the adaptation of the business.

Bankia is a company that listens and engages in dialogue with stakeholders; it incorporates its knowledge of the non-tangible elements of its business into its strategy. As such, it has managed to concentrate effort and resources on the internal and external priority areas triggered by the health crisis. As explained throughout this report, Bankia has put in place a series of measures in addition to those approved by government and the public administrations. These measures aim to respond to the financial needs of its retail, self-employed, SME and corporate customers, to protect the health of its professionals and customers and to support the bank's suppliers through measures that alleviate their financial burden.

GLOBAL COMPACT



Bankia is firmly committed to the 10 principles of the UN Global Compact, of which it has been a signatory since 2013.

These universally accepted principles are key values based on declarations by the United Nations in the areas of human rights, labour legislation, the environment and anti-corruption.

As part of its involvement, Bankia reports annually to the Global Compact on its progress implementing the related policies and initiatives.

PRINCIPLES OF THE SPANISH NETWORK OF THE GLOBAL COMPACT

1	SUPPORT AND RESPECT THE PROTECTION OF HUMAN RIGHTS	HUMAN RIGHTS	STRATEGY: <ul style="list-style-type: none">• 2019-2020 RESPONSIBLE MANAGEMENT PLAN RESPONSIBLE BANKING: <ul style="list-style-type: none">• ETHICS AND INTEGRITY• HUMAN RIGHTS
2	NOT BE COMPLICIT IN HUMAN RIGHTS ABUSES		
3	UPHOLD THE FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING	LABOUR	RESPONSIBLE BANKING: <ul style="list-style-type: none">• ETHICS AND INTEGRITY• PEOPLE AND TALENT MANAGEMENT• HUMAN RIGHTS
4	UPHOLD ELIMINATION OF ALL FORMS OF FORCED AND COMPULSORY LABOR		
5	UPHOLD THE EFFECTIVE ABOLITION OF CHILD LABOR		
6	UPHOLD THE ELIMINATION OF DISCRIMINATION		
7	SUPPORT A PRECAUTIONARY APPROACH TO ENVIRONMENTAL CHALLENGES	ENVIRONMENT	STRATEGY: <ul style="list-style-type: none">• 2019-2020 RESPONSIBLE MANAGEMENT PLAN RESPONSIBLE BANKING: <ul style="list-style-type: none">• SUSTAINABLE FINANCING COMMITMENT TO THE ENVIRONMENT
8	UNDERTAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY		
9	ENCOURAGE THE DEVELOPMENT AND DIFFUSION OF ENVIRONMENTALLY FRIENDLY TECHNOLOGIES		
10	WORK AGAINST CORRUPTION IN ALL ITS FORMS	ANTI-CORRUPTION	ROBUST AND SECURE: <ul style="list-style-type: none">• INTERNAL CONTROL AND COMPLIANCE RESPONSIBLE BANKING: <ul style="list-style-type: none">• ETHICS AND INTEGRITY

Moreover, to foster the integration of these principles into business operations, the Global Compact encourages and raises awareness among businesses about the importance of promoting actions in support of the Sustainable Development Goals (SDGs).

**RELATIONSHIP BETWEEN THE PRIORITY SDGS FOR BANKIA
AND THE 10 PRINCIPLES OF THE GLOBAL COMPACT**



COMMITTED TO THE SDGs



In 2015, the United Nations member countries adopted the 2030 Agenda for Sustainable Development. The Agenda contains 17 Sustainable Development Goals (SDGs) and 169 targets and is a call for action by all countries, organisations and society at large to end poverty, fight inequality, protect the planet and act on climate change, among others.

In its firm commitment to this United Nations initiative Bankia has undertaken to foster the SDGs. As a financial institution, it focuses its efforts on promoting a transition towards a low-carbon economy and carrying out responsible and sustainable banking. Bankia has instrumented these efforts and its challenges in an SDG contribution strategy.

This strategy has enabled the entity to identify specific plans, programmes and measures that promote the bank's actions towards achieving the 2030 Agenda targets.

In line with its operations, Bankia gears efforts towards four priority SDGs: Quality education (SDG 4), Decent work and economic growth (SDG 8), Sustainable cities and communities (SDG 11), Climate action (SDG 13), and one cross-cutting target, Partnerships for the goals (SDG 17).



To drive each SDG, Bankia has drawn up strategic lines, with targets and actions laid out in its Responsible Management Plan so it can track progress on implementing the 2030 Agenda.



Quality financial education: Bankia has a firm commitment to the training and financial literacy of Spanish society, an inclusive and quality education that promotes the knowledge and skills necessary for better personal and professional management, as well as improving access to employment and entrepreneurship. It earmarked over EUR 3 million for education projects and projects to improve employability in 2020.

Bankia is the only financial institution with its own dual vocational training programme, enabling it to add 28.6% of students trained in the first three programmes to its staff and making the programme a source of hiring internal talent.

In 2016, it created the Bankia Foundation for Dual Training, designed to be a nexus between the academic and business worlds and drive the employability of younger people. The foundation's activity has intensified in recent years, delivering 96 training programmes in 2020 to over 4,560 people, and signing over 440 collaboration agreements with companies and 308 with educational institutions.

Through Bankademia, whose website received almost 470,000 visits in 2020, Bankia offers free online courses to customers and non-customers on basic finance, housing, the family economy and SMEs. The aim is to promote financial literacy and help people to understand the products and services and to take financial decisions. Through the Bankia Blog, which received over 3.3 million visits in 2020, the bank aims to foster an inclusive financial culture.

Bankia also offers specific programmes for non-profit organisations, including most notably the Spanish Red Cross, Cáritas, Integra, Secot and the Randstad Foundation, to foster employment programmes in high-demand sectors and to promote the employability of the most vulnerable groups, helping over 51,600 people in this way in 2020.



Inclusive economic growth: As a financial institution, Bankia provides decent employment, guaranteeing befitting conditions for both its professionals and its value chain, and encouraging entrepreneurship and career development. In 2020 100% of the Bankia workforce was on a permanent contract and received variable remuneration, while the bank made a contribution to the pension plan of 99.97% of its workforce.

Moreover, 125 professionals were promoted internally in 2020, of which 52% were women. The bank is involved in various initiatives aimed at promoting women's equality, including the "Women's Empowerment Principles (WEP)", established by UN Global Compact and UN Women, and the Code of Principles on Generational Diversity (Generation and Talent Observatory), which seeks to promote development based on equality, irrespective of age.

Bankia also actively promotes financing for SMEs and self-employed professionals, with a self-employed lending volume in 2020 of EUR 417.7 million. Moreover, through a number of social programmes, the bank offers employment and labour integration projects that particularly target vulnerable groups (women, unemployed, people with different abilities and migrants), with more than 55,700 direct beneficiaries.



Sustainable cities and communities: Bankia promotes investment, financing and innovation in infrastructure and services that improve quality of life and sustainability of cities. The bank offers financing to individuals and companies so they have access to sustainable loans and mortgages and to the financial services needed for their personal and professional development, such as the 2019 agreement with the EIB to launch a pioneering line in Europe of EUR 300 million for the granting of green mortgages or a specific financing facility for developers to build BREEAM energy efficiency certified homes.

The bank also promotes the emancipation of young people. In 2020, the bank extended 6,513 mortgages amounting to EUR 695.54 million to first time buyers aged under 35. It also arranged over 300 social rents to protect the most vulnerable members of society. It also fosters sustainable mobility through the granting of loans and lease financing for the purchase of low-emission vehicles (hybrid and electric vehicles) in an amount of EUR 13.5 million and through an in-house fleet of vehicles, of which 97.13% are hybrid vehicles.

Through 378 branches with agricultural specialists, Bankia offers solutions geared toward agriculture and rural development, funding innovation and energy efficient projects in this sector. The entity provided financing to over 56,800 borrowers in the agricultural and livestock industries in 2020.

In this area, technology and digital transformation play key roles in finding sustainable solutions that can be applied to cities and rural areas to stop depopulation. In this vein, through social action the entity has invested EUR 5.8 million in local and rural development programmes of foundations and non-profit organisations with more than 605,000 direct beneficiaries and 506 projects supported.



Sustainable financing: Bankia's responsible management model includes respect for the environment and combatting climate change as two key variables that must be considered in the short and long term. To this end, it launched a 2017-2020 Eco-efficiency and Climate Change Plan. Highlights of its accomplishments include having reached neutral CO2 emissions in 2020 by fully offsetting all unavoidable emissions (emissions in scopes 1 & 2) and a 59.8% reduction in CO2 emissions with respect to 2018. This achievement saw the entity receiving the triple Calculate/Reduce/Offset seal from the Ministry for the Ecological Transition and Demographic Challenge. Bankia has also developed and implemented an internal strategy for setting an internal carbon price (ICP).

Business-wise, the bank markets sustainable mutual funds and invests in clean infrastructure and technologies. It has also launched a plan to gradually increase the weighting of assets managed under ESG criteria. In this regard, the bank is aiming to increase the weighting of these assets by 26%.

In terms of financing, the entity facilitated the mobilisation of EUR 18,675 million in green financing in 2020. Through the Sustainable Finance and Business Department, the entity has driven renewable energy projects - photovoltaic, solar thermal and wind power-, carrying out 26 transactions for a total value of EUR 734.43 million, in addition to fostering the creation of a sustainable financing framework and promoting the marketing of new green products and services.

Bankia has launched 11 calls for applications for environmental and sustainable development aid alongside our original foundations, supporting 49 projects that have a beneficial impact on the environment and biodiversity. In this regard, the bank has extended over EUR 480,000. To raise awareness, in 2020 the entity also launched a free digital tool that allows users to measure the carbon footprint that they produce on a daily basis, offering practical recommendations to offset and reduce it.

In the institutional field and firmly committed to decarbonising the economy, in September 2019 Bankia signed the UN's Principles for Responsible Banking and Collective Commitment to Climate Action. In 2020, the entity's mutual fund and pension manager, Bankia Asset Management, became a signatory to the Principles for Responsible Investment (PRI), also promoted by the UN, in order to incorporate environmental, social and good governance criteria into their investment decision-making processes.



Partnerships for the goals: For Bankia, establishing partnerships is key for sharing knowledge and promoting projects that contribute to the development of the SDGs.

Through industry groups and public-private partnerships, Bankia defends its stakeholders' interests in economic, social, environmental and corporate governance matters. These include alliances with different civil agents in Spain and internationally (Global Compact, UN, Spainsif, Forética, Fundación Alares, Fundación Ecodes, Fundación Seres, Fundación Corporate Excellence, Fundación LIMME,

COTEC, CECA and CEOE), and collaboration with public financial institutions (e.g. ICO, EIB and reciprocal guarantee companies, or SGR) to finance SMEs and mid-cap companies, the EIB "EIB Youth Employment" line to help young people, and the 44 agreements signed with cooperative and public institutions to foster financing to agricultural customers and to support this sector generally. There are partnerships with NGOs to promote environmental conservation and alliances in the field of innovation and in the fintech sector to foster sustainable development.

This commitment to the priority SDGs also enables Bankia to have a bearing on other secondary SDGs, such as: Gender equality (SDG 5); Affordable and clean energy (SDG 7); Industry, innovation and infrastructure (SDG 9); and Reduced inequalities (SDG 10) and tertiary SDGs for the entity, such as: End poverty (SDG 1); Responsible consumption and production (SDG 12); Life below water (SDG 14); and Peace, justice and strong institutions (SDG 16).



Major contributions to these secondary SDGs include:



- Supporting equality within Bankia: women occupy 23.08% of places on the Board of Directors, 43.24% of management positions and 56.25% of the entity's entire workforce in 2020.
- Signing institutional commitments, such as the Women's Empowerment Principles promoted by the UN.



- Driving forward renewable energies. Thanks to transactions entered into in 2020, the entity has financed the installation of 1,901.66 MW of photovoltaic, wind and solar thermal power.
- Fostering renewable energy internally: Bankia acquires all its electricity from renewable sources with guarantees of origin.



- Driving innovation in a collaborative ecosystem with startups: 80% of startups involved in the Fintech call for bids have entered into commercial agreements with Bankia to develop their projects.



- Supporting municipalities at risk of financial exclusion, providing services to 374 localities through Bankia ofibuses. Moreover, 16% of the entity's ATMs and branches are located in sparsely populated areas.
- Thanks to projects carried out through social action aimed at reducing poverty, the entity has helped over 255,800 in 2020, especially through the "Contigo 2 pueden ser 4" donation drive, in conjunction with the Federation of Food Banks.

3. ROBUSTNESS AND SECURITY

a) Solvency and liquidity

RESULTS

Bankia Group obtained attributable consolidated profit of EUR 230 million in 2020, down 57.6% on the prior year due to the fall in net gains on financial assets and liabilities, as well as the extraordinary provisions set aside for the situation caused by the COVID-19 pandemic, amounting to EUR 505 million.

The purpose of these extraordinary provisions was to further bolster the entity's balance sheet and provide greater flexibility to meet the potential needs of families and companies in the future.

Net interest income showed improved quarter-on-quarter performance throughout 2020 and amounted to EUR 1,904 million at year end, down 5.9% on 2019. This trend stems from the impact of the decrease in the yield curve, the change in mix of the loan portfolio, with the business segment accounting for a greater weight and lower consumer volumes, as well as the decline in the contribution of interest from the fixed-income portfolio.

In terms of income, net fees and commissions are up 12.2% year-on-year to EUR 1,213 million on the back of good performance in the retail business, assets under management and origination services.

The increased scope of the commission-free policy in the "Por Ser Tú" programme resulted in an 11.5% drop in income from fees and commissions for collection and payment services, insofar as the customers in that programme stopped paying for their cards.

Bankia's Group operating expenses also fell by 2% to EUR 1,781 million, representing 2.64% of total risk-weighted assets (RWAs) compared to an average 3.29% among comparable banks.

Lower costs and higher income from fees and commissions drove a 3.8% rise in core profit (net interest income and fees and commissions less operating expenses) to EUR 1,336 million at year end. Fourth quarter performance was particularly noteworthy, with year-on-year growth in core profit of 10.8%.

Excluding the extraordinary provisions for COVID-19, profit before tax amounted to Euros 816 million, up 8% on the prior year.

SOLVENCY AND LIQUIDITY

Bankia ended December with a fully loaded CET1 capital ratio of 16.12% if we apply the capital flexibility measures adopted by the competent bodies and authorities. Without them, the fully loaded CET1 capital ratio at the end of 2020 was 15.48%, compared to 13.02% at the 2019-year end, which shows solid capital generation and exceeds the regulatory minimum for 2020 by 710 basis points.

As regards solvency, the Group closed 2020 with a capital surplus over the 12% fully loaded CET1 capital ratio (excluding unrealised sovereign gains) of EUR 2,226 million, which, combined with the dividends paid out (EUR 706 million), means the Group exceeded its EUR 2,500 million target set in the Strategic Plan.

The Group also has an ample liquidity buffer to face the situation and continue financing the economy, having taken over EUR 22,900 million from the ECB's TLTRO III facility and increased the liquidity coverage ratio (LCR) to 195%.

STRENGTHENING THE BALANCE SHEET

In 2020 Bankia Group reduced the net non-performing assets ratio to 2.98%, meeting the target set in the 2018-2020 Strategic Plan of bringing it below 3%.

The NPL ratio is down from 5% in 2019 to 4.7% and the coverage ratio is up 4.2 percentage points compared to December 2019, reaching 58.2%.

COMMERCIAL ACTIVITY

Against a difficult backdrop this year, the entity provided support to its customers, extending almost EUR 11,000 million in ICO-backed loans to the self-employed, SMEs and businesses. It also granted 49,000 payment holidays for mortgages and 61,500 for consumer loans.

The outstanding amount of payment holidays granted to individuals for mortgages was EUR 4,261 million, representing 7% of Bankia's Group total performing mortgage loans. The outstanding amount of payment holidays granted to individuals for consumer loans was EUR 79 million, representing 2% of total performing consumer loans.

The entity also continued to actively participate in the government's ICO (Official Credit Institute) guarantees programme, taking up a share of 9.4% with a total lending volume of EUR 10,941 million (EUR 8,100 million secured by guarantee).

This represents 26% of the bank's total lending to businesses.

In this respect, Bankia's share of the stock of business loans stood at 8.17%, up 34 basis points year-on-year.

This all enabled vast growth in the stock of business loans, which rose by 17% or EUR 6,100 million to a total of EUR 42,600 million at the end of 2020.

As regards the performance of the retail business, the entity closed the last quarter of the year with a record number of mortgages signed, with further inroads made in the recovery of consumer lending,

which continued to show a gradual upturn this quarter. Mortgages arranged totalled EUR 337 million in the last quarter of the year, up 43.5% on the previous quarter but still 54.1% down on the prior year. Mortgage lending amounted to EUR 1,229 million in the whole year (-53.6% compared to 2019).

One of the strengths of Bankia's Group activity in recent years has been the growth in its position in high-value products for customers, such as investment funds. Bankia's Group fourth quarter performance in new business was excellent and, despite the difficult climate, the entity ended the year as leader in new business among the major Spanish banks.

Assets managed and marketed total approximately EUR 24,000 million at the end of 2020, up 7.3% on the EUR 22,300 million one year earlier.

In this regard, the bank's market share grew by 46 basis points compared to December 2019, reaching 7.51% and comfortably exceeding the 7.2% target set in the 2018-2020 Strategic Plan.

The gradual recovery of the retail business was also reflected in the performance of pension plans and new insurance production. Assets managed and marketed in pension plans showed annual growth of 1.7% and in insurance new production rose 83.8% compared to Q3 2020.

Considerable advances were made in customer digitalisation in 2020. At year end the entity's digital customer portfolio accounted for 60.5% of the total, versus 53.3% in 2019. Four million Bankia Group customers maintain a digital relationship with the bank.

Digital sales already make up 46.9% of the total, the bank's highest ever proportion. This is 11 percentage points more than in 2019 and above the 35% target set in the 2018-2020 Strategic Plan.

b) Internal control and compliance

Bankia Group has internal control and compliance risk management systems that ensure compliance with applicable regulations and good banking practices. Compliance risk management is a strategic pillar to which the entire organisation is committed. In the wake of the myriad regulatory developments, highlights in recent years include projects to implement the new regulations approved in payment methods (PSD2) and markets in financial instruments (MiFID II), in addition to data protection and privacy (General Data Protection Regulation) and the new regulation on real estate credit agreements (LCCI).

CRIMINAL RISK PREVENTION

According to the Spanish Criminal Code, legal persons can be criminally liable for crimes committed in their name or on their behalf which result in a direct or indirect benefit to them. Such liability can derive from crimes committed not only by directors, legal representatives or those with decision-making power in the company, but also by any other person who was able to commit a crime as a result of a serious failure by those charged with governance in the exercise of their supervision, monitoring and control duties.

To this end, Bankia has a criminal risk prevention model, aligned with sector best practice, which enables it to identify activities that require monitoring to avoid conduct that could give rise to criminal acts and to ensure compliance with its Code of Ethics and Conduct. In this respect, Bankia has a Crime Prevention and Detection Policy which sets out the body of mandatory regulations in Bankia in relation to crime prevention.

The model is based on identifying potential punishable acts for which the entity could be criminally liable and the activities carried out by the entity where such acts might occur, as well as the detection, implementation and periodic execution of specific controls to mitigate these acts. The results of executing these controls are reported annually to the Audit and Compliance Committee and the Board of Directors.

Bankia has a systematic model for management and control of regulatory compliance risks, designed to identify, assess, manage and monitor all risks of failure to comply with prevailing regulations applicable to investment and banking services, anti-money laundering and personal data protection. This management and control model is based both on the governance structure and on processes and technology to help improve business processes and performance measurements, as well as to provide the entity with information so it can consider these risks in its decision-making.

The Corporate Regulatory Compliance Directorate assumes the functions of the unit responsible for crime prevention. The mission of the Crime Prevention Unit is to identify the entity's specific risks, evaluating, analysing, implementing, improving and monitoring the crime prevention and detection system in order to prevent criminal liability on the part of the Company.

Its duties include: defining and updating the criminal risks map, upgrading control and monitoring measures, advising senior management, collaborating in the design of training plans, coordinating the external and internal management of risks and controls, and presenting monitoring reports, at least once a year, in order to evaluate the compliance and effectiveness of the model for the Audit and Compliance Committee and, if necessary, the Board of Directors.

	2020	2019
No. of employees trained in criminal risk prevention	219	273

RESPONSIBILITY AND REGULATORY COMPLIANCE PERFORMANCE

The Corporate Regulatory Compliance Directorate is charged with management, performance and control of these matters. It has two executive committees of its own, which meet monthly to address priority issues that require closer supervision.

There is the Bankia Internal Control Body (ICB), which is the Anti-Money Laundering, Counter Terrorist Financing and Sanctions Committee. In addition to ensuring compliance with the regulations in force, its purpose is to enhance the bank's governance in this field by involving the business areas, raising their awareness, and enabling the entity to speed up its decision-making, shortening the time for reporting to Spain's anti-money

laundrying supervisory authority, Servicio Ejecutivo de la Comisión de Prevención del Blanqueo de Capitales e Infracciones Monetarias (SEPBLAC).

This Committee reports regularly to the Audit and Compliance Committee and the Board of Directors. It comprises the directorates from the entity's main areas, especially its business areas. They receive appropriate training and the necessary support to perform their duties on the Committee.

There is also the Regulatory Compliance Committee, which assesses and manages risks of non-compliance with regulations governing the bank's operations. Its scope of action includes the following duties:

- Identifying, assessing and managing compliance risks related to operations, executing the controls in place.
- Proposing the approval of codes of conduct and verifying the level of compliance.
- Drafting internal policies, procedures and rules for its scope of action, overseeing effective compliance therewith.
- Monitoring regulations of competitors and their implementation.
- Monitoring compliance with supervisors' requirements.

ANTI-MONEY LAUNDERING AND COUNTER TERRORIST FINANCING

The Bankia Group is acutely aware of the importance of this issue and the role of financial institutions and other economic agents in its prevention. The Group therefore emphasises its maximum collaboration with the competent authorities, joining forces with the rest of the Spanish financial system to combat all forms of money laundering and terrorist financing.

The Bankia Group's commitment is embodied through mandatory rules and procedures aimed at:

- Complying with prevailing anti-money laundering legislation at all times and the recommendations issued by international bodies, the Financial Action Task Force (FATF), and national and international authorities.
- Establishing customer acceptance policies and know your customer procedures.
- Implementing codes of conduct and adequate control and reporting systems to prevent its units from being used for the purposes of money laundering and terrorist financing.
- Duly retaining documents such as those identifying and justifying the customer's activity, purpose and type of business relationships for the length of time required under applicable regulation.
- Imbuing and ensuring a culture of prevention and regulatory compliance among all Group employees through specific and effective training plans, as well as other measures for this purpose.
- Supervising the Group's activities through internal and external audits in order to verify the proper functioning of the anti-money laundering/counter-financing of terrorism system.

To this end, Bankia has a Global Policy for the Prevention of Money Laundering and the Financing of Terrorism, which is reviewed and updated periodically in line with any organisational, legal and functional changes in the Group. These changes are approved by the Prevention of Money Laundering and the Financing of Terrorism Committee and the Board of Directors in accordance with the validation and approval procedure set out in Bankia's body of regulations.

Bankia applies anti-money laundering procedures in activities, areas and sectors with a higher risk of exposure to money laundering, which are approved by the Prevention of Money Laundering and the Financing of Terrorism Committee. These procedures are detailed in specific anti-money laundering manuals.

This policy and the specific manuals ensure that:

- Appropriate internal control measures and control and reporting bodies are in place, providing written approval of adequate policies and procedures on due diligence, information, document retention, internal control, risk assessment and management, compliance and reporting to prevent and stop transactions related to money laundering and terrorist financing.
- Know your customer procedures are carried out, with express risk-based customer acceptance policies, applying due diligence in the identification, understanding and acceptance of customers.
- Personnel responsible for anti-money laundering regulatory compliance are in place.
- All legal requirements are met regarding the procurement and retention of customer identification documents, and the recording and reporting of transactions.
- Adequate control methods are developed and put into practice to detect suspicious activities, examine them, and adopt the appropriate measures.
- An internal procedure is created for employees, management and agents to report possible infringements anonymously.
- The internal control procedures are based on a preliminary risk analysis, which is detailed in the risk self-assessment report and reviewed periodically.
- The different entities of the bank shall be classified by risk level, designing and implementing measures and controls to mitigate the risk.
- A specific risk analysis is performed and documented prior to the launch of a new product, service, distribution channel or technology, applying the necessary risk management measures.
- Risk analysis is performed on the inherent characteristics of the customer. These will be classified by risk level in order to design and implement measures and controls to mitigate the risk.
- The internal bodies set up for such purpose are expressly informed of any events or transactions which are suspected or known to be related to money laundering or terrorist financing.
- The entity refrains from carrying out suspicious transactions. Where refraining from carrying out such transactions is impossible or might frustrate the investigation, the entity may carry out the transaction and shall immediately issue a detailed report of the reasons therefor, in addition to completing the pertinent sections of the suspicious transaction report.
- The entity collaborates with SEPBLAC or other authorities, facilitating the information required by such body in the exercise of its duties.
- Anti-money laundering and counter-financing of terrorism training programmes are in place.
- Audit and quality systems in relation to the anti-money laundering policies and procedures are in place.
- The duty of confidentiality is established, prohibiting disclosure of the actions being carried out, except regarding the internal anti-money laundering bodies in place.

The reporting of suspicious money laundering transactions to SEPBLAC, responses to SEPBLAC requests for information, and the issue of the monthly transaction report and the financial holdings file will be carried out centrally by the Group's representative to SEPBLAC.

In light of the global pandemic, in May 2020 the Financial Action Task Force (FATF), whose mission is to develop policies to help prevent money laundering (ML) and the financing of terrorism (FT), published the guide "*COVID-19-related Money Laundering and Terrorist Financing Risks and Policy Responses*" to combat new financial crime risks emerging as a result of the COVID-19 crisis.

The pandemic has changed behaviour in the financial world, with a rise in remote transactions and digital services, as well as the greater need for financing during a prolonged recession. This could cause an increase in crimes such as identity theft, counterfeit healthcare supplies, fraudulent charity organisations and the inclusion of new unregulated financial services, which might involve organised crime.

The FATF recommendations in this climate are as follows:

- Remain alert to new ML/TF risks in order to effectively mitigate such risks, and detect and report any indications of suspicious activity.
- Incorporate the use of new technology and digital identification systems.
- Regarding the delivery of aid through non-profit organisations (NPOs), ensure that the legitimate NPO activity is not unnecessarily delayed, disrupted or discouraged, without incurring ML/TF risks.
- Evaluate the incorporation of new technologies to facilitate a swift and effective adaptation following the recommendations or regulatory changes made by authorities and supporting agencies.

In Spain, the 5th Anti-Money Laundering Directive on preventing the use of the financial system for money laundering or terrorist financing approved by the European Union was expected to be transposed into Spanish law in 2020. However, the prevailing legislation has yet to be adapted, which resulted in the European Commission opening infringement procedures against Spain, and seven other countries (Cyprus, Hungary, Netherlands, Portugal, Romania, Slovakia and Slovenia), for failure to notify application of the new measures.

	2020	2019
No. of employees trained in anti-money laundering and counter terrorist financing	7,452	999

REGULATORY DEVELOPMENTS IN INVESTMENT SERVICES

Following the entry into force of Markets in Financial Instruments Directive 2004/39/EC (MiFID), the rules of conduct were stiffened to increase market transparency and investor protection. European and Spanish regulation of investment firms has undergone gradual changes over the past decade. Its objective is to enhance quality in the distribution of the various investment services, offer greater investor protection and obtain a competitive advantage from its development.

MiFID II, which regulates the authorisation and operating conditions for investment firms, alongside MiFIR, which regulates pre- and post-trading transparency with regard to the competent authorities and investors, the requirements and obligations affecting data reporting services providers, establishes the trading obligation for derivatives in trading venues and certain supervisory arrangements. These constitute the regulatory framework for financial markets and instruments.

MiFID II requires investment services to be provided within a framework of high-level protection for investors, which involves the adoption of a number of measures aimed at enhancing such protection:

- Classification of customers based on their knowledge, qualifications and experience as investors.
- Classification of products. The main investment products regulated by MiFID are investment funds, shares (equities), fixed-income securities and derivatives; and, depending on their degree of complexity and associated risks, they are classified as complex or non-complex.
- Suitability and appropriateness tests, meaning that financial institutions must know their customers' expectations and preferences when making investments.
- Customer information must be fair, clear and non-misleading so that the customer understands the nature and risks of the service or product, as well as the expenses involved. This extends to marketing communications; pre-contract information (description of products and policies on asset protection, conflicts of interest and execution of orders, which must be delivered to customers, so they can make their investment decisions); contracts; and post-contract information (content and frequency of statements and confirmations of orders).

To this end and in compliance with applicable legislation, Bankia has adopted the MiFID Regulatory Framework, including the following 13 policies with the aim of offering adequate protection within the framework of the Securities Market regulations:

1. Order management policy.
2. Order execution policy.
3. Customer asset protection policy.
4. Policy on managing conflicts of interest in the provision of investment services.
5. Incentives policy.
6. Post-contract information policy.
7. Policy on the recording of conversations and electronic communications.
8. Investment reports management policy.
9. Investment services register policy.
10. Policy on the underwriting, allocation and placement of issues.
11. Policy on the assignment of classes of shares and/or units in collective investment undertakings.
12. Algorithmic trading policy.
13. Policy on the qualifications of relevant persons.

Bankia has continued to work on bolstering its investment product distribution model with a view to offering customers greater protection, quality service and added value. To do so, advances have been made in various key lines of action:

- Continuous training of employees who provide information and advice about investment products: a high percentage of Bankia staff are trained in MiFID, with nearly 100% in certain more specialised segments, such as Private Banking and Business Banking. Certification of employees and hours required to renew such certification are actively monitored to ensure that specialist managers have in-depth knowledge to offer quality service to customers.

	2020	2019
No. of employees trained in MiFID	461	2,033

- Product governance. In 2020 the internal procedures related to the launch, marketing and subsequent monitoring of products were updated. Automatic controls are implemented in the entity's various channels and investment services to ensure that the products and services are only distributed to customers with the right profile. Scorecards have been designed to draw up marketing reports.
- Greater information transparency. Operating processes have been further enhanced to ensure that customers receive, read and understand the different information provided before arranging the investment products.
- Accessible portfolio management. Highlights for the year include the reinforcement of the 'Bankia Gestión Experta' service in terms of operations and documentation. This service, which has been widely accepted by customers, makes a service that originally targeted high net-worth individuals available to all customers, especially through the online channel where the minimum contribution required to access the service has been lowered from EUR 10,000 to EUR 1,000.

PREVENTION OF MARKET ABUSE

Bankia has a policy on the prevention of market abuse, approved by the Board of Directors, which sets out the criteria and norms of behaviour to be followed in the financial markets realm as regards insider information and market manipulation, so as to ensure the prevention and control of market abuse.

The guidelines laid down in this policy take into account, inter alia, the obligations provided for in Regulation (EU) No 596/2014 of 16 April on market abuse, together with its implementing regulations, and the Revised Spanish Securities Market Law approved by Royal Legislative Decree 4/2015 of 23 October.

The policy applies to all of the Bankia Group's directors, management and employees, as well as all individuals performing some kind of activity or providing services in the context of financial markets on behalf of the Bankia Group.

The overriding objective of the market abuse legislation is to ensure the integrity of securities markets, enhance investor protection and increase trust in these markets. In this regard, Bankia has continued to work on consolidating a quality model to control market abuse, based on the following lines of action:

- Effective systems and procedures to prevent and detect suspicious transactions. Bankia has a market abuse tool in place which encompasses the different scenarios for detecting the use of insider information and market manipulation. This year, efforts concentrated on ensuring this tool is correctly calibrated and tailored to the entity's types of customers and services.
- Employees are trained in market abuse and have internal procedures and systems available to detect and report suspicious transactions which amount to market abuse.
- Safeguarding, restricting access to and preventing unlawful disclosure of insider information. In 2020, Bankia updated the procedures for managing separate areas, establishing physical and electronic barriers, information protection systems and contingency plans to prevent the flow of information between different areas of activity. Moreover, as soon as insider information becomes known, an insider list is made and appropriate containment and restriction measures are put in place.
- To ensure consent and confidentiality in the communication of insider information to third parties, the entity has procedures which identify groups receiving and disclosing market soundings with forms, logs and the investors contacted.

REGULATORY DEVELOPMENTS IN BANK TRANSPARENCY

Transparency and clarity in its relationships with customers is one of Bankia's objectives and, consequently, one of the main areas worked on by the Regulatory Compliance Directorate.

With the challenge of ensuring an adequate level of protection for customers, Bankia endeavours to safeguard their interests, providing complete, useful and understandable financial information. Transparency with the customer and clarity in the processes of arranging products and services must be the bedrock of achieving an environment of trust and mutual benefit in customer relationships.

Digital marketing and arrangement are of particular importance in the current climate, especially when the relationship is established remotely. In this scenario, the Corporate Regulatory Compliance Directorate has the ongoing aim of ensuring that a lack of direct contact with the customer does not mean a reduction in the quality of information provided or in the access to consultations or possible doubts. Considering the swiftness and immediacy required by new consumer habits, Bankia ensures that the customer protection measures, which are applicable at all times, comply with transparency regulation and are in line with good communication practice.

On this front, in 2020 the Corporate Regulatory Compliance Directorate actively collaborated in the review of the different product marketing processes, striving for transparency in content from the very first action (advertising) to the subsequent delivery of pre-contract information and the monitoring of the contractual relationship with the customer, providing additional information beyond that required by law (information on the website and in online banking, enhanced information for revolving cards, improved information in branches through the digitalisation of notice boards, payment account information, information on products

to alleviate the situation caused by the COVID-19 pandemic, vulnerable groups, code of good mortgage practice, etc.).

Moreover, given the extraordinary situation triggered by the healthcare crisis, this collaboration has extended to the design and launch of specific products for payment holidays and grace periods, to alleviate vulnerable situations caused by the general downturn in economic activity. Worthy of note are Bankia's efforts in customer communication and service, reinforcing the remote service channels during lockdown and providing extensive information on the publicly available website, detailing all relevant aspects of the COVID aid and products available.

The array of actions carried out have made it easier and safer for the entity to adapt to the new situation caused by the COVID-19 pandemic, maintaining the necessary levels of service and customer protection.

AUDIT AND INTERNAL CONTROL

The Corporate Directorate of Internal Audit supervises and assesses the effectiveness of the entity's corporate governance, risk management, internal control and different information systems, as well as verifying compliance with internal and external regulations.

The Corporate Directorate of Internal Audit reports functionally to the Audit And Compliance Committee and hierarchically to the Chief Executive Officer, whose duties are performed independently, both hierarchically and functionally, from the rest of Bankia's directorates.

Internal Audit activity covers the following areas:

- Commercial network audit
- Markets and structural risk audit
- Central services audit
- Processes audit
- Systems audit

Internal Audit reports periodically to the Audit and Compliance Committee and Senior Management on the implementation and results of the Annual Audit Plan, and the audit recommendations and their degree of implementation. This reporting requirement is met through the quarterly presentation of the Audit Monitoring Report and the Recommendations Monitoring Report to the Audit and Compliance Committee and the Management Committee.

Internal Audit's scope of action encompasses all the activities carried out in the Group, with unrestricted access to all the information necessary for its duties. In performing its work, it may contact and gather information from any senior manager or employee of the organisation.

Internal Audit's functions can be summarised in seven processes that sum up its activity: preparation of the Audit Plan; execution of business centre audits; execution of process, centre and system audits; follow-up of audit recommendations; development and maintenance of audit function support applications; internal audit communication and reporting; and collaboration with and coordination of external audits.

The Corporate Directorate of Internal Audit has developed various applications and automated scorecards geared towards optimising its activity and enabling smoother communication between auditors and audited parties. In keeping with the Bank's digital transformation, the Corporate Directorate of Internal Audit has undertaken various initiatives to better gather information for review, increase the volume of verifications, and have more efficient information systems.

The global healthcare crisis triggered by the COVID-19 pandemic has caused a temporary, widespread halt in economic activity which, accentuated by high volatility in financial markets, has led to tensions that give rise to liquidity problems and job losses. In this respect, a raft of urgent and extraordinary legislative measures were adopted to address the economic and social impact of the pandemic. In April 2020, in order to guarantee external constraints, sector-wide agreements and internal arrangements are reflected correctly in Bankia's

policies and procedures, a monitoring and control office (COVID-19 Office), led by the Corporate Directorate of Internal Audit, was created to ensure the fulfilment and implementation of such matters and the correct reporting to supervisors or other bodies. The work carried out by the COVID-19 Office has been reported periodically to the bank's governing bodies.

	2020	2019
No. of audits of processes, products and centres	304	294
No. of branch audits per Audit Plan	728	1,002
No. of fraud prevention alerts	950	980

c) Tax commitment

Promoting responsible tax management is crucial for Bankia in carrying out its financial operations. To achieve this, it encourages the development of tools to prevent and combat fraud, and transparency programmes. These initiatives are instrumented in specific tax risk management and control measures.

Bankia's Board of Directors sets tax strategy, although the Audit and Compliance Committee supervises the tax risk management system. The entity also has internal control systems.

The Board of Directors must approve operations in tax havens (although the bank does not operate in tax havens for tax avoidance purposes) and the creation of tax structures, which under no circumstances may be used to help avoid taxes or breach regulations. This body must also approve divestments from companies, the use of tax incentives and the hiring of external tax advisors.

Bankia's activity is governed by three tax principles: transparency, compliance with obligations, and risk exposure.

Accordingly, Bankia adheres to a transparent policy on tax management and the payment of its taxes, applying the tax regulations applicable in Spain, where it does all its business, in addition to following the guidelines of international institutions, such as the Organisation for Economic Cooperation and Development (OECD).

Regarding the principle of risk exposure, Bankia analyses transactions involving specific tax risk according to, inter alia, their impact on corporate reputation, shareholders and customers, and its relationship with the taxation authorities.

Bankia is a participant in the Large Businesses Forum, aimed at promoting a more cooperative relationship between companies and the Spanish taxation authorities (Agencia Española de la Administración Tributaria, or "AEAT") so that, through mutual trust, general problems that may arise in putting the tax system into effect can be shared. The bank is also a signatory of AEAT's Code of Best Tax Practices (CBTP), which contains recommendations that both parties agree to follow voluntarily.

This collaboration enables Bankia to do business with increased legal certainty, reducing disputes with the Tax Agency and enhancing the Group's reputation, all of which feeds through positively to its financial performance.

In 2019, Bankia, as a CBTP member company, drew up its third Annual Tax Transparency Report, with information for the 2018 financial year. It submitted this report to the AEAT in 2019. Over this last year, it prepared the report with information on 2019, which it will submit in the early months of 2021.

This report contains information on certain aspects of Bankia's economic activity and funding structure, an explanation of the most significant corporate transactions, details of the Group's tax strategy approved by the governing bodies and a list of transactions referred to the Board of Directors. It also establishes the extent to which the bank's tax policy is consistent with the principles of the OECD's Base Erosion Profit Sharing (BEPS) package.

• Country-by-country earnings

Bankia has its organisational structure and conducts all of its businesses in Spain. Therefore, the Group obtains all of its profits in Spain.

	2020	2019
Bankia Group profit (EUR million)	311.5 ¹	755.6

1. Profit before tax and after COVID provisions

- Income tax paid

Bankia paid EUR 162.7 million of income tax in 2020 (including payments on account of 2020 CIT and the financial contribution for 2019).

	2020	2019
Income tax payments (EUR million)	162.7	248.84

1. This includes the financial contribution for 2019 paid in 2020 (EUR 96 million), payments on accounts (EUR 62 million) and withholdings (the rest).

The Bankia Group reported a total amount of taxes paid in the Total Tax Contribution document published in 2019 of EUR 338,684,670 (including the amount of income tax refunded).

The figures reported in this document for taxes correspond to the income obtained by the Bankia Group in 2019, since the figures for 2020 will not be available until sometime in the first few months of 2021, after the accounting closes of all the Group companies.

d) Information security and privacy

DATA PROTECTION

Bankia considers customer information and security to be a crucial asset; protecting this information is one of its top priorities amid continuous technological advances as part of the entity's digitalisation. To this end, in 2020 Bankia has continued to strive to ensure that the principles and rights of customers regarding data protection are applied appropriately within the bank's responsible digitalisation process included in its 2018-2020 Strategic Plan.

Data protection is not only designed to guarantee and protect the fundamental rights of natural persons in relation to their personal data, but also to protect their privacy and prioritise the application of ethical principles in the use of data through new technology, considering that such protection must constitute an added value for customers.

Bankia's internal regulatory framework is defined by the Personal Data Protection Policy approved by the Board of Directors. This policy is based on principles of lawfulness, transparency and minimisation of data, the duty of secrecy and guarantees for the exercise of subjects' rights. It is complemented by other policies such as the Information Security Policy and the Information Retention Policy.

Compliance with the policy is mandatory for all Bankia managers, directors and employees, and especially staff who, because of their function, activity or job, access, process and/or store personal data for which Bankia is responsible.

	2020	2019
No. of employees trained in data protection	1,155	2,033

INFORMATION SECURITY AND CYBER SECURITY

In recent years, technology has become more and more important in business and the day-to-day activity of all sorts of companies, as well as in the management of different types of risk which could have an increasingly large impact on businesses. Moreover, this impact has risen exponentially due to the global pandemic, with a greater risk of cyber attacks because of widespread remote working. Companies from numerous sectors worldwide have suffered such attacks, which cause downtime and have economic and reputational impacts.

Bankia's Cyber Security Committee approved the 2019-2021 Cyber Security Strategic Plan at the end of 2018 and the entity is working on various areas to proactively improve its level of cyber security maturity and protection in order to tackle such risks should they materialise. The cyber security governance model entails action by three committees: the Cyber Security Committee (executive body made up of senior officers who meet every month), the Security Committee and the Global Fraud Management Committee (reporting and consultation bodies). The Cyber Security Committee is presided over by the bank's chief executive office and its duties include the presentation of relevant topics to the Management Committee and the Board. The chief of cyber security often speaks at these committees.

Since the launch of the Strategic Plan and during 2020, the entity has developed various initiatives to this end, including an information protection line of action, incorporating technology that supports the implementation of measures so as to secure data based on the level of importance; and another line of action aimed at ensuring the bank's software development is carried out in a secure manner based on best practice, reducing the risk of attack due to inadequate configuration. Also, the entity has designed and rolled out a new Cyber Risk Management System, which takes into account all cyber security information available from internal and external sources, in order to make decisions and correctly manage risks that might affect Bankia.

A significant investment has been made in improving the Global Anti-Fraud Unit with a view to reducing the risk of fraud in banking transactions, providing customers with a more robust and reliable service, ensuring compliance with the PSD2 directive, incorporating artificial intelligence technology and user behaviour analytics for the early detection of possible threats. PCI DSS requirements have also been amply met following the 2019 audit.

In keeping with the new lines of work, the entity has developed a complete system for measuring indicators and displaying results in scorecards, improving control, accuracy and traceability of the status of security in the bank's systems and processes. Worthy of note within the governance of indicators is the management information on vulnerabilities with built-in control tools and cutting-edge detection technology, information on the new management process with a high degree of automation for cyber risk management, and information on the health of the bank's infrastructure with specific indicators, for in-house systems as well as third-party and cloud-based tools.

Furthermore, in the current climate it is increasingly necessary to outsource services and projects, thus attaining expert knowledge with a smaller investment. To this end, the entity has concentrated on securing and automating the third-party management process, adapting it to the new Cyber Risk Management System to ensure that all trading, agreements and services involving Bankia systems or information include adequate risk management to avoid possible economic and reputational impacts from attacks that could affect the bank or its suppliers.

Specifically, Bankia has applied the lessons learned during the pandemic throughout 2020, making a considerable effort to review and update the business continuity process in the event of an incident, with the entire workforce working remotely without significant incident during the month of March due to the stay-at-home lockdown. This all involved an investment of over EUR 10 million to upgrade the systems in order to ensure the objectives and needs of the different areas of the bank were met, as well as investments in outsourced services, without neglecting cyber security and risks which not only continued to pose a threat to Bankia, but increased substantially. For this purpose, the entity acquired a tool to simulate attacks by malicious users, validating the degree of protection provided by the bank's cyber defence team.

	2020	2019
No. of Cyber Security Committee meetings	8	8
Investment in cyber security risk prevention (EUR million)	8.5	5.78

Amid this ever-changing situation and the increasing importance of technology and systems, employee awareness and training is vital to reduce the impact of a possible attack. Accordingly, a new Training and Awareness Plan was launched in 2019 to develop specific measures for raising awareness of the technology used, as well as aspects to take into account when using company and personal devices and regarding possible threats and the most common forms in which they materialise. A new cyber security course was recently approved and must be completed periodically by all bank employees to ensure they are up to date with the latest trends.

	2020
No. of employees trained in cyber security	12,874

Bankia also fosters a social cyber security culture, sponsoring different startups related to new protection technology, supporting the design and creation of ground-breaking products, and collaborating in various master's courses and conferences that raise awareness and discuss cyber security and GRC in public and private settings.

Lastly, the main challenge going forward is to strengthen the entity's capacity for early detection of potential risks, adapting the bank's defences as a result, thanks to new technology that continuously learns in order to automate and adapt systems to the changing global panorama and possible new situations arising in the future.

e) Risk management

Risk management is a strategic pillar in the entity and its Group. The primary objective of risk management is to safeguard Bankia's financial stability and asset base, while creating value and developing the business in accordance with the risk tolerance and appetite levels set by the governing bodies.

To achieve this, Bankia has an internal control framework organised in accordance with the three lines of defence model, in which the Board of Directors is charged with setting the risk control and management policies and overseeing the effectiveness of internal control, internal audit, regulatory compliance and risk management systems, all without jeopardising its independence.

The internal control framework is in place to guarantee:

- Effective and efficient operations.
- Prudent business management in accordance with the objectives set by the Board of Directors.
- Appropriate identification, measurement and management of risks in accordance with the strategic and business objectives, with an appetite level defined by the Board of Directors.
- Sound accounting procedures and reliability of financial and non-financial information.
- Compliance with applicable laws and internal policies and procedures.

To deliver these objectives, the Bankia Group's Internal Control Framework is guided by the following principles:

- Independent and global risk function, which ensures there is adequate information for decision-making at all levels.
- Objectivity in decision-making, taking account of all relevant (quantitative and qualitative) risk factors.
- Active management throughout the life of the risk, from preliminary analysis until the risk is extinguished.
- Clear processes and procedures, reviewed regularly as needs arise, with clearly defined levels of responsibility.
- Integrated management of all risks through identification and quantification, and consistent management based on a common measure (economic capital).
- Individual treatment of risks, channels and procedures based on the specific characteristics of the risk.

- Development, implementation and diffusion of advanced tools to support decision-making, which facilitate risk management through the effective use of new technologies.
- Decentralisation of decision-making based on the approaches and tools available.
- Inclusion of risk in business decisions at all levels (strategic, tactical and operational).
- Alignment of the risk function's and risk managers' objectives with the objectives of the bank as a whole, so as to maximise value creation.

Bankia has a Risk Appetite Framework and Risk Tolerance approved by the Board of Directors, wherein the risk appetite statement is the key component in the entity's risk management: risk appetite is understood as the amount and type of risk Bankia is willing to assume in its activity in order to meet its objectives, complying with regulatory restrictions and the commitments undertaken.

This framework includes a set of indicators that provide a holistic view of the desired and maximum levels of risk for each risk considered significant for Bankia, along with monitoring mechanisms and responsibilities of the various committees and governing bodies involved.

The Board of Directors reviews the framework annually, updating the desired and maximum levels, and the metrics considered most appropriate for monitoring.

Together, the Risk Appetite Framework and the Capital Planning Framework, also approved by the Board of Directors, set out Bankia's strategic lines of action with respect to risk and capital in normal business conditions. Both processes shape the planning of the entity's activities and businesses.

The Recovery Plan, in contrast, likewise approved by the Board of Directors, specifies the possible measures to be taken in a hypothetical crisis situation. The measures would be triggered if the predefined level of any of the selected indicators in the plan were exceeded. Their definition is consistent with those determined by the tolerance levels in the RAF.

One of the main features of European regulation implementing the capital agreements known as Basel III (BIS III) is the importance of internal governance as a core element of risk management. In this regard, Bankia fits completely with the spirit of this regulation, with its governing bodies assuming responsibility for the oversight and control of risks:

The Board of Directors is the highest governing body. It determines and approves the general internal control strategies and procedures, as well as the policies for assuming, managing, controlling and reducing the risks to which Bankia is exposed. It has several internal committees, which are attributed different risk control and monitoring responsibilities. The Board of Directors is also responsible for monitoring the effectiveness of internal control, internal audit, regulatory compliance and systems for risk management, which it carries out through its different committees.

The Audit and Compliance Committee is responsible for supervising the effectiveness of internal control, internal audit, regulatory compliance and risk management systems, and is able to put forward related recommendations or proposals to the Board of Directors and, where applicable, verify that they are being followed up.

The Risk Advisory Committee advises the Board of Directors on the entity's global current and future propensity to risk, and also proposes to the Board of Directors a policy of controlling and managing the entity and Group's risks, through the capital self-assessment report.

The Delegated Risk Committee is the body responsible for approving risks within the scope of the powers delegated to it, and for overseeing and administering the exercising of delegated powers by lower-level bodies, without prejudice to the supervisory powers legally corresponding to the Audit and Compliance Committee.

Bankia has an organisational model that is consistent with the risk function: in April 2015, the Board of Directors approved the new figure of Chief Risk Officer (CRO) of the bank, setting out the conditions necessary for performing the function, the main responsibilities of the role, and the rules and powers for appointment and removal. The status reinforces the independence of the CRO, which must maintain constant functional

reporting with the Risk Advisory Committee and its chairman. The CRO also has regular, direct two-way access to senior management and the governing bodies.

One of the basic principles of risk management and the assessment of capital adequacy is the implementation of a transparent organisational structure in which functions and responsibilities are clearly assigned, encompassing senior management right down to the lower levels of the entity, with a responsible management team and an active internal control system. As such, Bankia's risk management and control model is based on a three lines of defence model, which is structured around the activities and processes that give rise to the risks and, consequently, determine those responsible.

The first line of defence comprises the risk management directorates, owners of the risk processes and those responsible for carrying out the controls established in the first line of defence, including the areas of risk that directly serve the business.

The second line of defence comprises the Directorates that oversee the risks and define the controls mitigating them, and is composed of the Corporate Risk Directorate and the Corporate Directorate of Regulatory Compliance.

The third line of defence comprises the Corporate Directorate of Internal Audit. Internal Audit is an independent and objective assurance and consultation function, created to add value to and enhance the Group's operations.

RISK MODELS

The Group has a robust governance model for approval of risk models:

- The Models Committee. The main function of this committee is to make proposals to the Board of Directors, through the Risk Advisory Committee, for the approval of new models and expansions/modifications of existing models, as well as proposing the approval of the model implementation plan. It is also able to approve non-significant modifications in accordance with the Risk Models Approval Policy.
- The Risk Advisory Committee has financial and non-financial risk reporting, advisory and proposal-making powers. It submits proposals to the Board of Directors for the approval or significant/non-significant modifications of models, which are subsequently notified to the supervisor two months before implementation in the risk models, including the approval of new models.
- The Board of Directors is responsible for approving new models and expansions/modifications of existing models, taking into consideration applicable rules and protocols when the models have an impact on Pillar I (Risk Models Approval Policy).

The entity has made progress on its Internal Models Plan, which aims to fully review the degree of compliance of internal models with prevailing legislation and future compliance for all Scoring/Rating Models and Risk Parameters (PD / LGD /CCF). This plan covers portfolios defined as low default (large corporations, banks, insurance companies, reinsurance companies and sovereigns) and those considered high default (mortgages, consumer lending, cards, self-employed, micro companies and SMEs). Also, the new Models Governance Framework was approved in 2020.

The main model looked at under the new methodology and governance scheme for models was the Behavioural Model of Mortgages extended to Individuals. This scoring / PD model substantially improves the measurement of risk in the entity's mortgage portfolio as it captures the most up-to-date information possible when scoring the mortgage transactions and allows the entity to roll out the mortgage portfolio of the seven savings banks which integrated to form Bankia following the banking business merger in 2011 and, subsequently, Banco Mare Nostrum.

Supervisor approval, received in September, and the subsequent implementation of the model in the calculation of own funds for credit risk allowed Bankia to reduce risk-weighted assets (RWAs) by EUR 5,969 million, bringing it closer to the RWA density benchmark of the rest of European banks.

CREDIT RISK

The credit risk policies are approved annually by the Board of Directors.

The main objectives of these policies are:

- Responsible risk approval. Customers should be offered the financing facilities that are best tailored to their needs, for amounts and under terms and conditions that match their payment ability. The necessary support should be provided so that borrowers of good faith can overcome their financial difficulties.
- Alignment with the Risk Appetite Framework. Policies must be seen as a set of action guidelines and management criteria aimed at ensuring compliance with the Risk Appetite Statement.
- Establishing criteria that feed through to best banking practices. In this vein, specific policies are defined for industries or borrowers that may be sensitive on account of their social implications, for example investments in or financing of controversial businesses, such as arms and ammunition, or that infringe on human rights, or any activity that could compromise the entity's ethics.
- Transparent environment. A transparent environment is created, integrating the various systems developed to prevent crime and to correct fraud, acting at all times in compliance with applicable law.
- Stable general approval criteria. Although the specific conditions are subject to change, the general guidelines are intended to be permanent.
- Adaptation. The general criteria should be complemented with the development of specific segment and type-of-product criteria so that a well-defined and unambiguous action framework can be established.
- Adapting price to risk. Considering the customer as a whole as well as individual transactions in accordance with the pricing policies in force and guaranteeing the achievement of business objectives and coverage of the cost of risk.
- Data quality. To assess risk appropriately, sufficient and accurate data are required. Therefore, the coherence and integrity of the data must be assured.
- Two-way relationship with internal scoring systems. Policies must establish clear lines of action designed to ensure that the internal scoring systems are fed with accurate and sufficiently complete information to guarantee that they work properly. At the same time, decisions related to credit risk must be shaped by the rating of the borrower and/or the transactions.
- Continuous monitoring of exposures. Monitoring is underpinned by the allocation of specific management responsibilities for customers/transactions, supported by policies, procedures, tools and systems that allow for their appropriate identification and assessment throughout their life cycle.
- Fostering the recovery activity. Based on policies, procedures, tools and systems that ensure flexible and early action by the parties, in the form of initiatives and decision-making aimed at minimising the loss from exposures for the entity.

The foundations for the implementation of credit risk management are as follows:

- The involvement of senior executives in decision-making.
- A holistic view of the credit risk management cycle that enables:
 - a. Planning of the key credit risk metrics to guide the actions of the business and risk-taking.
 - b. Specialisation in each stage of risk management, with policies, procedures and resources in keeping with each one: approval, monitoring and recoveries.

- An approval policy containing criteria that identify, for instance, minimum requirements of transactions and customers, the entity's desired target profile for each type of material risk in line with the Risk Appetite Framework, and the elements or variables to be considered in the analysis and decision-making.
- Preventive system for monitoring customers that involves all business units and forms part of daily management, and which facilitates the entity's recoveries activity in the case of impaired exposures.
- Flexible recoveries model, adaptable to changes in the regulatory environment.
- Tools to assist risk decision-making and measurement, underpinned by credit quality of exposures (scoring, rating), with a view to objectifying and maintaining a risk management policy attuned with the strategy pursued by Bankia at any given time.
- Clear separation of roles and responsibilities. Bankia understands the risk control function as a function that is spread throughout the organisation and is based on a three-lines-of-defence system.

The policies introduce general lending criteria. The most important are:

- Responsible approval: it is important to understand customers' financing needs, taking into account the information and documents provided by customers or obtained from external sources, which must be sufficient. Guarantees must be given to:
 - a) Offer customers the financing that best meets their needs.
 - b) Match the facilities and amounts to their ability to pay without compromising business continuity or family economy.
 - c) Not grant new loans for the purpose of refinancing or restructuring debts to other financial institutions. Subrogations, renewals or renegotiations not due to customers' financial difficulties are not considered in this category.
 - d) Appraise real estate collateral properly and independently in collateralised lending.
- Customers, especially retail customers, must receive the information they need regarding costs in comparison with other products and pre-contractual information and appropriate advice to know and understand the risks associated with the proposed financing.
- Environmental and social risk criteria: based on the information available when making the decision, the entity will take into consideration the environmental impact of the business activity, the existence of environmental objectives, the identification of risks, the measurement of consumption that could affect the environment and sector-specific environmental comparables, valuing the existence of external ratings and environmental management systems and endeavouring to ensure companies comply with applicable environmental laws and regulations.
- New operations or projects linked to companies that have violated human rights or which Bankia knows to have been involved in human rights violations will not be financed.

Bankia's objective is to have a loan portfolio that is as diversified as possible, both in terms of individual borrowers and across sectors, applying an individual and sector diversification policy in granting loans.

Bankia understands risk monitoring as a set of functions, rules, procedures and tools that enable the prevention, anticipation and management cycle to be carried out efficiently in the event of potential deterioration of risks.

The core mission of risk monitoring units and centres is to manage customers by monitoring the risks taken so that measures can be implemented which minimise risk when borrowers' solvency or ability to pay decreases or threatens repayment of the loans. This policy sets out the type of actions required to respond to each type of proactive management performed.

An important aspect of the credit risk policies concerns loan refinancing and restructuring. The objective is to adapt the financing to customers' ability to meet their payment obligations, providing sufficient financial stability to enable the borrower or its group to continue to operate, where viable.

Credit risk is managed in accordance with the limits and guidelines established in the credit risk policies, underpinned by a set of tools.

Risk classification

Rating and scoring tools are used to classify borrowers and/or transactions by risk level. Virtually all segments of the portfolio are classified, mostly based on statistical models. This classification not only aids in decision-making but allows for the addition of the risk appetite and tolerance decided by the governing bodies through the limits established in the policies.

Risk classification also includes the "monitoring levels system". This system aims to manage risks related to business activities proactively by classifying them into four categories:

- i. Level I or high risk: risks to be extinguished in an orderly manner
- ii. Level II or medium-high risk: risks to be reduced
- iii. Level III or medium-low risk: risks to be maintained
- iv. All other exposures deemed performing exposures.

The level is determined in accordance with the rating, as well as other factors, e.g. activity, accounting classification, defaults, the situation of the borrower's group, etc. The level determines the credit risk authorisation powers.

Risk quantification

Credit risk is quantified through two measures: expected loss on the portfolio, which reflects the average amount of losses and is related to the calculation of provisioning requirements, and unexpected losses, which is the possibility of incurring substantially higher-than-expected losses over a period of time, affecting the level of capital considered necessary to meet objectives (economic capital).

The credit risk measurement parameters derived from internal models are exposure at default (EAD), probability of default (PD) based on the rating, and loss given default (LGD) or severity.

Expected loss, obtained as a product of the previous parameters, represents the average amount expected to be lost on the portfolio at a given future date. This is the key metric for measuring the underlying risks of a credit portfolio as it reflects all the features of transactions and not only the borrower's risk profile. Expected loss allows a constrained assessment of a specific real or hypothetical economic scenario or refers to a protracted period of time spanning a full economic cycle. Which concept of expected loss is more appropriate will depend on the specific use.

With the economic capital model, extreme losses can be determined with a certain probability. The difference between expected loss and value at risk is known as unexpected loss. The Entity must have sufficient capital to cover potential losses; therefore, the greater the coverage, the higher the solvency. This model simulates default events and can therefore quantify concentration risk.

Risk projection

Stress test models are another key element of credit risk management, allowing for the risk profiles of portfolios and the sufficiency of capital under stressed scenarios to be evaluated. The tests are aimed at assessing the systemic component of risk, while also bearing in mind specific vulnerabilities of the portfolios. The impact of stressed macroeconomic scenarios on risk parameters and migration matrices is assessed, allowing expected loss under stress scenarios and the impact on profit or loss to be determined.

Risk-adjusted return

The return on a transaction must be adjusted for the cost of the various risks it entails, not only the credit risk. It must also be compared with the volume of capital that has to be set aside to cover unexpected losses (economic capital) and meet regulatory capital requirements (regulatory capital).

RAR (risk-adjusted return) is a core risk management tool. In wholesale banking, pricing powers depend on both the RAR of the new transactions proposed and the RAR of the relationship, considering all the outstanding business with a customer. In retail banking, RAR is considered to determine approval criteria (cut-off points) in accordance with the fees in effect at any given time. The Board, through the Risk Advisory Committee, is informed regularly on the RARs of all the lending portfolios, distinguishing between the total portfolio and new loans.

Business revitalisation

One of Risk Management's functions is to create value and develop the business in accordance with the risk appetite established by the governing bodies. In this respect, the Risk Directorate is equally responsible for revitalising the lending business, providing tools and establishing criteria that identify potential customers, simplify the decision-making processes and allocate risk lines, always within pre-defined tolerance levels. It has tools and pre-authorisation and limit assignment processes for lending to both companies and retail customers.

Recovery management

Recovery management is defined as a comprehensive process that begins even before a payment is missed, covering all phases of the recovery cycle until a solution is reached, whether amicable or contentious.

Early warning models are applied in lending to retail customers. They are designed to identify potential problems and offer solutions, which may entail adapting the conditions of the financing. In fact, a large number of mortgage loan renegotiations during the year resulted from the proposals put forward proactively by the entity.

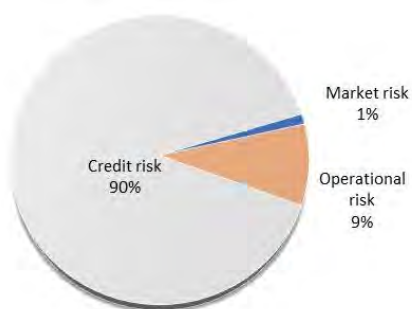
With business loans, the system of levels described above has the same objective: proactive management of non-performing loans. Therefore, the entire portfolio is monitored in such a way that default only arises from an unsuccessful prior negotiation.

Concentration risk management

The entity uses a set of tools to analyse and monitor the concentration of risks. First, as part of the calculation of economic capital, it identifies the component of specific economic capital as the difference between systemic economic capital, assuming maximum diversification, and total economic capital, which includes the effect of concentration. This component provides a direct measure of concentration risk. An approach similar to that used by ratings agencies is applied, paying attention to the weight of the main risks with respect to the volume of capital and income-generation ability.

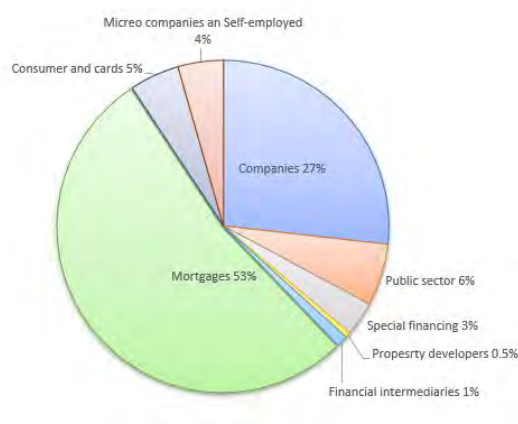
Credit risk profile

Based on the distribution of risk-weighted assets (RWAs), Bankia's risk profile shows a predominance of credit risk with the following distribution:

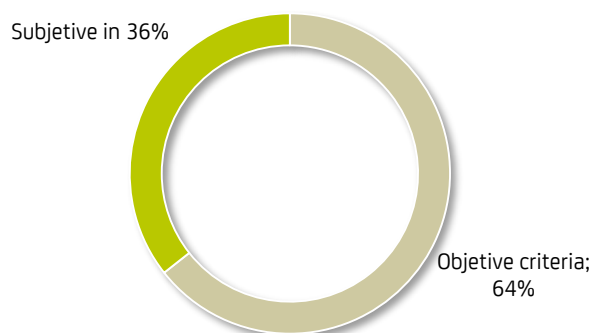


Key characteristics of the credit risk profile and trends in 2020:

- The mortgage portfolio accounts for 53% of total loans and receivables. The business loan portfolio is the second largest, making up 27% of the total.
- The breakdown of loans and advances to customers is 38% wholesale segment, and 62% retail, similar to 2019.
- The portfolio of real estate development assets represents 0.5% of loans and receivables.



- The Bankia Group ended 2020 showing a decline in non-performing assets of 4% (EUR 252 million), resulting in a reduction in the NPL ratio to 4.70%.
- The distribution of non-performing loans is 64% due to objective criteria while the remaining 36% is due to subjective criteria or loans that are in the cure period. Accordingly, there are no loans in this portfolio that are past-due and imply objective arrears.



- Regarding the quantification of credit risk at the 2020 year end, the distribution by portfolios using exposure at default (EAD), expected loss and regulatory capital would be as follows.

Segment (in millions de EUR)	Dec-20	
	Regulatory Capital	Expected Loss
Bodies	49.4	85.3
Banks and intermediaries	204.9	8.7
Companies	1,678.5	1,068.9
Property developers	90.5	71.9
Retail:	1,678.7	1,897.6
<i>Mortgages</i>	1,125.5	1,321.1
<i>Consumer</i>	241.2	221.9
<i>Cards</i>	116.6	61.9
<i>Micro companies and self- employed</i>	195.5	292.7
Equities	58.5	4.2
TOTAL	3,760.6	3,136.5

MARKET RISK

Market risk arises from adverse movements in the value of financial assets in the entity's held for trading portfolio. Specifically, the risk is due to variability in the underlying market value, the liquidity of the assets or the effectiveness of the measurement models used.

A general framework is in place for integrated, prudent and consistent management of market risk to preserve solvency and prevent earnings from being heavily affected by the complexity and scale of the risks taken.

Market risk is measured using mainly two metrics:

- VaR: the maximum loss that can be incurred in a given period with a given confidence level. SVaR (stressed VaR) is the VaR calculated in an extreme market situation.
- Sensitivity: measures the change arising in the economic value of a portfolio in response to predetermined, fixed movements in underlying market factors affecting the value (interest rates, exchange rates, equities, spreads, credit spreads, commodity prices and their respective volatility).

Periodically, stress testing is performed to quantify the economic impact of extreme movements in market factors on the portfolio.

In 2020 Bankia carried out numerous initiatives to improve various areas (policies, guidelines, processes, controls, reconciliations, analysis, reporting templates, etc.):

- Automation of control processes and report generation.
- Improvements in controls over the held for trading portfolio scope.
- Expansion of internal control back-testing and improvements in the analysis method.
- Improvements in processes for market risk data quality.
- Incorporation into automated processes of self-assessment criteria for market risk models and reporting templates.
- Improvements in controls over risk factors and reporting templates.

- Development and implementation of the operating process for identifying, measuring and managing risks that are not included in the authorised models for the calculation of capital requirements for market risk.
- Improvements in the estimation method of the incremental risk model.
- Improvements in additional valuation adjustments (AVAs) in reporting processes.
- Development and roll-out of new products.
- Improvements in the execution and reporting templates of the stress testing program.
- Responses to requests and participation of the entity in different exercises stemming from the European Banking Authority (EBA) and the European Central Bank.

COUNTERPARTY RISK IN FINANCIAL MARKETS

Counterparty risk is the risk that a counterparty will fail to meet its contractual obligations, giving rise to a loss for the bank in its financial market activity.

The risk policy control and management stems from several of the bank's decision-making bodies, the Board of Directors being responsible for approving the Manual of Credit Risk Policies in Market Activities. All financial market activity is covered by this manual, which includes policies for financial and non-financial institutions, and treasury departments, setting overall limits that function as action frameworks.

The manual mainly covers the following:

- Definition of counterparty risk and types of authorised products, including credit and fixed-income transactions.
- Definition of authorised holders and criteria for allocating limits for financial and non-financial institutions.
- Metrics used to calculate counterparty risk.
- Measures to mitigate counterparty risk. The bank mainly uses the following mitigation tools:
 - Break clauses in derivative products.
 - Netting of debit and credit positions with the same counterparty.
 - Posting of collateral at the net market value of the positions.
 - Replacement of derivative multiples between two counterparties with a smaller number and a smaller notional amount, lowering the credit exposure (compression).

During the year the entity completed development of the Murex module in order to comply with the new EMIR regulation – initial margin, the adaptation of the stress CEM calculation to new EBA scenarios, the creation of new counterparties, the signing of agreements and limits as a result of Brexit, the RDA project on the automation of reports for repos and securities lending, and the update of the SA-CCR module.

STRUCTURAL INTEREST RATE RISK

This is defined as the risk of loss resulting from adverse movements in market interest rates. Interest rate fluctuations affect both net interest income and equity. The intensity of the impact depends, to a large extent, on the different structure of maturities and repricing of assets, liabilities and off-balance-sheet transactions.

As with other risks, management of structural interest rate risk is based on a clear system of separation of roles and responsibilities.

Interest rate risk is monitored and managed in accordance with the criteria approved by the governing bodies. The risk measures relating to regulatory scenarios are incorporated into the entity's Risk Appetite Framework. The limits are adapted to the tolerance and appetite levels set by the Board of Directors. Each month, for purposes of follow-up and monitoring, information on structural balance sheet risk is reported to the ALCO in terms of both economic value (sensitivities to different scenarios and VaR) and net interest income (financial margin projections in different interest rate scenarios for horizons of one and three years). At least quarterly, the Board of Directors is informed through the Risk Advisory Committee on the situation and monitoring of limits and is notified immediately if the high-level limits are breached.

The entity prepares various sensitivity scenarios in line with regulations including both parallel (currently ± 200 bps) and non-parallel shifts and shifts affecting the slope of the curve, in line with EBA guidelines.

In 2020 further improvements have been made to the global model for interest rate risk in the banking book (IRRBB), in keeping with EBA guidelines. Key actions included:

- Further improvements to the model's architecture and greater process efficiency related to the calculation engine.
- Validation and final roll-out of the metrics-based risk model.
- Recalibration of all the entity's behavioural models, the NMD (non-maturity deposits) model for current accounts, FTDs (fixed-term deposits), loan prepayment and revolving credit.
- Monitoring and follow-up of credit spread risk in the banking book (CSRBB) applying the European Banking Federation's approach.
- Incorporation of dynamic scenarios within the internal capital adequacy assessment process (ICAAP), with greater detail and analysis of risks.

LIQUIDITY AND FUNDING RISK

Bankia strives to maintain a long-term financing structure that mirrors the liquidity of its assets, with maturity profiles that are compatible with the generation of stable, recurring cash flows to enable the bank to manage its balance sheet free of short-term liquidity pressures.

For this purpose, the Group's liquidity position is identified, controlled and monitored on a daily basis. According to the retail business model underpinning Bankia's banking activity, the main funding source is customer deposits. The bank taps domestic and international capital markets, in particular repo markets, to raise financing so that it meets its additional liquidity needs.

At the same time, and as a prudent measure to prepare for potential stress or crises, Bankia has deposited certain assets in the European Central Bank (ECB) that it can use to raise liquidity immediately. Ongoing monitoring of assets enables the bank to identify those assets that are readily usable as liquidity reserves at times of market stress, differentiating between assets that are considered eligible by the ECB, or by clearing houses or other financial counterparties (e.g. insurance companies, investment funds).

Regarding the structure of roles and responsibilities, the Assets and Liabilities Committee (ALCO) is charged with monitoring and managing liquidity risk based on recommendations, mainly by the Corporate Directorate of Finance and within the Liquidity Risk Appetite and Funding Framework approved by the Board of Directors. The ALCO proposes rules for raising funding, for each instrument and maturity, to ensure the availability at all times of funds at reasonable prices to meet obligations and finance the growth of its lending activity.

The Financial Risk Control Directorate operates as an independent unit, monitoring and analysing liquidity risk, among other responsibilities. It also promotes the integration of these activities in management by developing metrics and methodologies to ensure that risk remains within defined risk appetite tolerance levels.

Specific targets are set for these metrics in managing liquidity risk in both business-as-usual and stress situations, with the primary objective of achieving adequate self-financing of on-balance sheet credit activity. Secondly, there are efforts to promote appropriate diversification in the wholesale funding structure, limiting the use of capital markets in the short term, as well as in the funding mix, maturity terms and concentration of assets in the liquidity buffer.

Alongside the monitoring of liquidity risk in normal market conditions, action guidelines have been designed to prevent and manage situations of liquidity stress. The cornerstone of these is the Liquidity Contingency Plan (LCP) which sets out the committees in charge of monitoring and implementing the LCP and the protocol for determining responsibilities, internal and external communication flows, and potential action plans to redirect the risk profile to within the entity's tolerance limits. The LCP is backed by specific metrics, in the form of LCP monitoring alerts, and by complementary metrics to liquidity risk and regulatory funding indicators.

Bankia continued to work on strengthening its liquidity and funding risk management framework in 2020. For that purpose, through the internal liquidity adequacy assessment process (ILAAP) it assessed a series of qualitative aspects to verify the extent to which the management framework built around liquidity and funding risk complied with the supervisor's regulatory principles and guidelines in accordance with the bank's size and complexity. These assessments uncovered weaknesses and areas for improvement, paving the way for further enhancements in the quality of the risk management framework. The following actions were taken to address the weaknesses:

- Further developments to increase issuance capacity via securitisation.
- Improvements to the automation of templates for the SSM Liquidity Exercise.
- Efforts to enhance ALMM reporting.
- Issue of public-sector covered bonds to improve Bankia's financing capacity, having undertaken the necessary development in 2019 to meet the ECB's registration and harmonised information requirements.
- Consideration of reverse stress tests performed for ILAAP purposes in the Recovery Plan.
- Full integration of the Liquidity Stress Test 2019 (LIST-2019) approach in the monitoring of liquidity metrics under stress events.

OPERATIONAL RISK

Operational risk is the risk of loss arising from failures or shortcomings in processes, personnel or internal systems, or from external events. This definition includes legal risk, but excludes reputational risk.

To manage operational risk, Bankia promotes an operational risk management culture, with a particular emphasis on awareness-raising, accountability and commitment, and service quality. It also aims to ensure that operational risk is identified and measured reliably, to implement systems for continuous improvement in processes, the control structure and mitigation plans, and to promote new risk transfer mechanisms that limit exposure, while also ensuring that contingency and business continuity plans are in place.

The risk self-assessment was carried out in 2020, reviewing the entity's level of exposure and the applicability of the controls over the most important risks.

Additionally, further work was done on the plan, introducing new roles and responsibilities for the Non-Financial Risk Control Department in line with the three lines of defence model implemented. The operational risk and internal risk control functions were unified under a single Non-Financial Risk Control Directorate in a bid to leverage synergies, approaches and common tools so as to strengthen the entity's control framework and expand the role as a second line of defence in the areas of technology, cyber security and third-party risk. Likewise, the IT risk control metric continued to be reported in the Risk Appetite Framework, complementing the information already reported on cyber risk.

In 2020 Bankia developed and rolled out a new model for control of operational risk in relation to loss events, and expanded the model for internal control over risks in self-assessment exercises, metrics and action plans, attuned with the entity's existing system of internal control over risks.

As for outsourcing by the entity, after the new Policy on outsourcing services and functions was approved to adapt to EBA/GL/2019/02 "EBA Guidelines on outsourcing arrangements", which, alongside the General Outsourcing Model and the Outsourcing Handbook, fleshes out the roles and responsibilities of managing and controlling outsourcing service arrangements, a new tool for managing third-party risks has been developed and rolled out. This is used to assess risks in controls performed by functional management over the service rendered by the supplier, as well as those associated with the actual provision of the service and the potential reputational risk arising from the outsourcing.

MANAGEMENT OF RISK RELATED TO THE COVID-19 PANDEMIC

Bankia has a robust and integrated governance system that allows it to identify, manage and control material risks, and ensure minimum levels of capital are maintained in order to achieve the strategic and business objectives set by the governing bodies. The risk management, governance, processes and systems have been changed as a result of the pandemic, constantly adapting them to duly address the situation. This has made it possible for the entity to meet the needs and requirements of credit risk identification and measurement in the context of the COVID-19 pandemic.

The bank's current policy framework, which is approved by the Board of Directors, incorporated an additional document on the Powers, Policies, Specific Credit Risk Criteria and Control Framework for COVID, which was required given the need to adapt the normal policies and specific criteria of credit risk policies to provide special powers for all the solutions made available to customers following the onset of the pandemic.

Bankia also complies with supervisors' expectations for the measurement and classification of credit risk in all aspects identified, aligned with the pronouncements made by the various regulators, indicating the measures adopted by the entity with a sufficient level of quantitative and qualitative detail.

Within the socioeconomic environment generated by the pandemic, the management framework has evolved towards an early detection of risks and strict identification and monitoring of all positions and customers affected, with extraordinary COVID-19 measures (payment holidays, grace periods and public ICO guarantees).

Following prudential criteria, the entity has made extraordinary provisions amounting to EUR 490 million, improving the coverage of the loan portfolio as a result of the COVID-19 fallout. The aims are as follows:

- Pre-empt "COVID" portfolio allowances and provisions (Cliff Effect).
- Recalibrate models and other related actions.
- Make additional provisions to cover the volatility of the macroeconomic scenarios contemplated in the recalibration of the models for calculating collective provisions.

The COVID portfolio was reclassified using the following segmentation:

- Housing (payment holidays and grace periods): 95.5% of the COVID Housing portfolio is up to date with payments.
- Consumer (payment holidays and grace periods): 93.6% of the COVID Consumer portfolio is up to date with payments.
- Businesses (ICO guarantees): 98.7% of the COVID Businesses portfolio is up to date with payments.

In this connection, as a general rule, the granting of public and private moratoriums that comply with the EBA/GL/2020/02 Guidelines does not entail the identification of the transactions as refinanced or restructured, unless the transaction was already identified as refinanced or restructured on the date on which the moratorium was granted. Once the moratorium has been granted, the entity applies the same criteria contained in the monitoring policies to identify situations where the borrower is showing signs of financial difficulties.

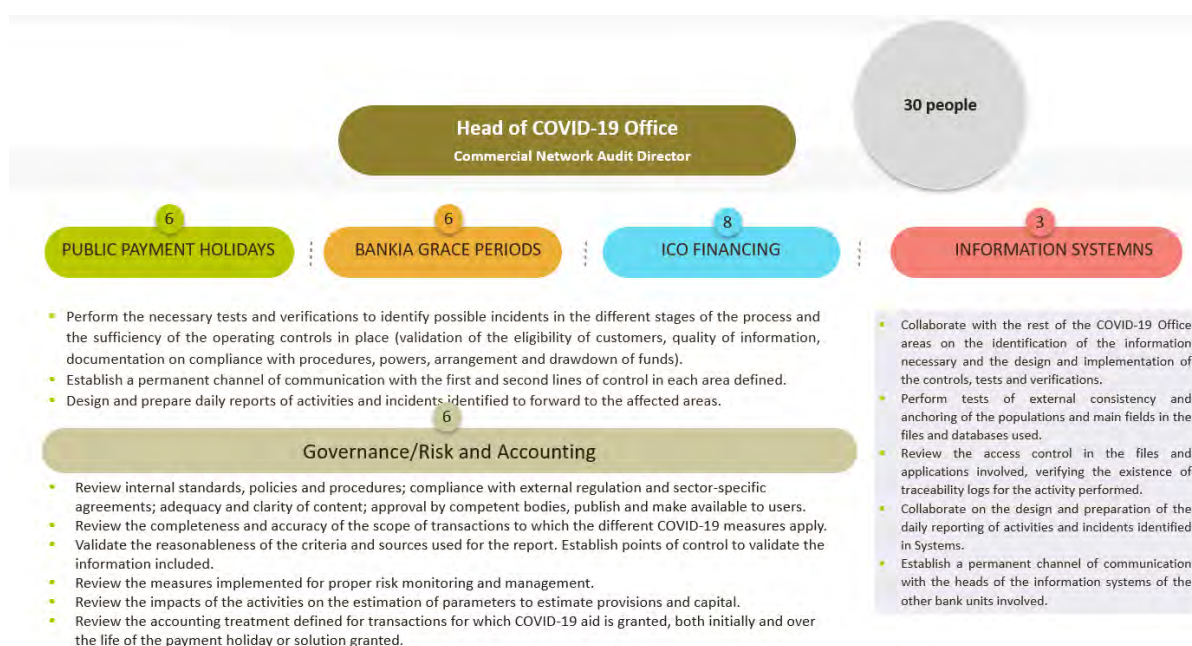
Moreover, Bankia has rolled out a raft of initiatives to adapt to the new regulation and the new measures implemented during the process, and to duly manage and govern the response to the COVID-19 pandemic. These initiatives include:

- Redesigning and improving Bankia's processes for refinancing and flagging transactions prior to the start of the pandemic.
- Adapting systems for COVID transactions in housing, consumer and business loans:
 - o Information and reporting system with flags at transaction level (for the rescheduling of existing financing) and product level (newly created COVID products).
 - o Risk applications to accommodate COVID impacts: calculation of cost of risk and powers.
- Customer segmentation by turnover, between companies with revenues of over EUR 1 million and those under EUR 1 million, individuals and self-employed workers, to develop preventative measures (review of risk appetite of customers and identification of sectors hit hardest by COVID) and implement early warning systems, using advanced predictive models to identify customers susceptible to impairment. For individuals and self-employed workers, the early warning systems have been adapted to capture future arrears when the customers are still in a grace period.
- Design of 30 COVID portfolio KPIs: 9 in housing, 11 in consumer and 10 in businesses for monthly monitoring of the COVID portfolio.
- The entity has calibrated the quantitative criteria for the determination of significant increase in credit risk.
- Credit risk estimates specifically differentiate the forecast behaviour of the COVID portfolio from the rest of the portfolio.

All of this work was carried out in coordination between the three lines of defence:

- First line of defence: approval of grace periods and public guarantee systems for companies (ICO guarantees), adapting the framework for policies and powers.
- Second line of defence: recalibration of IFRS 9 parameters adjusted to the macroeconomic environment, COVID-19 impairment report, and internal control framework which includes specific monitoring of COVID portfolio indicators.
- Third line of defence: creation of the COVID-19 Office with over 30 professionals assigned since April 2020. Its purpose is to continually review the approval, classification and accounting of the COVID portfolio.

Bankia's Management Committee set up the COVID-19 Office in April 2020, charging the Corporate Directorate of Internal Audit with its creation and management.



This structure has been adopted based on the type of products being rolled out in Bankia, taking into account the specific solutions implemented for registration, approval, signing and monitoring (processes, applications, controls and managers of the operations). The entity has assigned the persons with the skills and experience most suited to each area of review.

An initial 30 people were assigned to the office, but in view of the needs derived from the creation of new products, establishing controls, verifications analysis and new operations detected (SoYou and Pension Manager), the structure has been bolstered with additional personnel attached to the Corporate Directorate of Internal Audit.

A total of 6,909 case files had been reviewed as of 31 December 2020.

- Volume of transactions of businesses with ICO guarantees and outstanding mortgage transactions with payment holidays.

The volume of transactions of businesses with ICO guarantees in force at the November 2020 close (the information available at the date this report was prepared) amounted to EUR 10,484 million, while the volume of outstanding mortgage transactions with payment holidays at the same date was EUR 4,594 million:

	Amount (EUR million)
Housing - Payment holiday	4,594
Businesses - ICO-backed financing granted:	
• Financing granted	10,484
• Balance drawn down	7,896 ¹

1. Companies which have received ICO-backed loans have also received additional unsecured financing of EUR 8,048 million, amounting to total loans and receivables of EUR 15,944 million.

REPUTATIONAL RISK

In 2020 Bankia continued to devote major efforts to managing reputational risk, in line with regulatory and supervisory requirements. This type of risk is included in the entity's risk model, using an approach for quantifying reputational risks through a monitoring indicator within the Risk Appetite Framework.

The number of departments involved increased further during the year, practically covering the entity's entire organisation and providing a more comprehensive and accurate view that facilitates decision-making.

These measures completed a project that in 2017 resulted in the design of a synthetic indicator to monitor changes in Bankia's reputation that determines the main (internal or sector) risk events and analyses the quality of the control environment in place in Bankia to prevent or mitigate them. With this indicator, the Board of Directors knows the level of Bankia's reputation and the related risk map, enabling it to identify actual or potential problems and lay down basic principles and guidelines in this respect.

EMERGING RISKS

In the supervisory review and evaluation process (SREP), it is acknowledged that a good internal capital adequacy assessment process (ICAAP) reduces an institution's and its supervisor's uncertainty concerning the risks that the institution is or may be exposed to, and gives supervisors an increased level of confidence in the institution's ability to continue operating by maintaining adequate capitalisation and by managing its risks effectively. This requires the institution, in a forward-looking manner, to ensure that all material risks are identified, effectively managed (using an appropriate combination of quantification and controls) and covered by a sufficient amount of high quality capital.

On this premise, Bankia has a dynamic and continuous risk identification and measurement procedure involving all areas related to potential risks, within their remit, with the objective of measuring risks that the bank incurs, or may incur, in carrying out its operations.

This process is updated at least annually from both a regulatory and economic perspective to measure risks already identified and emerging risks. The Board of Directors, as the senior body, decides which risks are considered material and which it will cover with capital, incorporating them into Bankia's risk map.

POLICY ON THE FINANCING OF CONTROVERSIAL SECTORS AND SUSTAINABLE FINANCING

Bankia's Loan Approval Policy, approved by the Board of Directors, contains a series of principles that set out the guidelines defined by the bank for financing operations, considering environmental criteria and controversial sectors.

The policy specifically defines sustainable financing as that which:

- Contributes to an environmental goal, measured, for example, through key resource efficiency indicators related to the use of energy, renewable energy, the consumption of raw materials, water and land, production of waste and greenhouse gases, and the impact on biodiversity and the circular economy.
- Contributes to a social goal, particularly any investment that helps fight inequality, strengthens social cohesion, social integration and labour relations, and all investments in human capital or financially/socially disadvantaged communities.
- Relates to investments that do not significantly undermine any of the other goals mentioned (precautionary principle), in companies that follow good governance practices, particularly as regards their management structures, relationships with payroll staff and employee remuneration, which are healthy and comply with tax obligations.

As regards environmental factors within the business activity, as general criteria in credit risk transactions, based on the information available when making the decision, the entity will take into consideration the environmental impact of the business activity, the existence of environmental objectives, the identification of risks, the measurement of consumption that could affect the environment, etc., endeavouring to ensure companies comply with applicable environmental laws and regulations.

Compliance with the Equator Principles is of particular importance in project finance. Bankia has been a signatory of these since 2019 for projects in which the entity provides financing and/or advice.

As regards controversial sectors:

- The entity will not finance transactions or projects whose counterparty or objective is a company that manufactures, distributes, sells or promotes the use of controversial arms, or companies in the arms and munitions industry from or domiciled in a country which maintains armed conflicts or is on the list of countries subject to arms embargos by the United Nations Security Council and/or the EU, non-proliferation agreements, or any other international sanctions.
- New operations or projects linked to companies that have violated human rights or which Bankia knows to have been involved in human rights violations will not be financed.
- New transactions or projects linked to borrowers which Bankia knows to have been involved in money laundering activities, terrorist financing and/or tax evasion, fraud or corruption will not be financed.

As part of the entity's commitment to sustainability and continuous improvement, throughout 2020 it has incorporated procedures to assess environmental, social and good governance (ESG) aspects in lending processes, which aim to provide adequate information on customers regarding sustainability to improve decision-making.

Therefore, the processes implemented provide the business and risks areas with more in-depth information on borrowers' commitment to sustainability, their regard for environmental risks and ESG factors. The purpose of integrating such criteria is to expand the range of analysed items taken into consideration, which will help the entity to avoid financing controversial sectors, providing the parties involved in decision-making with all available information when making the decision.

In 2020 the entity launched a pilot process aimed at rolling out the analysis in customers of a certain size or with a certain exposure, gradually increasing the roll-out throughout the second half of the year.

4. RESPONSIBLE BANKING

a) Corporate governance

Bankia's governing bodies are the General Meeting of Shareholders and the Board of Directors.

- The General Meeting of Shareholders is the highest decision-making authority within the scope attributed to it by law or the bylaws; e.g. the appointment and removal of Directors, the approval of the annual financial statements, the distribution of dividends or the acquisition or disposal of core assets, and the approval of the director remuneration policy, among others.

The Board of Directors is responsible for representation of the Bank and has the broadest authority to administer the Bank, except for matters reserved for the General Meeting of Shareholders. Its responsibilities include approving the strategic or business plan, management objectives and annual budgets, and determining the Company's general policies and strategies, the corporate governance policy for the Company and the Group, the responsible management policy, and supervising the functioning of any committees it may have set up and the actions of the delegate bodies.

BOARD OF DIRECTORS

Bankia's Board of Directors comprises 13 directors: three executive directors, nine independent directors and one other external director.

NAME	POSITION	CATEGORY	^{1st} APPOINTMENT	<u>MOST</u> <u>RECENT</u> <u>REELECTION</u>
Mr. José I. Goirigolzarri Tellaeché	Chairman	Executive	9/05/12	24/03/17
Mr. José Sevilla Álvarez	CEO	Executive	25/05/12	27/03/20
Mr. Joaquín Ayuso García	Director	Independent	25/05/12	27/03/20
Mr. Francisco Javier Campo García	Director	Independent	25/05/12	27/03/20
Ms. Eva Castillo Sanz	Ind. Coord. Dir.	Independent	25/05/12	27/03/20
Mr. Jorge Cosmen Menéndez-Castañedo	Director	Independent	25/05/12	24/03/17
Mr. Carlos Egea Krauel	Director	Other external	14/09/17	
Mr. José Luis Feito Higuera	Director	Independent	25/05/12	24/03/17
Mr. Fernando Fdez. Méndez de Andés	Director	Independent	25/05/12	24/03/17
Ms. Laura González Molero	Director	Independent	25/10/18	22/03/19
Mr. Antonio Greño Hidalgo	Director	Independent	15/03/16	27/03/20
Ms. Nuria Oliver Ramírez	Director	Independent	27/03/20	
Mr. Antonio Ortega Parra	Director	Executive	25/06/14	24/03/17

The Board of Directors met 21 times in 2020.

	2020	2019
% attendance by directors at board meetings	98.86%	98.33%
Average tenure of independent directors	4.7 years	5.7 years old
Percentage of women directors	23.08%	16.67%

Bankia has six Board Committees, whose members are appointed based on their suitability, knowledge, aptitude, experience and the duties of each Committee.

Audit and Compliance Committee

The Audit and Compliance Committee is composed of five directors, of which four are independent and one is an external director. This committee met 20 times in 2020.

Its responsibilities include monitoring the effectiveness of internal control, internal audit, financial and non-financial risk management systems, as well as the statutory financial and non-financial reporting process; making proposals to the Board of Directors on the selection, appointment, re-election and replacement of the statutory auditors, and conducting relations with the auditors; and examining and supervising compliance with Bankia's governance and compliance rules.

Appointments and Responsible Management Committee

The Appointments and Responsible Management Committee is composed of four directors, all independent. This committee met 13 times in 2020.

Its powers include proposing and reporting on the appointment and removal of directors and senior executives; assessing the competencies, knowledge, ability, diversity and experience required on the Board of Directors; defining the functions and aptitudes required of candidates to fill vacancies; assessing the time and commitment required for directors to be able to perform their duties effectively; and examining and organising the succession plan for the chairman, CEO and senior executives of the Bank. It also reviews the Sustainable Management Policy and sees that environmental and social practices fall in line with the strategy and policies set.

Remuneration Committee

The Remuneration Committee is composed of four directors, all independent. This committee held 10 meetings in 2020.

It has general authority to propose and report on directors' and senior executives' remuneration and other terms of their contracts; reviews remuneration programmes, assessing their appropriateness and performance; ensures transparency in remuneration; and monitors adherence to the Bank's remuneration policy, among other responsibilities.

Risk Advisory Committee

The Advisory Committee is made up of four directors, all independent. This committee met 19 times in 2020.

Its duties include advising the Board of Directors on the Bank's overall risk propensity and risk strategy; overseeing the asset and liability pricing policy; presenting risk policies to the Board of Directors; proposing Bankia's and the Bankia Group's risk control and risk management policy to the Board of Directors through the Internal Capital Adequacy Assessment Process report; supervising the internal risk control and risk management function; and proposing the credit risk authority framework to the Board of Directors.

Board Risk Committee

The Board Risk Committee is composed of three directors, of which two are independent and one is an executive director. This committee met 27 times in 2020.

The Board Risk Committee is an executive body with responsibility for approving risk-related decisions within the scope of powers delegated to it by the Board of Directors. Its remit includes guiding and administering the exercise of delegated authority by lower-ranking bodies; approving important transactions; and defining overall exposure limits. It also reports to the Board of Directors on any risks that may affect solvency, recurring results, operations or reputation.

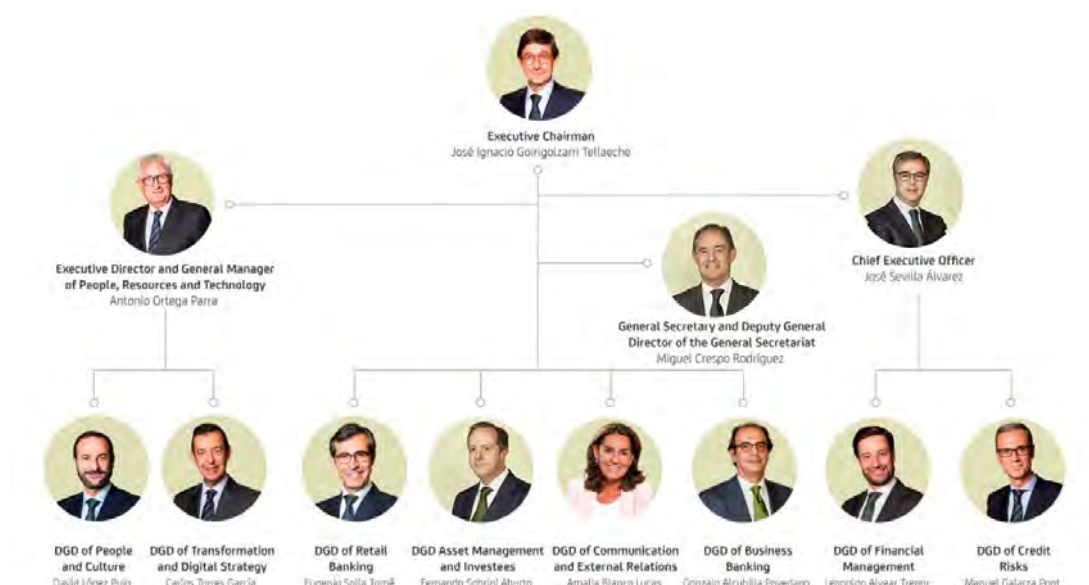
Technology and Innovation Committee

The Technology and Innovation Committee is composed of five directors, of which three are independent and two are executive directors. This committee met 2 times in 2020.

Prior to their submission for the approval of the Board of Directors, it seeks to understand and report on the technology, innovation, cyber security and data analysis policies and/or strategies, supervising and monitoring any specific plans and projects of particular relevance in this regard, debating such matters and proposing initiatives for the consideration of the Board.

MANAGEMENT COMMITTEE

Bankia also has a Management Committee, which is the Bank's highest management body and is made up of the Chairman of the Board of Directors, Mr. José Ignacio Goirigolzarri; the Chief Executive Officer, Mr. José Sevilla; the Executive Director and General Manager of People, Resources and Technology, Mr. Antonio Ortega; the Deputy General Director of Business Banking, Mr. Gonzalo Alcubilla; the Deputy General Director of Financial Management, Mr. Leopoldo Alvear; the Deputy General Director of Communication and External Relations, Ms. Amalia Blanco; Deputy General Director of the General Secretariat, Mr. Miguel Crespo; the Deputy General Director of Credit Risks, Mr. Manuel Galarza; the Deputy General Director of People and Culture, Mr. David López; the Deputy General Director of Asset Management and Investees, Mr. Fernando Sobrini; the Deputy General Director of Retail Banking, Mr. Eugenio Solla; and the Deputy General Director of Transformation and Digital Strategy, Mr. Carlos Torres.



CORPORATE GOVERNANCE SYSTEM

Bankia has a Corporate Governance System approved by the Board of Directors that takes inspiration from the Bankia Group's corporate values in terms of business ethics and sustainability: we are honest, proximate, professional, passionate, courageous and we make it possible.

This system is in turn underpinned by the principles of good governance, assumed and set out by the Bank in the Corporate Governance Policy, and the definition of the Bankia Group's structure, approved by the Bank's Board of Directors based on the recommendations of the Good Governance Code for Listed Companies approved by the board of the Spanish National Securities Market Commission and in the Internal Governance Policy also approved by the Board of Directors, which includes, inter alia, the recommendations of the Internal Governance Guidelines of the European Banking Authority.

Comprising a raft of internal rules and procedures complying with current legislation and the corporate autonomy enshrined therein, Bankia's system of corporate governance ultimately aims to satisfy the corporate interest, understood as the common interest of all shareholders of an independent, public limited company (sociedad anónima) focused on the profitable and sustainable pursuit of its objects and the creation of long-term value and with a broad base of institutional and retail shareholders.

In this regard, the system seeks as a priority to not only to establish an appropriate distribution of functions in the organisation of the Bank and its Group and the prevention and resolution of possible conflicts of interest, but also to establish a transparency-based framework of relations between Bankia and its shareholders, which adequately protects the rights of shareholders with full respect for the principle of parity of treatment.

Bankia's corporate governance system is essentially made up of:

- Corporate documents: Corporate Bylaws, General Meeting Regulations, Board of Directors Regulations, and the Regulations of the Audit and Compliance Committee, the Regulations of the Appointments and Responsible Management Committee, and the Regulations of the Remuneration Committee, approved by the Board of Directors.
- Internal rules of conduct and procedures: The Code of Ethics and Conduct; the Internal Rules of Conduct in the Securities Market, and other provisions and internal procedures in the areas of anti-money laundering and counter terrorist financing, the Customer Protection Rules of Bankia and its Group, and the Whistleblowing Channel Regulations. This falls within the framework of Bankia's commitment to promote an ethical corporate culture that complies with and encourages responsible behaviour.
- Corporate Policies: these are approved by the Board of Directors and take into account legal requirements and good governance recommendations in this connection. They determine the general guidelines or principles governing Bankia's governing bodies, functions, activities and processes, establishing a framework for action that lends legal certainty.

The purpose of these policies is to establish guidelines and criteria to govern the Bank's decisions in certain areas of action (treasury shares, investments, financing, risk control and management, sustainability, etc.) and to influence the foundations of Bankia's governance model (corporate governance, Group structure, etc.), as well as certain aspects relating to the mode of operation of the Board of Directors (selection of directors, remuneration of directors and senior executives, etc.) and shareholder relations (communication strategy, dividends, etc.). In addition, the Board of Directors may approve other corporate policies that may be necessary to set strategies and management criteria and for monitoring and supervision thereof.

Bankia's Corporate Governance System comprises, inter alia, the following policies:

- Bankia Group corporate governance and organisational structure policy.
- Internal governance policy.
- Policy on information, communication, contacts and involvement with shareholders, institutional investors, proxy advisors and other stakeholders.
- Policy on the suitability of directors, general managers and other key function holders at Bankia.
- Policy on the selection, diversity, integration and training of directors.
- Remuneration policy for directors and remuneration policy for general managers or those performing senior management duties reporting directly to the Board, executive committees, the executive chairman, the CEO or directors with executive duties.
- Senior management selection and appointment policy.
- Risk control and risk management policies.
- Investment and financing policy.
- Sustainable management policy.
- Dividend policy.
- Treasury shares policy.
- Conflicts of interest policy.
- Regulatory compliance policy.
- New products policy.
- Recovery plan.
- Succession plan for the chairman, CEO, independent directors and senior executives.

PROGRESS IN CORPORATE GOVERNANCE

Determination of the number of Board members, appointment and re-election of Board members

At the Ordinary Annual General Meeting held in March 2020, the shareholders passed the following resolutions:

- To set the number of members of the Board of Directors at 13.
- The appointment as director of Ms. Nuria Oliver Ramírez, as independent director, for a four-year term.

- The re-election as directors of Mr. José Sevilla Álvarez (as executive director), Mr. Joaquín Ayuso García, Francisco Javier Campo García, Ms. Eva Castillo Sanz, and Mr. Antonio Greño Hidalgo (all as independent directors) for a four-year term.

Re-election of CEO

The Board of Directors, at its meeting held on 27 March 2020, resolved to re-elect Mr. José Sevilla Álvarez as the Bank's CEO based on the prior favourable report of the Appointments and Responsible Management Committee and the Remuneration Committee.

Renewal of the composition of the Board of Directors committees

The Board of Directors approved several changes in the composition of the Board of Directors committees, consisting of:

- Re-election of Mr. Francisco Javier Campo García and Mr. Antonio Greño Hidalgo as members of the Audit and Compliance Committee.
- Appointment of Mr. Francisco García Campo García as chairman of the Audit and Compliance Committee, replacing Mr. Antonio Greño Hidalgo.
- Re-election of Ms. Eva Castillo Sanz (chairwoman), Mr. Joaquín Ayuso García and Mr. Francisco Javier Campo García as members of the Appointments and Responsible Management Committee.
- Re-election of Mr. Joaquín Ayuso García as member of the Remuneration Committee and appointment of Mr. Antonio Greño as member and chairman of the same committee.
- Re-election of Mr. José Sevilla Álvarez (chairman) and Ms. Eva Castillo Sanz as members of the Board Risk Committee.
- Re-election of Mr. Joaquín Ayuso García (chairman) and Mr. Antonio Greño Hidalgo as members of the Risk Advisory Committee, and appointment of Ms. Laura González Molero as a member of this committee.

Ratification of the appointment of the Lead Independent Director

The Board of Directors ratified Ms. Eva Castillo Sanz in her position as Lead Independent Director until finalisation of the three-year term for which she was appointed.

Amendment of the Regulations of the Board of Directors: creation of the Technology and Innovation Committee and adaptation to the Code of Good Governance, and amendment of the Regulations of the Audit and Compliance Committee and the Appointments and Responsible Management Committee

In May 2020, the Board of Directors resolved to amend the Regulations of the Board of Directors, consisting of the introduction of article 14 bis, which regulates the Technology and Innovation Committee.

On the same date, the Board of Directors resolved to set up the Technology and Innovation Committee within the Board of Directors, and agreed that it would be composed of Mr. José Ignacio Goirigolzarri Tellaeché (chairman), Mr. Francisco Javier Campo García, Ms. Eva Castillo Sanz, Ms. Nuria Oliver Ramírez and Mr. Antonio Ortega Parra (as members).

In addition, in December 2020, the Board of Directors agreed to amend the Regulations of the Board of Directors, the Regulations of the Audit and Compliance Committee and the Regulations of the Appointments and Responsible Management Committee to adapt them to the revision of the Good Governance Code for Listed Companies approved by the CNMV.

Annual review of the Corporate Governance System

In compliance with Bankia's Corporate Governance System, in 2020 the following Corporate Policies, inter alia, were reviewed and updated:

- Policy on the Suitability of Directors, General Managers and Other Key Function Holders at Bankia, and the Policy on the Selection, Diversity, Integration and Training of Directors.
- Senior Management Selection and Appointment Policy.
- Conflicts of Interest Policy.
- Sustainable Management Policy.
- Group Corporate Governance and Organisational Structure Policy.
- Dividend Policy.
- Investment and Financing Policy.

The Internal Governance Policy, which systematises Bankia's governance structure by also incorporating the recommendations of the Internal Governance Guidelines EBA/GL/2017/11, has also been approved, as has the new Policy on Information, Communication, Contacts and Involvement with shareholders, institutional investors, proxy advisors and other stakeholders. The related content has been expanded and two policies included as provided for in recommendation 4 of the Good Governance Code.

ANNUAL ASSESSMENT

In 2020 the entity carried out individual internal assessments of the Chairman, the Chief Executive Officer, the Independent Coordinating Director, the operation of the Board of Directors, the chairs of the Board's committees, and each Board member.

The Chair of the Board of Directors works closely with the Chair of the Audit and Compliance Committee and the Chair of the Appointments and Responsible Management Committee in organising the assessment of the Board of Directors. Also, the Board of Directors assesses the performance of the Chair on the basis of a preliminary report drawn up by the Appointments and Responsible Management Committee, the process being coordinated and supervised by the Independent Coordinating Director.

ANNUAL SUITABILITY ASSESSMENT

The suitability of directors, general managers or similar positions and key personnel is reviewed on an annual basis and involves approximately 80 people.

All persons subject to the suitability assessment have confirmed that they meet the commercial and professional suitability requirements set out in the Bankia Group's Suitability Handbook.

As regards the members of the Board of Directors, all the people evaluated declared that they were in a position to exercise good governance of the bank and, on this basis, there were no issues giving rise to a conflict of interest or preventing them from devoting sufficient time to their duties.

The lack of suitability is grounds for removal from office.

DIRECTOR COMPETENCY MATRIX

Among other duties, the Appointments and Responsible Management Committee is tasked with drawing up a matrix showing the necessary skills and competencies of the Board of Directors, defining the skills and knowledge of the candidates for directors, especially those of executive and independent directors. This matrix is a tool to help the committee define the functions and duties associated with each position to be filled, as well as the skills, knowledge and experience best suited to that position.

The Director Competency Matrix is updated periodically and published on Bankia's corporate website.

STRUCTURE OF THE DIRECTORS' POWERS

	José Ignacio Goirigolzarri	Jose Sevilla	Antonio Ortega	Carlos Egea	Joaquín Ayuso	Fco. Javier Field	Eva Castillo
Type or nature	Executive	Executive	Executive	Other External	Independent	Independent	Independent Coordinator
Number of years on the Bankia Board	7	7	5	2	7	7	7
Committee memberships	(6)	(5)	(6)	(1)	2 (3) (4)	1 (2) (6)	2 (5) (6)
Board memberships	(A) (B)	(A)	(A) (C)		(D)	(G)	(E)
Previous Experience							
Experience in Senior Management in banks/financial institutions	✓	✓	✓	✓			✓
Senior management experience in other sectors (non-financial)	✓		✓	✓	✓	✓	✓
Areas of experience/competence							
Credit institutions	✓	✓	✓	✓	✓	✓	✓
Financial markets	✓	✓	✓	✓	✓	✓	✓
Risk management	✓	✓	✓	✓	✓	✓	✓
Auditing/Accounting	✓	✓	✓	✓	✓	✓	✓
Strategic Consultancy			✓		✓	✓	
Legal/Regulatory framework	✓	✓	✓		✓	✓	✓
Public sector							
Technology sector	✓	✓	✓				✓
Tourism/Transportation Sector					✓	✓	
Industrial sector				✓	✓	✓	✓
Consumer/Distribution Sector						✓	
Real estate sector					✓		
Teaching/Research	✓	✓	✓	✓			

	Jorge Cosmen	José Luis Feito	Fernando Fernández	Laura González	Antonio Greño	Nuria Oliver
Type or nature	Independent	Independent	Independent	Independent	Independent	Independent
Number of years on the Bankia Board	7	7	7	1	3	[]
Committee memberships	(3)	(1)	1 (4) (5)	2 (3) (4)	1 (3) (4)	(6)
Board memberships	(F) (H) (I)			(K) (L) (M)	(J)	
Previous Experience						
Experience in Senior Management in banks/financial institutions		✓	✓			
Senior management experience in other sectors (non-financial)	✓	✓	✓	✓	✓	✓
Areas of experience/competence						
Credit institutions	✓	✓	✓		✓	
Financial markets	✓	✓	✓		✓	
Risk management			✓		✓	✓
Auditing/Accounting	✓	✓	✓	✓	✓	
Strategic Consultancy		✓	✓	✓		✓
Legal/Regulatory framework					✓	
Public sector		✓	✓			✓
Technology sector				✓		✓
Tourism/Transportation Sector	✓					
Industrial sector	✓	✓	✓	✓		✓
Consumer/Distribution Sector				✓		
Real estate sector						
Teaching/Research		✓	✓	✓		✓

- (1) Audit and Compliance Committee
 (2) Appointments and Responsible Management Committee
 (3) Remuneration Committee
 (4) Risk Advisory Committee
 (5) Board Risk Committee
 (6) Technology and Innovation Committee

- (A) BFA, Tenedora de Acciones, S.A.U.
 (B) Confederación Española de Cajas de Ahorros (CECA)
 (C) Cece Bank, S.A.
 (D) Adriano Care Socimi, S.A.
 (E) Zardoya Otis, S.A.
 (F) National Express Group Plc.
 (G) Meliá Hotels International, S.A.

- (H) General Técnica Industrial, S.L.U.
 (I) Quintorge, S.L.
 Liberty Seguros, Compañía de Seguros y Reaseguros S.A.
 (K) Acerinox, S.A.
 (L) Grupo Ezentis, S.A.
 (M) Viscofan, S.A.

STRUCTURE OF THE DIRECTORS' POWERS

	José Ignacio Goirigolzarri	José Sevilla	Antonio Ortega	Carlos Egea	Joaquín Ayuso	Fco. Javier Field	Eva Castillo
Diversity							
Gender	M	M	M	M	M	M	F
Training / International Experience	USA China Portugal Mexico Argentina Chile PERU Colombia Puerto Rico Brazil Venezuela Italia	Mexico Argentina Chile Peru Colombia Puerto Rico Brazil Venezuela	Portugal Belgium Morocco Puerto Rico Mexico Peru Colombia Venezuela Argentina Chile Italy	-	United States Canada UK Italy Chile Colombia Portugal Ireland Australia	France Portugal Grecia Turkey Argentina Brazil China Italy	Holland Belgium Luxembourg Denmark Norway Sweden France Italy UK Germany Czech Republic Slovakia Ireland Russia Greece Portugal Turkey United Arab Emirates Saudi Arabia Bahrein Lebanon Israel USA Brazil Argentina Mexico South Africa
Time as director	33	10	26	30	25	34	14

STRUCTURE OF THE DIRECTORS' POWERS

	Jorge Cosmen	José Luis Feito	Fernando Fernández	Laura González	Antonio Greño	Nuria Oliver
Diversity						
Gender	M	M	M	F	M	F
Training / International Experience	United States UK France Portugal Switzerland Belgium China	United States France	United States Chile Peru Bolivia Colombia Costa Rica Argentina Vietnam Portugal	Portugal Grecia Norway Denmark Finland Sweden USA Hong Kong Brazil Mexico Colombia Panama Costa Rica Guatemala Venezuela Ecuador Peru Chile Uruguay Argentina	UK Mexico Honduras	United States Japan China UK Germany Ireland Finland Portugal Holland Belgium Italy Switzerland Luxembourg Canada Mexico Colombia Brazil Peru Mozambique
Time as director	8	10	7	12	4	

SUCCESSION PLAN

Bankia has a Succession Plan in place in accordance with regulatory requirements, recommendations and corporate governance best practices, which is updated regularly.

Its main aim is to ensure business and leadership continuity and identify suitable successors for the main positions at the entity. It is also used to create development and career plans to ensure that candidates for top positions at the bank will be ready to take responsibility when the time comes.

The scope of application of the plan includes the following management positions: senior management (chairman, CEO and management committee), corporate directors and other key positions.

COMPLIANCE WITH THE RECOMMENDATIONS OF THE CODE OF GOOD GOVERNANCE

In June 2020, the Spanish National Securities Market Commission published a partial revision of the Code of Good Governance for Listed Companies.

Bankia remains committed to the code and the compliance with its recommendations.

INDEPENDENCE

Bankia's Board of Directors is made up of 13 directors, 9 of which are independent directors, i.e. 69.23% of the directors are independent directors. This complies with recommendation 17 of the Good Governance Code of Listed Companies, which recommends that the number of independent directors should represent at least half of the total number of directors.

In accordance with the articles of association (article 38.3), the term independent director shall have the meaning attributed to it by the applicable regulations, i.e. independent directors are those who, appointed on the basis of their personal and professional qualifications, may perform their duties without being dependent on dealings with the Company or its Group, its significant shareholders or its management.

CONTINUOUS TRAINING OF THE BOARD OF DIRECTORS

The bank delivers a regular training programme to expand the knowledge of Board members on economic and social matters and concerns. Course content is updated annually in response to the changing needs of directors, regulatory requirements and international best practices.

A total of 8 training sessions for the directors were held in 2020. The following training content has been developed:

- Risk models - Regulatory compliance.
- Regulatory developments.
- Delegation of functions at credit institutions (regulatory framework and main developments).
- Cybersecurity model (description of the model, areas of action, initiatives and main trends).
- Sustainable business and financing (framework for action committed to ESG criteria).
- New insurance distribution directive (IDD, with impacts on the distribution model, main developments, adaptation of the regulation).
- Reform of interest rate benchmarks (impact on retail and wholesale financial markets, legal transition, fallback clauses and challenges of the transition).
- Cryptocurrency and blockchain (introduction, characteristics, operation, current situation and risks in the financial sector) and innovation (5G and quantum computing).

In addition, the members of the Board of Directors receive recurring information on current economic and financial matters, sustainable management, technological innovation and banking and regulatory rules.

CONFLICTS OF INTEREST

For Bankia, identifying and managing potential conflicts of interest is one of the top priorities when it comes to corporate governance. The bank has a number of reporting and decision-making mechanisms to aid it in this respect, notably:

- All directors must make an initial declaration of potential conflicts at the time they take office. This declaration must be updated immediately in the event of a change in any of the circumstances declared or if new circumstances emerge.
- Directors must take steps to avoid any situation in which their own interests or those of their principal may conflict with those of Bankia or with their duties to the bank.

They must also discharge their duties in accordance with the principle of personal responsibility, exercising their own judgement, independently of any instructions from or ties to third parties.

- Directors must promptly notify the Board of Directors of any direct or indirect conflict that they themselves, or persons related to them, may have with the interests of Bankia. They must also refrain from attending meetings or taking part in discussions on matters that concern them directly or indirectly, whether personally or through related persons.

Bankia has drawn up a Conflicts of Interest Policy, which sets out the general rules on how to manage and resolve conflicts of interest. These are implemented and supplemented by the provisions of each of the rules and procedures that make up the internal rules governing potential conflicts of interest. In this respect, among the main internal rules covering aspects related to the system applicable to conflicts of interest are the following:

- Regulations of the General Meeting of Shareholders of Bankia
- Regulations of the Board of Directors
- Regulations of the Audit and Compliance Committee
- Regulations of the Appointments and Responsible Management Committee
- Regulations of the Remuneration Committee
- Bankia Group Corporate Governance and Organisational Structure Policy
- Internal Rules of Conduct in the Securities Markets
- Bankia Group Code of Ethics and Conduct

BOARD REMUNERATION

Bankia's current Director Remuneration Policy is approved by the shareholders at the Annual General Meeting, as proposed by the Board of Directors, and covers the period from 2019 to 2021. The policy's guiding principle is strict compliance with the regulations governing the remuneration systems of credit institutions, and it is also based on a number of additional principles, including customer focus, gender equality and the balance of the remuneration components, strategy and the medium- and long-term time horizon.

It is important to bear in mind that in this area the regulations relating to the remuneration systems of institutions financially supported by the Fund for Orderly Bank Restructuring (FROB) apply to Bankia.

Bankia's Board Remuneration Policy is there to encourage the sustainable achievement of the bank's strategic objectives. It also aims to bring the remuneration system into line with the recommendations of the supervisory bodies, uphold the interests of shareholders and ensure prudent risk management.

Bankia's remuneration system set out in this policy is applicable to any director with executive functions who joins the Board of Directors during its term.

Components of Board members' remuneration

Remuneration consists of a fixed component, depending on the position held and functional and personal allowances, and a short- and long-term variable component, based on the level of fulfilment of quantitative targets of the priorities most relevant to Bankia's strategy, such as maintaining a sound capital base and compliance with strategic plans and/or reorganisation plans: requirements derived from capital self-assessment, the planning of liquidity needs, control policies and risk management.

The variable remuneration system applicable to executive directors has a series of safeguards in place for accrual and payment. Payment of the variable remuneration of executive directors, both in cash and shares, is deferred for three years as from accrual thereof in the case of annual variable remuneration and five years for multi-year variable remuneration. Variable remuneration will accrue only to the extent that it is sustainable, based on Bankia's overall situation, and only if it is justified on the basis of the bank's earnings and results, contingent on the three following considerations:

1. Shareholder interests.
2. Prudent risk management.
3. The generation of long-term value for the bank.

In addition, the Bank of Spain is the supervisory body that expressly authorises the amount, accrual and payment of this variable remuneration.

Under these criteria, the fixed remuneration of the bank's executive directors may not exceed EUR 500,000 per year, while their variable remuneration is subject to a cap of 60% of their annual fixed remuneration.

Meanwhile, directors who do not discharge executive functions receive maximum annual pay of EUR 100,000 and do not receive any amount as variable remuneration.

None of the members of Bankia's Board of Directors receive any further amount as attendance fees or remuneration for seats held on the Board's committees.

The Chairman of Bankia, José Ignacio Goirigolzarri, received a fixed salary of EUR 500,000 in 2020, the same amount as in the previous year. The same fixed remuneration of EUR 500,000 was also paid to José Sevilla and Antonio Ortega. As regards variable remuneration, in 2020 the executive directors renounced any variable remuneration.

Overall, Bankia's Board of Directors received a total of EUR 2.47 million in 2020. The Group's senior management personnel received a total of EUR 5.47 million.

Share-based variable remuneration

In accordance with the system regulated in the Bankia Director Remuneration Policy, 50% of the variable remuneration of executive directors is paid in Bankia shares, provided that the terms and targets set for receipt of the variable remuneration are met.

The maximum percentage of Bankia shares authorised for delivery to executive directors is 0.0151% of the bank's current share capital at the time of approval of the policy in 2019, which is distributed equally in each of its three years of validity, i.e. 0.005033% of the share capital on an annual basis.

To calculate the share price, the value equivalent to the average share price in the last three months of each year is taken, and the number of shares is adjusted proportionally if necessary as a result of a share capital transaction (including a split or grouping of the total number of Bankia shares).

Applicable malus and clawback clauses

The receipt of variable remuneration is subject to malus and clawback clauses applicable if any of the circumstances provided in the policy apply to any Board member (insufficient financial performance, significant failures in risk management, penalties handed down for breach of the code of conduct and/or internal regulations, breach of the suitability conditions, etc.).

These clauses are applicable both to active directors and to those who have resigned but still have remuneration to be received. The Board of Directors, at the proposal of the Remuneration Committee, determines whether the circumstances for application have been met.

Since the appointment of the current Board of Directors in 2012, these clauses have not applied to any Board member.

Compensation agreed or paid in the event of termination of duties as executive director

In the event of a removal due to the termination of the relationship linking the executive directors to Bankia, in accordance with current regulations, and as long as Bankia has not fully repaid the financial aid received, compensation may not be paid in excess of the lesser of the following amounts: EUR 1 million or two years' fixed remuneration.

Compensation includes any amount of a compensatory nature that the executive director may receive as a consequence of termination of contract and the sum of all the amounts that may be received may not exceed these limits.

Executive director contracts currently provide for compensation equal to one year of the director's fixed remuneration, in addition to any compensation for post-contractual non-compete agreements. Furthermore, the contracts of executive directors include a clause stipulating that any compensation, indemnity or amount received by the director in the event of contract termination must comply with the law in force and its implementing regulations. In this connection, compensation will be based on the results obtained by the bank over time, will not reward poor performance or misconduct and will include the ex-ante and ex-post adjustments required by Bank of Spain Circular 2/2016 on supervision and solvency and the EBA (European Banking Authority) Guidelines.

Name	Salaries ¹	Fixed compensation ¹	Short-term variable remuneration ^{1 3}	Long-term variable remuneration ³	Remuneration for membership of Board committees ¹	Termination benefits ¹	Total 2020 ¹
D. José Ignacio Goirigolzarri Tellaheche ²	500	0	0	0	0	0	500
D. José Sevilla Álvarez ²	500	0	0	0	0	0	500
D. Antonio Ortega Parra ²	500	0	0	0	0	0	500
D. Carlos Egea Krauel	0	100	0	0	0	0	100
D. Joaquín Ayuso García	0	100	0	0	0	0	100
D. Francisco Javier Campo García	0	100	0	0	0	0	100
D ^a Eva Castillo Sanz	0	100	0	0	0	0	100
D. Jorge Cosmen Menéndez-Castañedo	0	100	0	0	0	0	100
D. José Luis Feito Higuera	0	100	0	0	0	0	100
D. Fernando Fernández Méndez de Andés	0	100	0	0	0	0	100
D. Antonio Greño Hidalgo	0	100	0	0	0	0	100
D ^a Laura González Molero	0	100	0	0	0	0	100
D ^a Nuria Oliver Ramírez ³	0	74	0	0	0	0	74

1. In thousands of euros

2. The executive directors have renounced any variable remuneration in 2020.

3. Ms. Oliver was appointed as a Board member with effect as of 3 April 2020, with total remuneration of EUR 100,000 per year. The amounts shown correspond to the period from 3 April to 31 December 2020.

	Short-term remuneration ²	Long-term remuneration ²	Post-employment benefits ³	Termination benefits	Total ⁴
Senior management ¹	4,771	414	286	0	5,471

1. In thousands of euros. Includes information on all members of the Management Committee except for the three who are members of the Board of Directors.

2. The amount of variable remuneration accrued in 2020 is pending the pertinent authorisation and approval envisaged in current legislation.

3. Reflects contributions made in respect of pensions and life insurance premiums.

Information for 2019:

Name	Salaries ¹	Fixed compensation ¹	Short-term variable remuneration ^{1,3}	Long-term variable remuneration ³	Remuneration for membership of Board committees ¹	Termination benefits ¹	Total 2019 ¹
Mr. José Ignacio Goirigolzarri Tellaeche	500	0	213	57	0	0	770
Mr. José Sevilla Álvarez	500	0	213	57	0	0	770
Mr. Antonio Ortega Parra	500	0	213	57	0	0	770
Mr. Carlos Egea Krauel ²	147	51	0	0	0	0	198
Mr. Joaquín Ayuso García	0	100	0	0	0	0	100
Mr. Francisco Javier Campo García	0	100	0	0	0	0	100
Ms. Eva Castillo Sanz	0	100	0	0	0	0	100
Mr. Jorge Cosmen Menéndez-Castañedo	0	100	0	0	0	0	100
Mr. José Luis Feito Higuera	0	100	0	0	0	0	100
Mr. Fernando Fernández Méndez de Andés	0	100	0	0	0	0	100
Mr. Antonio Greño Hidalgo	0	100	0	0	0	0	100
Ms. Laura González Molero	0	100	0	0	0	0	100

1. In thousands of euros

2. On 26 March 2019, Mr. Carlos Egea Krauel stepped down from his executive duties on Bankia's Board of Directors, retaining his director status. The impact of his resigning from his executive duties resulted in an adjustment to the terms and conditions of the commercial contract entered into between Bankia and Mr. Egea Krauel, leaving him with the status of other external director as of 28 June 2019. The amounts shown correspond to the period from 1 January to 27 June 2019 as executive director and from 28 June to 31 December 2019 as other external director.

3. The amount of variable remuneration accrued by Mr. Goirigolzarri, Mr. Sevilla and Mr. Ortega in 2019 is pending the pertinent authorisation and approval envisaged in current legislation.

	Short-term remuneration ²	Long-term remuneration ²	Post-employment benefits ³	Termination benefits	Total ⁴
Senior management ¹	4,558	405	287	0	5,250

1. In thousands of euros. Includes information on all members of the Management Committee except for the three who are members of the Board of Directors.

2. The amount of variable remuneration accrued in 2019 is pending the pertinent authorisation and approval envisaged in current legislation.

3. Reflects contributions made in respect of pensions and life insurance premiums.

4. Includes the remuneration of Mr. Alvear, Mr. Galarza, Mr. López, Mr. Solla and Mr. Torres for the period from 24 January 2019 to 31 December 2019, as well as the amount accrued by Mr. Cánovas for the period from 1 January to 23 January 2019. In addition, Mr. Cánovas has not received any compensation, inasmuch as a post-contractual non-compete agreement is in place for a period of two years for an amount equal to two years' fixed remuneration.

b) Ethics and integrity

Bankia has a Code of Ethics and Conduct that sets out the rules and guidelines of professional conduct that must be adhered to and applied by all the entity's staff and officers and across all the Group's activities and businesses. Enforcement of ethical standards of behaviour and corporate integrity is essential in order to preserve trust in, and respect for, the entity.

The objectives of the code are to specify the conduct that is permitted and the conduct that is prohibited by the entity, and to establish the ethical principles and general rules that must govern the behaviour of the Group and its professionals towards one another and towards customers, shareholders, suppliers and all the individuals and institutions with which the entity, directly or indirectly, has relations. The Code, which is available on Bankia's corporate website and the employee intranet, revolves around the entity's principles and values.

These principles are implemented in several ways:

- **Corporate.** This aspect establishes the values that should guide the Group's relations with its professionals, customers, suppliers and society at large. In particular, it is intended to prevent institutional conflicts of interest through barriers which aim to avoid non-public information on its investment decisions and other activities from being used abusively or unlawfully.
- **Integrity in the markets.** Various procedures and controls have been designed and implemented to ensure compliance with international standards in this area. In particular, policies have been put in place to prevent market manipulation and misuse of inside information and to foster free market competition and transparency. Policies have also been developed to prevent corruption crime. Bankia has various control mechanisms for this purpose and training plans for managers and other staff. There are also specific recommendations to prevent corruption in supplier contracting, incentives and credit risk.
- **Personnel.** Accepting gifts, presents, money or commissions of any kind for operations carried out by Bankia and influencing matters in which there are actual or potential conflicts of interest is expressly prohibited.

The Group's employees have an obligation to know, comply with and help to enforce the Code of Ethics and Conduct. Bankia is committed to disseminating the code and sends regular reminders to employees to raise awareness and facilitate compliance. In addition, the entity has channels available through which they can report any evidence or proof of infringement of the code.

Bankia's Ethics and Conduct Committee is in charge of overseeing compliance with the Code and promoting ethical behaviour within the entity. To that end, it carries out cross-organisational actions to raise employee awareness of the need to prevent situations that could potentially lead to breaches of the code.

	2020	2019
Meetings of the Ethics and Conduct Committee	6	10

The duties of the Ethics and Conduct Committee include: taking the necessary measures to address ethically questionable conduct, processing reports received through the whistleblowing channel and possible conflicts of interest, and communicating any circumstances that may give rise to significant risks.

It also responds to queries, concerns and suggestions raised regarding compliance with the Code of Ethics. It evaluates the degree of compliance with the Code of Ethics each year and reports to senior management, while also proposing any changes that may be needed to bring the code into line with the development of the business. When it comes to disciplinary action, it takes decisions based on the powers and authorisations conferred in terms of human resources and organisation, especially where the proposal or resolution entails dismissal for disciplinary reasons.

Without prejudice to the responsibilities ascribed to the Audit and Compliance Committee, the committee submits a report on its activities to the Appointments and Responsible Management Committee, doing so at least once a year, if not more often.

	2020	2019
Percentage of employees under the obligation to know and comply with the Code of Ethics and Conduct	100%	100%
Percentage of employees trained in the Code of Ethics and Conduct (cumulative historical figures)	92.6%	90%
No. of employees trained in the Code of Ethics and Conduct	531	433
Percentage of new hires trained in the Code of Ethics and Conduct (cumulative historical figures)	83.7%	58%

CONFIDENTIAL WHISTLEBLOWING CHANNEL

Bankia has set up a confidential/anonymous Whistleblowing Channel to help enforce its Code of Ethics and Conduct. This channel facilitates the flow of information and the internal detection of bad practices by allowing

users to report issues via the digital platform or by email. It is available on Bankia's corporate website and the employee intranet.

The channel comes with its own set of regulations, approved by the Audit and Compliance Committee, which establish mechanisms for receiving, filtering, sorting and resolving reports or incidents in accordance with Spanish Data Protection Agency standards.

The channel is managed externally by a specialised company (currently PwC), under the oversight of the Ethics and Conduct Committee, which guarantees that all reports received are assessed independently and that the information is shared only with people whose collaboration is strictly necessary to investigate and resolve the matter.

A new feature was introduced in February 2019, whereby the whistleblowers can choose to report either confidentially or anonymously.

A total of 20 reports were received through the Confidential Whistleblowing Channel in 2020, 12 more than in 2019. Like the Code of Ethics and Conduct, the Confidential Whistleblowing Channel is available on Bankia's corporate website and the employee intranet.

	2020	2019
Reports received through the Confidential Whistleblowing Channel since its creation in 2013 (cumulative figures)	90	70

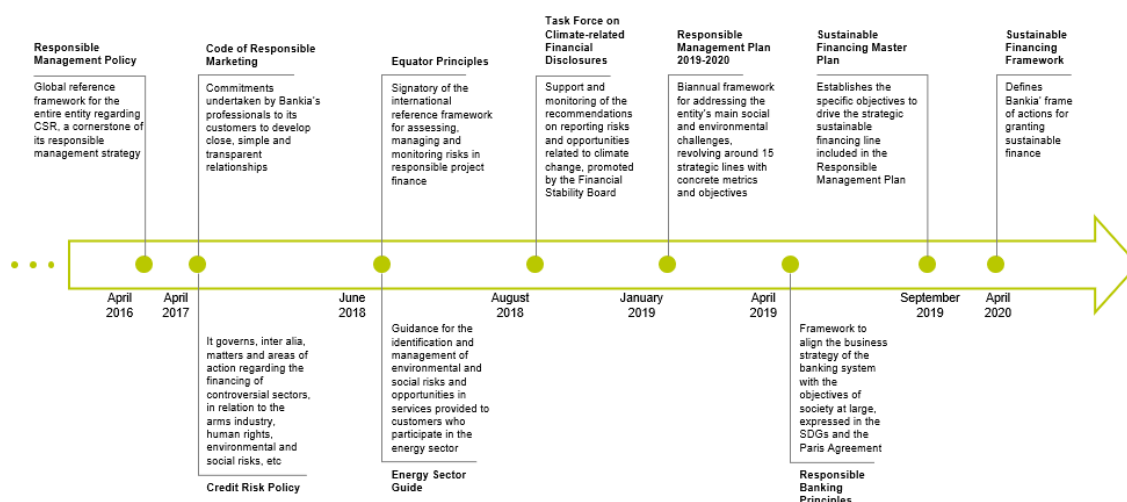
Type of reports received via the Confidential Whistleblowing Channel	2020	2019
Market abuse	0	0
Workplace bullying	2	4
Irregular conduct with suppliers	0	0
Misappropriation or syphoning-off of resources	0	0
Accounting and auditing aspects	1	1
Confidentiality or use of insider information	1	0
Conflicts of interest	0	0
Questions / suggestions	0	0
Falsification of contracts, reports or records	0	0
Infringements regarding securities or equities trading	0	0
Environmental protection	0	0
Information security	0	0
Physical safety	0	0
Bribery or corruption	0	0
Infringement of employee rights	0	0
Other	16 ¹	3

1. Of these reports, six were closed because they were duplications, two were closed due to failure of the whistleblower to provide information requested, another two were closed as they fell outside the channel's scope (customers), and the remaining six were forwarded to other uncategorised areas, such as improper conduct on social media or breach of COVID-19 protocols.

c) Sustainable financing

As part of sustainable financing, Bankia is commitment to environmental, social and good corporate governance (ESG) criteria across all areas of its business, based on a sensible and prudent combination of policies, standards and guidelines to steer its responsible management.

The bank has worked hard in recent years to define an extensive framework for doing sustainable business, as shown in the following timeline, which shows the principles adopted and the steady and progressive inclusion of ESG criteria in Bankia's policies and regulations.



The 2019-2020 Responsible Management Plan includes sustainable financing as one of its 15 strategic lines of action, which is why in 2019 the Management Committee approved the creation of the Sustainable Finance and Business Department. On an organisational scale, this forms part of Bankia's business structure and its main aim is to better mobilise resources under a framework of action committed to ESG criteria. This year Bankia has reiterated its ongoing commitment to sustainable finance, to cushioning the environmental impact of its activity and to becoming a benchmark in sustainable financing.

Likewise, in the last two years Bankia has also announced its adherence to UNEP FI and the Principles for Responsible Banking, as well as the Collective Commitment to Climate Action, promoted by the United Nations, all of which were ratified in September 2019 at the United Nations General Assembly.

Bankia has shown its strong support for the recommendations on financing and climate change promoted by the Financial Stability Board through the Task Force on Climate-related Financial Disclosures (TCFD), which the entity subscribed to in 2018. Specifically, the Sustainable Financing Master Plan was launched in October 2019 and sets out concrete objectives that contribute to making progress regarding the TCFD recommendations on the risks and opportunities of climate change. In order to bring this Master Plan to fruition, the Sustainable Financing Project was created shortly thereafter with a governance model that includes members of the Management Committee and corporate managers (key backers for the project to move forward) within the Steering Group.



As such, the Sustainable Financing Project involves the entity's main departments: systems, risks, business, financial management, sustainability, and organisation, among others, with the aim of building ESG criteria into the identification of business opportunities, related risk management, and the entity's reporting systems.

Five working groups were set up and throughout 2020 they have made progress towards achieving their respective goals established by the Master Plan. A total of 49 objectives were set and 31 have been met (63%). The remaining objectives have been affected by the approval in September of the merger with CaixaBank, and the postponement of regulatory developments. Consequently, 17 objectives are on hold and one has been rearranged for 2020. Examples of the objectives achieved – which will be explained, among others, below – include the roll-out of specific sustainable financing products for businesses, the implementation of a sustainable financing scorecard, or the analysis of climate risk scenarios through voluntary participation in the 2020 EBA pilot sensitivity exercise on climate risk.

Business strategy working group

The objectives of the working group include that of identifying and flagging business opportunities associated with sustainable financing, designing commercial solutions in response to those opportunities, and ensuring that the product base meets the technical characteristics needed to adequately monitor the activity.

On the corporate financing front, in 2020 two specific sustainable finance products were launched: Sustainable Leasing for Goods and Facilities, and Sustainable Loan for Business Activity. Bankia offers these products to promote sustainable financing in companies of all shapes and sizes, applying social or environmental criteria, such as the installation of renewable energy solutions (photovoltaic panels, biomass, etc.), investment in more energy-efficient equipment, or renewals of vehicle fleets focusing on sustainable mobility. Bearing in mind the importance of third-party collaboration to drive contributions to the sustainable development goals (SDGs), this year Bankia has worked on reaching agreements to promote sustainable investment, which resulted in the entity signing a collaboration agreement with Endesa to promote investments by businesses in sustainable energy solutions, with a particular emphasis on self-supply photovoltaic installations.

To encourage businesses and SMEs to include ESG criteria in their management and decision-making, Bankia launched two new free digital tools in late 2019, for customers and non-customers, via its online open environment “Soluciona Empresas”. These tools allow companies to find out how energy efficient they are so they can optimise their facilities and become more sustainable; while also giving them access to voluntary certification schemes in the realm of energy and environmental management. Soluciona Empresas also features a responsible management tool that lets companies find out how they perform when it comes to ESG aspects and identify possible areas for improvement. Using these tools, companies can conduct a self-assessment to help them make decisions that will positively impact their performance in terms of energy savings, productivity, competitiveness and care for the environment, and ultimately improve their reputation.

As regards Bankia Renting mobility solutions, the bank's agreement with Alphabet provides a wide range of options, including hybrid and electric vehicles, for company fleets, self-employed workers and individuals.

The entity's sustainable catalogue also includes products to promote sustainable consumer spending and financing among individuals, self-employed workers and businesses. For instance, Bankia offers the Sustainable Credit and the Sustainable Business Loan to finance the purchase of sustainable goods and services, such as hybrid or electric vehicles, low-consumption appliances and energy-efficient machinery, or the financing of facilities or renovation work to improve energy efficiency.

On the household front, the catalogue of sustainable products has been expanded with the addition of the *Hipoteca Verde* (green mortgage). This is a mortgage loan to finance purchases of new builds with a maximum energy rating of A or second-hand housing with an A or B rating. This mortgage complements the green financing granted under the auspices of the pioneering agreement between Bankia and the European Investment Bank (EIB) in 2019 to co-finance the construction of near-zero-energy housing in Spain.

The catalogue of sustainable savings and investment products has grown through the launch of a new index investment fund (which mimics an index), Bankia Índice Clima Mundial, in September. This is a new ethical fund which, alongside the Bankia Futuro Sostenible and Bankia Mixto Futuro Sostenible investment funds, expands Bankia's catalogue of socially- and environmentally-focused products. At year end, Bankia Asset Management (Bankia AM) offers pension plans and investment funds that incorporate ESG criteria, with a total of more than EUR 4,400 million in assets managed under these criteria.

Lastly, a “Sustainability” section has been designed on the www.bankia.es website to provide information on and access to all the aforementioned sustainable products and services, for customers and non-customers. This is a dynamic space which will be updated with further sustainable products, services and tools, as well as content to spread and promote sustainable financing and investment in the broadest sense.

Reporting working group

This group’s mission is to ensure centralised traceability and reporting of the implementation of sustainable products and the granting of sustainable financing. It establishes concrete metrics, with sustainable indicators, to be monitored through specific scorecards.

This work enabled the entity to roll out a Sustainable Financing Scorecard to perform monthly monitoring. Furthermore, in-depth tracking of wholesale sustainable finance transactions is carried out, specifically for project finance and corporate loans.

In 2020, the bank signed various financing arrangements that encourage customers to achieve sustainable goals by including financial clauses linked to the achievement of specific sustainability targets or indicators. These clauses may grant customers improved borrowing terms if they successfully meet the objective set, or conversely penalise them with a higher interest rate if they fail to meet the terms of the objective. This financing is known as sustainability-linked loans or KPI-linked loans.

Bankia has also advised on and structured financing operations for clean energy, including wind, photovoltaic and solar thermal power, under both project finance and corporate finance, which represent an overall generation capacity of 3,691 megawatts of clean energy.

Bankia’s total lending in the realm of wholesale sustainable finance amounted to EUR 2,616 million in 2020.

Moreover, the entity has also been involved in underwriting sustainable bond issuances totalling more than EUR 2,000 million.

Accordingly, the combined total of Bankia’s contribution to mobilising sustainable financial resources stands at EUR 18,675 million.

In addition to all this sustainable financing, which is mainly environmental in nature, the bank also provides social financing specifically designed to help self-employed workers, SMEs and large corporations deal with the difficult situation caused by COVID-19. This is particularly relevant in contributing to and supporting the preservation of jobs in production and business. On this front, Bankia has taken up a 9.4% share of the ICO COVID-19 guarantee facility with a total lending volume of EUR 10,941 million. Of this amount, 61% (EUR 6,706 million) corresponds to SMEs and self-employed workers, and 39% (EUR 4,235 million) to large companies. For SME and self-employed worker transactions 79% of the balance is secured, compared to 67% for large companies. Bankia’s ICO-backed loans account for 26% of its total lending to companies at the end of 2020.

Noteworthy regulatory developments this year include the approval of the EU Taxonomy Regulation in June. While the delegated acts on the mitigation and adaptation objectives have yet to be approved at the date of this report, the reporting working group has made progress this year on the centralised brands system to be implemented in the future in compliance with the Taxonomy and the regulatory expectations regarding the disclosure of non-financial information.

Funding working group

Its main mission was to devise a sustainable debt issuance framework in line with best market practices that will enable the bank to issue sustainable debt as and when strategically needed. It also had the aim of identifying transactions that could make up a sustainable finance asset portfolio to back sustainable bond issuances.

In practice, the bank’s funding plan for 2020, taking in all possible considerations regarding the need to issue instruments of any kind, dismissed the need to access debt markets in the first half of the year, thus the objective of devising a sustainable debt issuance framework was pushed back to 2021.

Risk management working group

This group involves members of the Deputy General Directorate of Credit Risk and the Corporate Risk Directive and its goals include: incorporating ESG criteria into the transaction approval process, fostering Board-approved proposals to include climate risk in the Risk Appetite Framework, and promoting the analysis of possible methodologies for climate risk sensitivity scenarios.

In connection with the consideration of ESG risks in transaction approvals, the working group has taken into account the recommendations of the EBA Guide on green lending origination and monitoring. Accordingly, the entity has designed an ESG Questionnaire covering the most relevant environmental, social and governance aspects of each borrower when a financial programme is submitted to the centralised Risk Committee. This questionnaire is complemented by another on climate risks, prepared by the risk analyst. Bankia also has a tool to assess the environmental risk of its business customers, which provides qualitative information on top of that offered by the financial rating.

One of Risk Management's functions is to create value and develop the business in accordance with the risk appetite established by the governing bodies. Specifically, the sectoral asset allocation exercise in 2020 factored in ESG considerations when establishing the desired distribution of new lending. In particular, it took into account the economic activity sectors (CNAE) that the EU Taxonomy identifies as contributing to the climate change mitigation and adaptation objectives, giving greater weight to business activities in which more CNAE taxonomies are concentrated, with the aim of increasing the sustainable proportion of the balance sheet.

In 2020 Bankia actively participated in the sensitivity analysis on climate risk which the European Bank Authority encouraged all European institutions to voluntarily perform as part of their risk assessments. The exercise ran from May to December and involved 29 entities from 10 countries. This is the first European analysis of its kind, consisting of estimating the degree of alignment of credit exposures with the criteria established by the EU Taxonomy in terms of whether an exposure is deemed environmentally sustainable.

Governance working group

This group's mission is to review how the sustainable financing project fits in the Responsible Management governance framework, establish a sustainable financing framework and ensure that the entity's different policies include ESG criteria whenever applicable.

In this regard, in April the Management Committee approved the Sustainable Financing Framework and the Guide on the inclusion of ESG criteria in corporate policies. Both documents were also reported to the Appointments and Responsible Management Committee.

The main aim of the Sustainable Financing Framework is to define Bankia's frame of action for the granting of sustainable financing. It aims to meet the following four overarching objectives:

1. Give the bank a framework for proposing sustainable financing products.
2. Contribute to the achievement of the United Nations sustainable development goals (SDGs), identified by Bankia as priorities within its sustainable strategy.
3. Promote the consideration of climate risk in the proposal of new financing transactions (observing the regulatory principles and standards applicable at any given time).
4. Ensure that the sustainable transactions and assets financed could back sustainable debt issuances in the future.

The "Guide on the inclusion of ESG criteria in corporate policies" serves as a work tool that steers the various groups tasked with updating the entity's different corporate policies in their scheduled annual reviews.

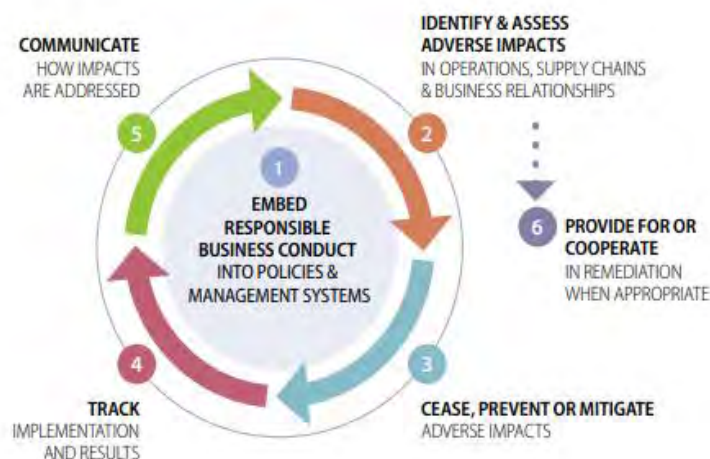
Looking forward, Bankia aspires to align its activity with the new developments in sustainability and sustainable financing emerging in the European Union and, in particular, with incoming domestic law and regulations, in a bid to accelerate the transition towards a sustainable economy free of greenhouse gas emissions that effectively contributes to the fight against global warming.

d) Human Rights

Bankia is firmly committed to sustainable development at both business and social level. Showing and enforcing respect for human rights is therefore part and parcel of the bank's business and guides its relations with stakeholders. Bankia, as a provider of financial products and services, operates within the regulatory framework of human rights and complies with applicable international standards.

Bankia's Policy on the Protection and Respect for Human Rights, approved by the Board of Directors, is inspired by the premises enshrined in the UN Guiding Principles on Business and Human Rights, and defines the entity's responsibilities in terms of:

- Respect for human rights when dealing with employees, customers, suppliers and business partners and the wider community, through the implementation of prevention, communication and sanctioning mechanisms.
- Pledging its commitment to human rights, focused on:
 - Assessing and understanding the social and economic environment.
 - Recognising and respecting the identities of individuals and their communities.
 - Establishing a system of proactive dialogue with stakeholders.
 - Promoting knowledge and ensuring compliance with this commitment
- Conducting due diligence processes to identify and evaluate potential impacts; making the conclusions of the assessment processes part of internal processes so that appropriate measures can then be taken to prevent and mitigate possible impacts; monitoring and benchmarking the effectiveness of those measures; and, last but not least, disclosing the measures taken to the outside world.



In implementing the new Policy of Protection and Respect for Human Rights, in 2020 Bankia defined the entire due diligence process, which is still being developed and implemented, that will allow it to:

- Make human rights part of its risk management, decision-making and governance procedures, under the responsibility and with the full commitment of senior management.
- Expand the scope of its existing due diligence procedures to embrace human rights issues.
- Track risks through relationships with customers, suppliers and business partners.

- Ensure transparency when it comes to the policies and procedures put in place to manage human rights risks across all the different areas and departments of the bank by reporting on their performance.
- Involve and engage customers, companies within the sector and other stakeholders to share good practices, address common problems and offer real solutions.

Bankia has split its human rights risk assessment process into the following stages, in order to delimit the risks and define the criteria to be used when evaluating, prioritising and managing the risks:



Bankia has devised a process to identify those human rights it can positively impact, particularly labour-related, and it relies on guiding source material such as its Policy on Protection and Respect for Human Rights, as well as international conventions and frameworks for human, civil and political rights and international treaties, especially on labour matters. This identification allows the entity to generate a list of risks (and opportunities) for its various business units and corporate areas.

This analysis factors in the risks inherent to the financial sector, along with Bankia's own risk profile and control environment, in aspects such as policies and plans, internal procedures, management indicators, training, communication channels and remediation mechanisms, in order to focus directly on the most severe and likely negative impacts as a priority.

This due diligence procedure will help prevent incidents from arising, while also ensuring that control mechanisms are in place and guaranteeing the proper management of opportunities for continuous improvement.

Lastly, at the end of 2020 Bankia devised and launched an online training course on human rights for all employees. The course aims to:

- Facilitate greater knowledge of human rights and the instruments that regulate and disseminate them.
- Provide information on the categories of rights.
- Dive deeper into what each of the rights constitutes: how they are regulated, how they are defined, how they can be implemented in companies, and what specific measures can be applied to ensure they are respected and prevent negative impacts.

e) People and talent management

The COVID-19 healthcare crisis has reshaped the way we approach customer relationships and made us contemplate new ways of organising, working and communicating within the organisation. This has necessitated efforts on the part of Bankia to guarantee the health of employees, lend continuity to the business, and support and serve our customers in the best way possible. All the bank's professionals have had to make major changes to tackle this scenario, combining remote and on-site working, underpinned by essential new technologies.

Worthy of note are the work shifts put in place across the branch network, which have been devised and coordinated in tandem by the heads of the commercial network and the people managers in each area.

This, coupled with the fact that the lion's share of central services employees were working remotely, meant that just a few weeks after the onset of the pandemic, upwards of 11,000 professionals were working remotely at the same time during the hardest moments of the healthcare crisis.

LABOUR AGREEMENTS, COLLECTIVE BARGAINING AND FREEDOM OF ASSOCIATION

Bankia maintains ongoing and smooth dialogue with worker representatives, signing a host of labour agreements on matters affecting employees in areas outlined in legislation and others considered important by the bank and unions for both the business and working environment.

Bankia supports the right to freedom of association and collective bargaining. The entity respects the right of all workers to form and join a trade union of their choice and exercise union activity within the company, which seeks to eradicate all forms of discrimination towards employees who engage in such union activity.

Bankia also guarantees enforcement of the Spanish Freedom of Association Act (Ley Orgánica de Libertad Sindical) through its own labour agreement, the provisions of which guarantee the effective right to freedom of association of worker representatives and are actually an improvement on the protection provided for by law.

On 15 July 2020 Bankia reached a Labour Agreement with the majority of worker representatives, which stipulated measures for worker conditions, including:

- The adoption of remuneration and professional development conditions.
- Improved employee benefits.
- The establishment of working hours adapted to the services in question.
- The definition of a digital disconnection policy.
- The adoption of mandatory equality and non-discrimination commitments in Bankia.

Likewise, the entity has maintained ongoing dialogue with the worker representatives to address the health crisis caused by COVID-19, holding extraordinary meetings with the State Health and Safety Committee and all union branches represented in Bankia.

2020 also saw the entities in the Spanish Association of Savings Banks (CECA), which includes Bankia, sign the Collective Bargaining Agreement for Savings Banks and Savings Financial Institutions for 2019-2023 with the majority of union representatives. This Collective Bargaining Agreement sets out the economic framework and labour conditions that will be in force for the next three years. The main measures agreed revolve around salary updates, improved holiday and leaves, the regulation of remote working – including the provision of materials by the company – and a distinction in such regulation from that during the COVID-19 pandemic, and digital disconnection, establishing good practices to achieve a work-life balance.

REMUNERATION POLICY

Bankia has a remuneration policy predicated on complying with regulations and upholding the following principles:

- Balance of components of remuneration
- Results-orientated and recognition of excellence
- Strategy and time frame. Remuneration is viewed as a medium to long-term strategic aspect that motivates performance, as well as driving results in the short term.
- Engagement of the bank with shareholders and customers. The amount of remuneration is directly linked to the level of achievement of the bank's targets, and the interests of shareholders and customers.
- Simplicity of regulation and communication. The different systems making up Bankia's remuneration system are regulated so that professionals know the total remuneration they could obtain at the end of the year, as well as the conditions they need to meet to achieve it.
- Compatibility of risk and management. The remuneration policy established is compatible with adequate and effective risk management, the business strategy, values and long-term interests, and it includes measures to avoid conflicts of interest.
- Internal fairness
- External competitiveness
- Gender equality

Remuneration of each professional is for all their actions in performing their duties both within the bank and at other group entities or investees. The components are as follows:

- Fixed remuneration. This is the main component of total remuneration and is set on the basis of the level of responsibility, the function performed and the principles of internal fairness and external competitiveness.
- Variable remuneration. Linked to additional or extraordinary contributions to the job and the amount depends on the level of achievement of the targets set. Main features:
 - It takes into consideration the overall earnings and results of the entity and of the unit to which the employee belongs and also an individual performance assessment.
 - Amounts are fully commensurate with the date of hiring, promotion or rotation, and the results achieved.
 - No amounts of variable remuneration are guaranteed.

	2020	2019
Percentage of employees eligible to receive variable remuneration	100%	100%

The variable remuneration policy ensures that no conflicts of interest will arise to the detriment of customers, secures compliance with rules of conduct for the provision of investment services, and prevents any incentives which could induce employees to place their own interests (or those of the company) ahead of customers'.

In determining variable remuneration, employee performance assessments not only consider sales volumes, but also other qualitative factors; e.g. compliance with regulatory requirements regarding conduct, equal treatment of customers and customer satisfaction.

A review is carried out annually to ensure that variable remuneration does not limit Bankia's ability to maintain a sound capital base and safeguard the interests of shareholders, customers and other stakeholders.

Remuneration

The following information was calculated based on the headcount at the 2020 year end. Annual remuneration is deemed to be 100% of fixed remuneration for the year, the annual variable remuneration received and the multi-year variable remuneration awarded in the year and/or accrued by the employee group in question.

Gender	Mean remuneration (Euros)		Median remuneration (Euros)	
	2020	2019	2020	2019
Men	59,493	58,338	53,932	52,904
Women	49,057	48,032	47,062	46,168
Total	53,621	52,543	50,209	49,106

Age	Mean remuneration (Euros)		Median remuneration (Euros)	
	2020	2019	2020	2019
Under 30	27,345	24,857	22,478	17,783
30 to 50	49,190	48,654	45,631	44,975
Over 50	63,051	63,226	56,863	57,191
Total	53,621	52,543	50,209	49,106

Professional category	Mean remuneration (Euros)		Median remuneration (Euros)	
	2020	2019	2020	2019
Management Committee ¹	552,865	588,989	514,999	569,886
Level I to Level IV	75,080	74,236	66,646	65,945
Level V to Level VII	52,229	52,349	51,538	51,602
Level VIII to Level XIV	39,529	39,018	38,904	38,525
Other	40,256	39,377	38,496	36,896
Total	53,621	52,543	50,209	49,106

¹ Includes information on all members except for the three who are members of the Board of Directors. As there is one woman on the Management Committee, no breakdown by gender is provided to protect the privacy of personal data.

	2020	2019
Average annual employee remuneration (fixed plus variable remuneration, excluding the total annual remuneration of the highest-paid individual)	€53,621	€52,543
Median annual total compensation for all employees (excluding the total annual remuneration of highest-paid individual)	€50,209	€49,106
Percentage increase in average annual employee remuneration (excluding the total annual remuneration of the highest-paid individual)	2.05%	1.31%
Annual remuneration of the highest-paid individual	€770,000	€770,000
Percentage increase in the annual remuneration of the highest-paid individual	0%	0%
Ratio of annual total compensation of the highest-paid individual to the median annual total compensation for all employees	15.3	15.7

Gender pay gap

The gender pay gap measures the differences between men's and women's salaries and is calculated as the difference between men's and women's salaries expressed as a percentage of men's earnings.

The information has been calculated based on the headcount at the 2020 year end. Annual remuneration is deemed to be 100% of fixed remuneration for the year, plus annual and multi-year variable remuneration.

Information on the gender pay gap is provided by job classification/professional category and in terms of average and median compensation.

Job / Professional category	Gender pay gap			
	Average		Median	
	2020	2019	2020	2019
Executive Directors ¹	N.A.	N.A.	N.A.	N.A.
Non-executive Directors	0.0%	0.0%	0.0%	0.0%
Executives ²	14.80%	15.3%	6.9%	8.0%
Other:				
Level I - Level IV	7.5%	7.4%	5.7%	5.3%
Level V - Level VII	3.0%	2.6%	1.9%	1.4%
Level VIII - Level XIV ³	3.2%	2.3%	3.3%	2.4%

1. Not applicable because all Bankia's executive directors are men.

2. Includes the compensation of members of the Management Committee who do not have a seat on the Board of Directors and branch office and central services managers, irrespective of their professional category as defined in the Collective Bargaining Agreement for Savings Banks and Savings Financial Institutions for 2019-2023.

3. Includes all staff who do not perform executive functions and the category of "Other". According to the Collective Bargaining Agreement for Savings Banks and Savings Financial Institutions for 2019-2023, this latter category covers employees holding positions or providing unskilled trade or speciality services not related to the financial business, lending, or any other specific activity of savings banks; e.g. concierge, surveillance, cleaning, telephone assistance, conservation and maintenance, and other similar services.

For information on the gender pay gap between similar or the same roles, Bankia has calculated an adjusted pay gap, understood as a linear regression model using only gender and similar or the same roles as the only variables. The result is a gap of 4.23%.

EQUALITY PLAN

In keeping with its commitment to equality and in order to unify the treatment of the conditions of all the entity's employees, Bankia deemed it necessary to revise the 2016 Equality Plan previously in force, following the complete and effective integration of all Banco Mare Nostrum personnel in Bankia.

Bankia aims to provide a healthy and productive working environment which channels the potential of the entity's workers. Bankia undertakes, inter alia, to ensure equal opportunities in recruitment and promotions, avoiding – at all times – any discrimination or inequality on the basis of age, gender, race, social standing, sexual identity, civil status, religion, union affiliation, or any other personal or social circumstance whatsoever, and to foster a working environment that is compatible with personal development, collaborating with employees to provide the best work-life balance possible.

To this end, the entity and worker representatives negotiated and agreed to an Initial Diagnosis of Bankia's environment, concluding that no gender inequality exists in the bank. On this front, the entity has policies on selection and hiring, promotion, remuneration and training, which prevent gender inequality from arising. Moreover, the entity has rolled out various policies and programmes to boost the presence of women in positions of responsibility such as talent programmes, diversity policies and the vacancy filling process.

In this respect, in July 2020 Bankia and the vast majority of union representatives agreed a new Equality Plan, comprising an orderly array of measures that actually and effectively achieve the objectives of equal treatment and opportunities among men and women, as well as eliminating all forms of gender discrimination.

Bankia's new Equality Plan sets objectives and a series of concrete measures geared towards achieving equal opportunities without gender discrimination. These include, among many others, ensuring that the Promotion System does not discriminate against any groups on the basis of gender, valuing candidates' suitability for the position based on their skills, abilities and personal fit – whilst making sure that positions of responsibility are always held by the most suitable people, within a framework of equal treatment and opportunities with no gender discrimination whatsoever.

This will be achieved by promoting further access to managerial positions by the least represented gender, guaranteeing that at least 45% of new appointments to managerial positions be filled by the least represented gender. Also, specific targets are set for the least represented gender.

Percentage of people on the bank's governing bodies and by professional category in each of the following diversity categories:

By gender	Headcount at 31.12.2020				
	Men		Women		Total
	No.	%	No.	%	
Professional category					
Executive directors	3	100.0%	0	0.0%	3
Management Committee	8	88.9%	1	11.1%	9
Level I to Level IV	2,259	64.8%	1,227	35.2%	3,486
Level V to Level VII	2,963	41.7%	4,135	52.3%	7,098
Level VIII to Level XIV	1,554	31.6%	3,366	68.4%	4,920
Other ¹	4	66.7%	2	33.3%	6
Total	6,791	43.8%	8,731	56.2%	15,522

1. According to the Collective Bargaining Agreement for Savings Banks and Savings Financial Institutions for 2019-2023, this professional category covers employees holding positions or providing unskilled trade or speciality services not related to the financial business, lending, or any other specific activity of savings banks; e.g. concierge, surveillance, cleaning, telephone assistance, conservation and maintenance, and other similar services.

	Headcount at 31.12.2019				
	Men		Women		Total
	No.	%	No.	%	
Professional category					
Executive directors	3	100.0%	0	0.0%	3
Management Committee	8	88.9%	1	11.1%	59
Level I to Level IV	2,231	65.1%	1,194	34.9%	3,425
Level V to Level VII	2,744	42.8%	3,670	57.2%	6,414
Level VIII to Level XIV	1,845	32.1%	3,909	67.9%	5,754
Other	3	75.0%	1	25.0%	4
Total	6,834	43.8%	8,775	56.2%	15,609

By age group	Headcount at 31.12.2020						
	Under 30		30 to 50		Over 50		Total
	No.	%	No.	%	No.	%	
Professional category	No.	%	No.	%	No.	%	Total
Executive directors	0	0.0%	0	0.0%	3	100.0%	3
Management Committee	0	0.0%	4	44.4%	5	55.6%	9
Level I to Level IV	0	0.0%	1,497	42.9%	1,989	57.1%	3,486
Level V to Level VII	0	0.0%	4,239	59.7%	2,859	40.3%	7,098
Level VIII to Level XIV	120	2.5%	4,503	91.5%	297	6.0%	4,920
Other	1	16.7%	3	50.0%	2	33.3%	6
Total	121	0.8%	10,246	66.0%	5,155	33.2%	15,522

	Headcount at 31.12.2019						
	Under 30		30 to 50		Over 50		Total
	No.	%	No.	%	No.	%	
Professional category	No.	%	No.	%	No.	%	Total
Executive directors	0	0.0%	0	0.0%	3	100.0%	3
Management Committee	0	0.0%	4	44.4%	5	55.6%	9
Level I to Level IV	0	0.0%	1,690	49.3%	1,735	50.7%	3,425
Level V to Level VII	1	0.0%	4,063	63.3%	2,350	36.6%	6,414
Level VIII to Level XIV	158	2.7%	5,263	91.5%	333	5.8%	5,754
Other	0	0.0%	2	50.0%	2	50.0%	4
Total	159	1.0%	11,022	70.6%	4,428	28.4%	15,609

	2020	2019
Average age of the workforce (years)	46.8	45
Average length of service (years)	20.7	19

Protocols to combat sexual and gender-based harassment

In 2016 Bankia implemented a Protocol on the Prevention of Workplace, Sexual or Gender-Based Harassment, agreed with the majority of union representatives, which prohibits any action or conduct, whether verbal or physical, that might impair the dignity of any employee and create an intimidating, hostile or humiliating working environment for the person subject to such abuse.

In this respect, Bankia actively enforces a policy to prevent and eliminate any behaviour constituting workplace, sexual or gender-based harassment in the workplace. To achieve this, it has a specific procedure in place to prevent workplace, sexual and gender-based harassment, providing mediation and a channel for the filing of complaints by victims, and to address and discipline such conduct where appropriate.

TALENT AND DIVERSITY MANAGEMENT

The healthcare crisis triggered by COVID-19 made Bankia contemplate new ways of organising its professionals, and of working and communicating within the entity, while guaranteeing the health of its employees at all times, lending continuity to the business, and supporting and serving our customers.

As a result of the circumstances unfolding in 2020, Bankia had to rethink its development activity, which involved the challenge of redesigning interviews and planned action to make them virtual. Despite these complex times, 570 interviews were carried out.

The process of identifying and developing talented employees entailed 125 promotions in the year: 14 within the Top 300 group, 20 within the Top 600, 52 branch managers and 39 deputy branch managers. In 2020 Bankia appointed three women corporate directors.

	2020	2019
No. of appointments to management positions filled internally	125	268
No. of employees promoted internally (men)	60	133
No. of employees promoted internally (women)	65	135

To achieve the best possible match between employee profiles and positions, a total of 2,862 changes of position were carried out during the year, both for non-managerial and managerial positions.

Overall, 23 initiatives were carried out to foster and develop internal talent, involving a total of 1,223 participants, most notably the Digital eSports Development Programme undertaken 100% virtually. The programme is framed within the need to develop new digital skills, including critical thinking, future vision, decision-making, confidence, drive, autonomy and communication. All this in an innovative and disruptive environment to take full advantage of new technologies. Since its launch as a virtual programme, 11 events have been organised and 127 professionals have participated, in addition to three more events in early 2021.

At the start of 2020 the last four groups took part in the fifth edition of the Programme for Senior Management (PAD), launched the year before, which gave 133 managers from the Top 300 the chance to hone the customer experience from a strategic perspective, focusing on diversity management to achieve excellent leadership.

The “Take the Initiative” programme launched at the end of 2018 came to an end in December 2020. This programme saw 20 managers from the branch network and central services talent pool receive mentoring from 20 senior executives in the entity, including corporate directors and members of the Management Committee. This exercise addressed various topics, notably networking due to the impact on female leadership.

The entity also carried out the “Accelerate” and “Revitalisation” programmes, focused on developing female and executive-track talent in the bank, respectively. The “Accelerate” plan added a further 15 professionals in 2020, bringing the total to 297 women.

The entity also provides *Atrévete* (Dare to) and Inclusive Leadership workshops, with a total of 282 participants in 2020; the “12 habits, 12 challenges” event, focused on the most frequent habits that slow down women’s access to positions of more responsibility; and Diversity with People Managers events, geared towards raising awareness of and delving into specific key topics such as networking and personal brand, with 41 participants.

Bankia collaborated on the design and launch of a crossover mentoring programming between the companies forming part of the CloisGap, Women for a Healthy Economy programme, which the bank joined in 2019. The entity contributed two mentors and two mentees to the programme.

2018-2020 Diversity Plan

In order to close the gap between men and women at the different management levels, the Management Committee approved the 2018-2020 Diversity Plan with the aim of evening out the presence of women in management positions with that of men, and ensuring sustainability in the medium term through the roll-out of talent identification and development programmes that guarantee the growth of women,

In early 2020 Bankia joined Bloomberg’s 2020 Gender Equality Index (GEI), which commended the equality policies implemented by the entity in recent years. This recognition positions the bank as a global leader in gender equality.

On this front, Bankia is a signatory of various initiatives that foster gender equality, such as the Women’s Empowerment Principles (WEP) endorsed by the United Nations Global Compact and UN Women.

Within the framework of the United Nations Global Compact 2030 Agenda, Bankia has intensified its commitment to gender equality through SDG 5 (Gender Equality), undertaking to increase gender diversity in

management positions. In this respect, with the goal of promoting the training of women in science, technology, engineering and mathematics, Bankia has collaborated with the UNIR Foundation to provide scholarships for 50 women in STEM fields.

Bankia has also signed the Code of Principles on Generational Diversity (Generation and Talent Observatory), which seeks to promote development based on equality, irrespective of age.

DIGITAL COMMUNITY TO EVOLVE THE DEVELOPMENT AND TALENT MODEL

During the last quarter of 2019, as part of Bankia's cultural transformation, the bank started the adoption of a skills and roles model.

The aim of this model is to provide the bank with the talent and knowledge required to tackle future challenges, evolving towards a new environment of skills and functions, in which each of the entity's professionals is responsible for their own development so as to improve their current and future employability. The bank is responsible for providing the necessary resources and mechanisms that enable this new model, in order to strengthen learning and the ability to continuously adapt (skills), encouraged by the possibility of seeing career paths (managerial or technical), and evolving the role of managers responsible for the professional development of their teams, and the HRBP (business partners), towards a more advisory role (expert advice). In this context, agility to adapt to changes and the ability to reskill constitute prime competitive advantages.

To achieve all this, in 2020 the organisation underwent a deep reflection to define the complete map of roles and skills, whilst identifying, from a strategic perspective, the organisation's most critical profiles and capabilities at present and in the future.

The definition process entailed 40 interviews with corporate directors and 31 panels with management from each of the organisation's areas, involving a total of 230 managers in a bottom-up exercise. This process culminated in a top-down calibration involving the bank's main executives, who added their medium to long-term strategic vision to determine Bankia's definitive skills and roles map.

A Digital Community was set up to implement the skills and roles model, with the aim of increasing meritocracy and transparency in the entity's development and talent processes. Bankia's Digital Community is what in agile terminology would be known as a tribe or hub. Its objective is to devise the new development and talent model in Bankia.

This community has operated under the agile methodology and has two squads working together to evolve and establish the conceptual and operational design of the new model (squad for the definition and implementation of the development and talent model) and to configure the HCM Cloud tool acquired to support the model and manage the talent information generated (squad for the implementation of the support tool). Both squads comprised people with different specialisations, from people management departments and other areas of the bank (internal digital communication, technology and operations, digital strategy and transformation, business, etc.).

One of the Digital Community's first lines of action was to gather feedback from the various areas of the organisation to understand their view of aspects related to meritocracy and the key components of the development and talent model.

The Digital Community's work focused on the definition and implementation of the skills assessment process to determine the level of improvement in personal skills and development areas of each group in the bank.

To ensure the assessment process was implemented correctly, a pilot test was carried out in the Corporate Directorate of Private Banking in June and July. To this end, the HCM Cloud tool implementation squad, under the agile methodology, was able to roll out and configure the process so it could be successfully launched on time in less than two months. This required the definition of the functional and technical requirements necessary for its implementation, as well as the connection of the HCM tool to the bank's other personnel information systems.

Once all the assessment phases were completed, the skill gaps detected were studied by managers and collaborators through Individual Development Plans, enabling training programmes to be defined to address such gaps.

The work of these squads defining and implementing the talent model laid the conceptual and operational foundations of the model, defining the assessment model, creating models to address the skill gaps detected, and establishing the process for defining the Strategic People Planning. The result was the definition of an initial approach, which enabled critical areas and roles to be identified, paving the way for the roll-out of specific training itineraries.

The scope of work performed by the definition and implementation squad included the design of the model for governing and updating the skills and roles system, as well as a model of common global profiles and management profiles.

Lastly, in 2020 the entity worked on evolving the roles of management and business partners in Bankia, with a view to strengthening and focusing their activity on the professional development and growth of the teams.

SELECTION

Bankia's external selection processes are geared towards managing hiring needs to fill positions which cannot be covered internally by the bank.

These processes and actions form part of Bankia's strategy of striving for excellence. External selection aims to increase the value of the organisation through the hiring of the best candidates available on the market based on the needs of each position. Responsible management of external selection bolsters the entity's competitive advantages and leadership, which are essential ingredients of success in a common project.

The description of the profile sought and the selection of the candidate are attuned to the bank's values and the skills defined for each function, taking into account the technical characteristics of the position to be filled at all times.

Every new professional is supported by the Deputy General Directorate of People and Culture, which monitors their performance and adaptation, thereby guaranteeing quality in the external selection process.

In 2020 most vacancies were filled internally. However, the bank's main lines of digital, organisational and cultural transformation derive from the need to incorporate external talent, principally specialists, to cover specific positions of a technical or technological nature (41 new hires).

In 2020 a total of 372 internal vacancies were published (26% management profiles and 74% non-management; 63% in the branch network and 37% elsewhere). A total of 956 people applied for these vacancies, amounting to 1,532 candidatures (some people opted for more than one vacancy). At year end, 56% of the processes published had been fully or partially covered.

Bankia's Dual Vocational Training programme entered its fifth year and a total of 42 students have joined Bankia's branch network since the programme's launch in 2015. With a combination of training and internships in the entity, the programme is supported by the bank's professionals, as tutors, who accompany students in their learning experience.

Despite the COVID-19 pandemic, students in the fourth edition of Bankia's Dual Vocational Training programme completed their training successfully and paved the way for the fifth edition, which maintains the same training plan as previous editions: two years alternating between classroom and on-the-job learning, making Bankia's the only Dual Vocational Training programme offered by a bank.

EMPLOYMENT INDICATORS

Total number of employees and distribution by gender, age, country and professional category (figures at 31 December of each year)

Gender	Workforce	
	2020	2019
Men	6,791	6,834
Women	8,731	8,775
Total	15,522	15,609

Age	Workforce	
	2020	2019
Under 30	121	159
30 to 50	10,246	11,022
Over 50	5,155	4,428
Total	15,522	15,609

Country	Workforce	
	2020	2019
Spain	15,514	15,603
China	3	3
Cuba	2	2
Morocco	3	1
Total	15,522	15,609

Professional category	Workforce	
	2020	2019
Executive directors	3	3
Management Committee	9	9
Level I to Level IV	3,486	3,425
Level V to Level VII	7,098	6,414
Level VIII to Level XIV	4,920	5,754
Other	6	4
Total	15,522	15,609

Types of employment contract

Type of contract	2020		2019	
	Number	%	Number	%
Permanent	15,522	100.0%	15,608	99.99%
Permanent part-time	0	0.0%	1	0.01%
Temporary	0	0.0%	0	0%
Total	15,522	100.0%	15,609	100.0%

Annual average of permanent, temporary and part-time contracts by gender, age and professional category.

Gender	Average headcount							
	Permanent		Permanent part-time		Temporary		Total	
	2020	2019	2020	2019	2020	2019	2020	2019
Men	6,807	6,832	0	0	0	0	6,807	6,832
Women	8,610	8,662	0	1	0	0	8,610	8,663
Total	15,417	15,494	0	1	0	0	15,417	15,495

Age	Average headcount							
	Permanent		Permanent part-time		Temporary		Total	
	2020	2019	2020	2019	2020	2019	2020	2019
Under 30	122	134	0	0	0	0	122	134
30 to 50	10,133	10,916	0	1	0	0	10,133	10,917
Over 50	5,162	4,444	0	0	0	0	5,162	4,444
Total	15,417	15,494	0	1	0	0	15,417	15,495

Professional category	Average headcount							
	Permanent		Permanent part-time		Temporary		Total	
	2020	2019	2020	2019	2020	2019	2020	2019
Executive directors	3	3	0	0	0	0	3	3
Management Committee	9	9	0	0	0	0	9	9
Level I to Level IV	3,491	3,437	0	0	0	0	3,491	3,437
Level V to Level VII	7,087	6,408	0	0	0	0	7,087	6,408
Level VIII to Level XIV	4,821	5,633	0	1	0	0	4,821	5,634
Other	6	4	0	0	0	0	6	4
Total	15,417	15,494	0	1	0	0	15,417	15,495

Number of hires by gender, age and professional category (figures at 31 December)

Gender	Hires							
	Permanent		Permanent part-time		Temporary		Total	
	2020	2019	2020	2019	2020	2019	2020	2019
Men	28	146	0	0	0	0	28	146
Women	15	116	0	0	0	0	15	116
Total	43	262	0	0	0	0	43	262
Percentage	100%	100.0%	0.0%	0.0%	0.0%	0.0%	100.0%	100.0%

Age	Hires							
	Permanent		Permanent part-time		Temporary		Total	
	2020	2019	2020	2019	2020	2019	2020	2019
Under 30	14	132	0	0	0	0	14	132
30 to 50	29	128	0	0	0	0	29	128
Over 50	0	2	0	0	0	0	0	2
Total	43	262	0	0	0	0	43	262
Percentage	100.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%

Professional category	Hires							
	Permanent		Permanent part-time		Temporary		Total	
	2020	2019	2020	2019	2020	2019	2020	2019
Executive directors	0	0	0	0	0	0	0	0
Level I to Level IV	1	7	0	0	0	0	1	7
Level V to Level VII	0	10	0	0	0	0	0	10
Level VIII to Level XIV	40	245	0	0	0	0	40	245
Other	2	4	0	0	0	0	2	4
Total	43	262	0	0	0	0	43	262
Percentage	100.0%	100.0%	0.0%	0.0%	0.0%	0.0%	100.0%	100.0%

Number of dismissals by gender, age and professional category

Gender	Type of dismissal					
	Disciplinary		Objective and other		Collective redundancy	
	2020	2019	2020	2019	2020	2019
Men	5	20	16	19	0	0
Women	7	10	23	18	0	0
Total	12	30	39	37	0	0

Age	Type of dismissal					
	Disciplinary		Objective and other		Collective redundancy	
	2020	2019	2020	2019	2020	2019
Under 30	1	0	0	0	0	0
30 to 50	8	21	22	19	0	0
Over 50	3	9	17	18	0	0
Total	12	30	39	37	0	0

Professional category	Type of dismissal					
	Disciplinary		Objective and other		Collective redundancy	
	2020	2019	2020	2019	2020	2019
Level I to Level IV	2	6	10	13	0	0
Level V to Level VII	7	12	9	7	0	0
Level VIII to Level XIV	3	12	20	17	0	0
Other	0	0	0	0	0	0
Total	12	30	39	37	0	0

2020 TRAINING PLAN

In 2020 more than 1.2 million hours of training were clocked up, of which 88% were digital and 12% in person. Due to the healthcare crisis, from the start of March all scheduled and foreseen in-person training was cancelled and changed to webinar formats, allowing participants to connect simultaneously from their computers.

	2020	2019
Annual investment in training (EUR million)	3.67	6.15
No. of employees to have received training	15,217	15,577
No. of training initiatives completed	1,060	1,135
Online training as % of total training hours	88.7%	77%

Average number of training hours

	2020	2019
No. of training hours per employee	82.6	86
No. of training hours delivered to men	541,114	607,725
No. of training hours delivered to women	747,793	774,894
No. of training hours delivered to senior executives ¹	2,849	5,773
No. of training hours delivered to middle managers ¹	333,735	383,708
No. of training hours delivered to other employees ¹	952,323	993,138

1. The breakdown of the hours of training by professional category is based on functional criteria, as the categories set out in the Collective Bargaining Agreement for Savings Banks and Savings Financial Institutions for 2019-2023, which governs staff of Bankia, S.A., no longer apply to the Bankia Group.

Customer advisory services and management

A hugely important area of training in 2020 has been that related to advisory services and marketing. On this front, the programme for advice on investment funds has been expanded to include 5,000 professionals in the branch network.

Training in the commercial management of micro-companies and self-employed workers has been increased as part of a plan aimed at over 500 branch managers, and a new phase of the programme has been launched to help improve key skills of business account managers.

This year also saw the launch of a new edition of the point-of-contact Customer Experience Certification, with over 100 participants. This certification comprises dual accreditation; an external academic title and an internal practical test, allowing successful participants to transfer the lessons learned to the actual management of our customers.

Regulatory training

Owing to the regulatory requirements that mean professionals in financial institutions must be highly qualified in financial advisory services and mortgage management, the entity has continued to implement a raft of training plans which account for a massive portion of the training hours delivered in 2020.

Consequently:

- 485 employees took the Financial Advisory Expert certification exams during the year, having previously completed the training process. Within the certification programme,
- 11,400 professionals have taken part in training sessions for the MiFID II Recertification Programme, lasting 30 hours.
- A total of 6,200 employees have been certified in the Real Estate Credit Expert training cycle, which lasts 54 hours and includes an external certification exam, while a further 4,300 have started the training process.
- The Anti-Money Laundering and Counter Financing of Terrorism guidelines have been enhanced through consolidation of the knowledge required to prevent such situations in the business.

Digital training and new ways of working

Bankia has continued to deliver digital initiatives to foster the bank's Digital Culture. Specifically, a further 1,449 branch managers completed the "How to be a digital salesperson" training. This training showcased the practical aspects of the digital transformation at Bankia and how to support customers in the use of digital channels.

The Digital Talent Programme has continued for the bank's central services personnel. This programme enhances their knowledge in specialised areas of the digital world, focusing on practical applications in the financial sector.

The implementation of new ways of working under the agile methodology has been supported by a specific training plan for all employees participating in agile-based projects.

This comprised three modules:

- Core module: providing a general overview to show them the main features and benefits of agile methodologies as a means of developing new ways of working.
- Specialised module: this technical training module is to discover and explore the main drivers and pillars for working on agile projects.
- Certification module: advanced training process that ends with a Scrum Master certification exam, allowing the user to perform that role in agile squads.

Environmental Risk Management

The training plan to build ESG (environment, social and corporate governance) criteria into business decisions has been very important in 2020. This plan is aimed at a group of 200 professionals in central services.

This training process was geared towards the analysis, understanding and study of various assessment methods, the sources of information and instruments, the difficulty of integrating ESG criteria in investment and financing decisions, the opportunities and limits of measurement, the different solutions to achieve such integration, and the impacts on the risk/return binomial.

More than 50 of the professionals have applied for international ESG certification, which is of huge importance in generating external recognition for investment decisions aligned with sustainable finance.

Specialised training for central services

Specific training and learning plans were also delivered for the people attached to central services departments and units.

These training plans help to cover the technical and regulatory knowledge needs of each group in the entity.

WORK-LIFE BALANCE AND MEASURES TO ENCOURAGE SHARING OF RESPONSIBILITIES BETWEEN BOTH PARENTS

Annual working hours are set out in the Collective Bargaining Agreement, while internal labour agreements contain working hours by group. Annual working hours amount to 1,650 hours of work plus 30 hours of training. Generally speaking, timetables between 1 October and 30 April are 8 a.m. to 3 p.m. on Mondays, Tuesdays Wednesdays and Fridays, and 8 a.m. to 2.30 p.m. and 4 p.m. to 7 p.m. on Thursdays; and between 1 May and 30 September they are 8 a.m. to 3 p.m. from Monday to Friday.

Bankia also has special timetables, agreed through collective bargaining agreements signed with worker representatives, for certain professional functions in specific departments and groups, which may under no circumstances exceed the above total hours. Likewise, Bankia has special timetables for certain offices (e.g. branches in shopping centres, the Torre Bankia branch, recovery centres, digital sales, agile and ofibus branches), the Directorate of Operational Markets Support and the Directorate of the Markets System in central services. It also offers flexible timetables for individual portfolio managers and private banking wealth managers, business account managers, product managers and managers in the Real Estate Financial Directorate (DFI), digital financial advisors and central services directorates.

All Bankia employees receive 25 days of paid holiday leave (27 days in the Canary Islands), two days for public holidays and two personal days. Moreover, Bankia gives individuals additional leave for loyalty, length of service or tenure, as a trade-off for special timetables (e.g. four additional days for agile branch personnel, three for branches in shopping centres, three for recovery centres. etc.) or MiFID and Real Estate Credit Law training.

Beyond the regulatory provisions in place to help ensure a healthy work-life balance among employees, Bankia has enabled a broad range of measures to improve the work-life balance and the sharing and balance of family responsibilities between parents.

Specifically, Bankia employees may apply for the following types of leave of absence and/or similar measures:

- 15 calendar days per year for hospitalisation of a child under 14 years of age. If this situation occurs during the maternity or paternity leave, the employee may take these days immediately after that leave ends.
- Reduction in working hours to care for children under the age of 12 or a person with a disability and without paid work, from 1/8 to 1/2 of working hours. This 1/8 reduction may be accumulated in days. In these situations, the employee may ask the bank not to consider the wage reduction due to the reduction in working hours when calculating that person's financial support, with Bankia undertaking to assess and study this on a case-by-case basis.
- Extension of paternity or other leave other than that pertaining to the biological mother by up to 20 calendar days,
- without interruption, for the birth of a child with a disability equal to or exceeding 33%.
- In cases of births, adoptions or fostering of a child with a disability of 65% or more, both parents will be entitled to 30 calendar days of leave during the first 48 months of the child's life, starting from the date of birth or the date of the adoption or foster care ruling, or from the declaration of disability.
- Preferential treatment of transfer requests received from workers with children who have a disability of 33% or greater.
- Increase of 20% in the educational aid for disabled children aged under 23, and 10% increase for disabled children aged 23 years and over.

- Bankia collaborates with the Adecco Foundation to give access to the Family Plan, which is aimed at Bankia employees who have children with a disability (equal to or greater than 33%). This programme offers them advice, guidance and a personalised support plan to achieve the social and labour market integration of the child.
- During the first year of childcare leave, the employee may ask their employer to suspend payment of contributions for certain financial aid and maintain contributions to the pension plan, as well as childcare support and child education support.
- Employees have access to the Virtual Classroom and training programmes while on leave for child or family care.
- Three business days for accident or serious illness, hospitalisation or surgery without hospitalisation that requires recovery at home affecting family members up to the first degree of consanguinity or affinity.

When recovery at home is required, this leave may be taken on alternate days. This leave is extended by a further two business days if travel is required.

- Two business days for accident or serious illness, hospitalisation or surgery without hospitalisation that requires recovery at home affecting family members up to the second degree of consanguinity or affinity.

When recovery at home is required, this leave may be taken on alternate days. This leave is extended by a further two business days if travel is required.

- Three business days for the death of any family member up to the first degree of consanguinity or affinity. When recovery at home is required, this leave may be taken on alternate days. This leave is extended by a further two business days if travel is required.
- Two business days for death of a family member up to the second degree of consanguinity or affinity. When recovery at home is required, this leave may be taken on alternate days. This leave is extended by a further two business days if travel is required.
- Paid leave of 30 hours per year to accompany a child, spouse, mother or father, and registered domestic partner to medical appointments, medical treatments involving radiation, chemotherapy, dialysis or similar treatments and rehabilitation.
- Advance on holiday entitlement for serious illness of a family member. In the event of serious illness of family members up to the first degree of consanguinity or affinity, the employee may take up to five days of their holiday leave for the following year.
- Leave for infant feeding: absence from work lasting one hour (which may be split into two fractions), or reduction in daily working hours of half an hour, or otherwise 15 calendar days off work to be taken within the first 12 months of life of the child. This leave also applies in cases of adoption or foster care.
- Leave for infant feeding in the case of premature childbirths and children hospitalised at birth: daily absence of one hour or reduction in working hours of up to two hours for a maximum of one month, with no reduction in salary.
- Leave to feed infants in multiple births: the leave or reduction in working hours may be replaced with paid leave of 20 calendar days to be taken immediately after the maternity leave ends, plus a further 10 business days to be taken over the first 12 months of life of the child. For the birth of three or more children, this leave is extended to 25 calendar days following on from the end of the maternity leave, and 15 business days to be taken over the first 12 months of life of the child, which may not follow directly on from the first leave. This leave also applies in cases of multiple adoption or foster care.

- Subsidy for birth and care of children for both parents: Bankia makes up the difference to increase the subsidy for the birth and care of children covered by Social Security to 100% of the worker's fixed remuneration during the entire period of suspension of contract due to leave for the birth, adoption or fostering of a child.
- Leave to attend prenatal classes or techniques for the required length of time when they must be during working hours. This leave may be taken by both parents.
- Paid leave up to seven hours per year for school matters.
- Paid leave up to three months for the accredited need for distanced separation as a result of gender-based violence.
- Solidarity support for victims of harassment and gender violence, who have priority when applying for transfers, working hour changes and leaves of absence. In addition, during the entire period of leave of absence or suspension of contract due to harassment or gender violence, the worker will remain entitled to the special financial aid stipulated for Bankia employees.
- Unpaid leave of one week to one month to cover family needs, overseas adoption, or assisted reproduction techniques.
- Unpaid leave of one week to six months in the event of a serious accident or illness affecting family members up to the first degree of consanguinity or affinity.
- Unpaid leave of one week to six months in the event of the hospitalisation or palliative care of family members up to the first degree of consanguinity or affinity.
- Unpaid leave of one month to six months to complete higher education qualifications or doctorates.
- Unpaid leave of up to 10 days in the event of serious illness of the spouse or registered domestic partner and family members up to the first degree of consanguinity or affinity, even if unused holiday leave is available.
- Leave of absence to perform services on behalf of a renowned charitable organisation with a right to reinstatement on conclusion.
- In the event of temporary incapacity, the bank makes up the difference to ensure that the affected worker receives 100% of his or her fixed annual remuneration during the first 12 months of their time off work, and 87.5% of their total annual remuneration from months 12 to 18.
- Bankia personnel have a healthcare insurance policy paid for in full by the bank. Employees can include their spouse, registered domestic partner and children under 26 years old as beneficiaries in such policy, with Bankia paying 30% of the annual premium.
- Flexible work start and end times for certain employee segments.
- Remote working is acknowledged as an innovative way of organising and executing work outside of the company's facilities.

Remote working is voluntary for both employee and company, and it may be revoked by either party. The bank provides employees who work remotely with the resources, equipment and tools necessary to carry out their professional activity.

To cover any costs incurred as a result of working remotely, employees will receive up to EUR 55 per month in proportion to the percentage of working hours agreed to be performed remotely.

- The right to digital disconnection is guaranteed for all workers, whether they work on site or through new ways of working, and the exercise of this right will not result in any disciplinary action or have any negative effects whatsoever on promotions, assessments and evaluations.

At Bankia, the right to digital disconnection outside working hours is conceptualised as a limit on the use of communication technologies to guarantee that outside the legal or conventional working hours, all employees' breaks from work, leaves and holidays are respected. Various measures have been put in place to guarantee protection of this right, including; the right of employees to not look at digital devices outside working hours and during time off for leave, holidays or reductions in working hours. Generally speaking, no telephone calls, emails, or messages of any kind will be made or sent after 7 p.m. Monday to Thursday and 3 p.m. on Fridays, except with just or urgent cause.

On this front, on 15 July 2020 Bankia signed a Labour Agreement on digital disconnection with almost all union representatives. Bankia has made available to all bank employees, via the intranet, a series of basic principles to help them better organise their work and which are essentially a set of good practices regarding the effective and efficient management of meetings, rational use of the corporate email and telephone service and teamwork.

These good practices are embodied in concrete proposals for action in three key areas:

1. Effective meetings: with tips on how to manage meetings and optimise the time spent on them, for example:
 - Meetings must not stretch beyond the working hours during the year established in the collective bargaining agreement and prevailing working hours in Bankia.
 - Meetings must not run beyond 7 p.m. Monday to Thursday or 3 p.m. on Fridays, with a recommendation that they last 45/60 minutes and never more than two hours.
 - The use of video conferences and calls is encouraged to avoid unnecessary travel.
2. Rational use of corporate email and telephone: recommendations that they be used rationally and responsibly, for example:
 - Restricted telephone contact, whether by email, WhatsApp, etc. after 7 p.m. Monday to Thursday and 3 p.m. on Fridays.
 - Any communication after such hours must not contain orders or demands that would require work outside ordinary working hours.
3. Teamwork: with advice on how to ensure better collaboration and teamwork.

Bankia also provides its employees with training and awareness-raising initiatives on the protection of and right to digital disconnection, and the reasonable and appropriate use of ITC. Bankia therefore offers its employees a whole host of useful recommendations to improve the working environment and achieve a work-life balance, and so that they and their co-workers can optimise their time.

Bankia has a service aimed at people who work at the bank, including their family members, called Bankia Facilita. Through this service, Bankia employees and their family members can enjoy a wide range of benefits and support services, many of which are free or available at lower-than-market prices, 24 hours a day, 365 days a year, anywhere in Spain.

Bankia Facilita was bolstered in 2020, having been launched in 2019, especially in respect of services that facilitate tasks in relation to COVID-19: medical and psychological guidance, telepharmacy, home deliveries and help, etc., which have seen a very favourable uptake by Bankia employees.

This year the entity shone a light on emotional well-being, increasing the number of hours of psychological care, as well as capsule webinars. Thanks to these initiatives, Bankia is generating a culture of internal wellness and is committed to shared responsibility between company and employee, as we continue to work towards their physical and emotional well-being.

Bankia has maintained its SRC badge as a “Socially Responsible Company with its Staff”, awarded by the foundations Fundación Diversidad and Fundación Alares in recognition of the bank’s efforts in developing Human Resources policies and the services the bank offers all employees and their family members to promote a work-life balance, equal opportunities and appropriate diversity management, and to prevent discrimination of any kind in the hiring process.

Furthermore, in 2020 Bankia was recognised as a “Healthy Company” by the Human Resources Observatory on account of, inter alia, the bank’s policies on work-life balance and diversity.

MEASURES TO INTEGRATE PEOPLE WITH DISABILITIES AND ENABLE ACCESS

All Bankia employees are given the technical and material resources needed to perform their jobs.

The bank’s exemption certificate awarded by the State Employment Service attached to the Spanish Ministry of Employment remains valid, showing that the bank complies with the “alternative measures” provided for in article 2.1, sections a) and b) of Royal Decree 364/2005, of 8 April, governing exceptional alternative compliance with the reserve quota for employees with disabilities.

Bankia has devised a Family Plan as part of its pledge to reconcile the work and family life of people with disabilities. The plan is aimed at Bankia employees who have a disabled child (33% or more) and provides a fully customised programme to maximise their child’s development and enable their social and labour market integration. Workers with disabled children are also entitled to a 20% increase in educational support until the child reaches 23 years of age, and a 10% increase from 23 years of age upward.

Bankia is acutely aware of integration and accessibility for people with disabilities and therefore arranges the services of various special employment centres for the provision of different professional services every year.

Meanwhile, Bankia has material, technological and accessible devices in place at its branches and public support centres so that people with disabilities are fully able to access the bank’s services.

Employees with disabilities	2020	2019
Disability >=33% and <65% with reduced mobility	7	8
Disability >=33% and <65%	172	162
Disability >=65%	14	13
Total	193	183

HEALTH, SAFETY AND WELL-BEING.

The Health and Safety policy is approved by the Management Committee and the actions related to the policy are reviewed annually by the Deputy General Directorate for People and Culture. The scope of the occupational health and safety system includes all activities aimed at reducing or controlling occupational risks. These activities come under the annual preventive activity programming, which is approved and monitored by the State Health and Safety Committee.

	2020	2019
No. of employees trained in occupational health and safety	520	2,147

In 2020 the activities carried out within the occupational health and safety system in the Torre Bankia building have been certified under ISO Standard 45001:2018 “Occupational health and safety management systems”.

In 2020, for the second consecutive year, Bankia’s “Your well-being” programme, designed and deployed across the Group to generate a healthy company culture, operating under the premise of health as a lifestyle and endeavouring to change habits while treating the workplace as a health scenario, received the “Healthy Company” runners-up award in the Large Companies category at the international awards event staged by the Human Resources Observatory (ORH), with special recognition for our all-encompassing approach across the

entire organisation. This has allowed us to swiftly roll out measures in a coordinated fashion to address the conditions imposed as a result of the pandemic, deploying a strategy spearheaded by the COVID-19 Contingencies Management Committee, which has been involved in the design, implementation and monitoring of every action carried out, enabling us to be the first financial institution to obtain the “COVID-19 Safe Protocol” certification issued by Applus, an independent entity. This certification reflects Bankia’s commitment to the health and safety of its professionals and customers, embodied in the numerous organisational, technological and preventative measures implemented, and verified through ongoing reviews of COVID-19 risk assessments. The entity consulted with Health and Safety Delegates to establish a control plan and procedures on how to act in the event of detecting positive COVID-19 cases.

This year the entity detected the need to bolster the help available in terms of psychological guidance and emotional support provided by Bankia Facilita in collaboration with Fundación Alares, giving employees and their family members access to free sessions.

As such, we have continued our ongoing efforts to fine-tune the four priority lines of action for the development of our culture of complete well-being:

- COVID-19 Response Plan.
- Biopsychosocial Care.
- Remote Working: Ergonomics and Psychosocial Measures.
- Emotional Well-Being: Self-Awareness and Resilience.

Relevant health and safety indicators

	Men		Women		Total	
	2020	2019	2020	2019	2020	2019
Number of hours lost to Absenteeism ¹	243,687	263,755	592,451	644,970	836,138	908,725

1. The number of hours lost to absenteeism has been calculated based on the absent work days registered as a result of non-work related contingencies and work-related accidents, with those lost due to COVID-19 excluded from the calculation (total of 178,871 hours). These hours are obtained by multiplying the work days lost by the theoretical hours in an average work day.

	2020	2019
Absentee rate ¹	3.20%	3.53%
Work-related accident rate ²	0.10%	0.10%
No. of instances of paid sick leave for non-work related ill health ³	3,712	4,771

1. Non-work related contingencies and work-related accidents (excluding COVID-19)

2. Number of work-related accidents (excluding travel to and from work) as a percentage of the average workforce in the period.

3. Excluding COVID-19: 1,828.

2020 ¹	At work		Travelling to and from work		Total
Type of accident with paid sick leave	Women = 13	Men = 3	Women = 29	Men = 11	56
	16		40		
Frequency rate ²	Women = 0.54	Men = 0.13	-	-	0.67
	0.67		-		
Severity rate ³	Women = 0.0177	Men = 0.0048	-	-	0.0225
	0.0225		-		
Work-related ill health	Women = 0	Men = 0	-	-	
Work-related fatalities	Women = 0	Men = 0	Women = 0	Men = 0	0

1. Accident figures do not include relapses from previous years.

2. The number of work-related accidents is during working hours (excluding travel to and from work). When calculating hours worked, the effective working hours during which the workers in question were "exposed to the risk" of suffering a work-related accident are included. Hours not worked due to paid sick leave or other leave, holiday, absenteeism, and so on, are excluded from this calculation. Overtime also counts towards total hours worked. Hours lost due to accidents included in the calculation are deducted.

$$I_f = \frac{\text{No. of work-related accidents with medical leave} \times 10^5}{\text{No. of total hours effectively worked}}$$

The frequency rate breakdown for women/men is the number of work-related accidents resulting in medical leave for women/men divided by the total number of hours effectively worked for the entire workforce.

3. Lost work days are calculated as the calendar days (including public and personal holidays) between the medical leave start and end dates.

$$I_g = \frac{\text{No. of days lost due to work-related accidents} \times 10^3}{\text{No. of total hours effectively worked}}$$

The severity rate breakdown for women/men is the number of work days lost to work-related accidents resulting in medical leave for women/men divided by the total number of hours effectively worked for the entire workforce.

2019 ¹	At work		Travelling to and from work		Total
Type of accident with paid sick leave	Women = 15	Men = 1	Women = 51	Men = 13	80
	16		64		
Frequency rate ²	Women = 0.62	Men = 0.04	-	-	0.66
	0.66		-		
Severity rate ³	Women = 0.0166	Men = 0.0088	-	-	0.025
	0.025		-		
Work-related ill health	Women = 0	Men = 0	-	-	0
Work-related fatalities	Women = 0	Men = 0	Women = 0	Men = 1	1

1. Accident figures do not include relapses from previous years.

2. The number of work-related accidents is during working hours (excluding travel to and from work). When calculating hours worked, the effective working hours during which the workers in question were "exposed to the risk" of suffering a work-related accident are included. Hours not worked due to paid sick leave or other leave, holiday, absenteeism, and so on, are excluded from this calculation. Overtime also counts towards total hours worked. Hours lost due to accidents included in the calculation are deducted.

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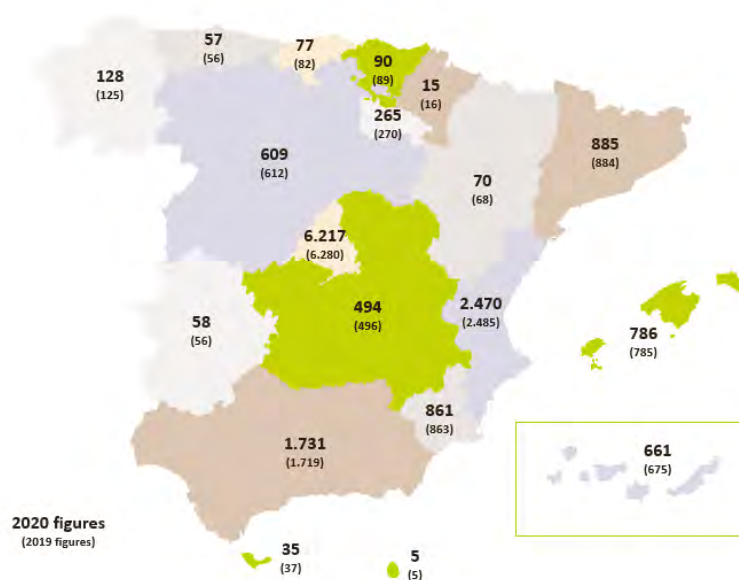
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OTHER PEOPLE INDICATORS

Workforce profile

Geographic distribution of Bankia employees in Spain



	2020	2019
Total number of people who work at Bankia S.A.	15,522	15,609
No. of people working in Spain	15,514	15,603
No. of people posted abroad (representative offices in Cuba, Shanghai and Casablanca)	8	6

Distribution by business and management function

	2020	2019
No. of business employees	13,229	13,355
No. of central services employees	2,293	2,254

	2020 ¹		2019 ¹	
	No.	%	No.	%
Employees with management functions (women)	1,669	43.24%	1,721	42.68%
Employees with management functions (men)	2,191	56.76%	2,311	57.32%

1. Includes heads of Central Services and managers and deputy managers of the commercial network.

Working conditions

	2020	2019
Percentage of workforce covered by a collective agreement	100%	100%
Percentage of professionals with a permanent contract	100%	100%
Percentage of professionals entitled to receive variable remuneration	100%	100%
No. of professionals working flexible hours	7,509	7,440
Percentage of employees represented on health and safety committees	100%	100%
No. of elected union representatives	477	477
No. of hours dedicated to union activity by affiliated employees	219,820	54,955

Employee benefits

	2020	2019
Percentage of professionals who receive a contribution from Bankia to the employee pension plan	99.97%	99.97%
No. of employees and family members (spouses or partners and children up to 25 years of age) covered by the employee health insurance policy	31,697	28,046
No. of employees with advances, loans and/or mortgages subject to subsidised interest rates during the year	13,177	13,357

	No. of people		Amount (EUR million)	
	2020	2019	2020	2019
No. of professionals receiving study grants	1,042	406	0.44	0.31
No. of professionals who receive educational support for disabled children and children who sleep away from home	930	914	0.90	0.97
No. of professionals who receive grants for children's schooling	10,763	10,804	10.40	10.61

	2020	2019
No. of professionals on leave of absence for personal reasons	75	85
No. of professionals who have taken maternity leave	302	387
No. of professionals who have taken paternity leave	240	192

Unwanted external turnover

	2020	2019
Unwanted external turnover rate	0.73	0.83%

By gender	2020	2019
Percentage of unwanted external turnover: men	0.35	0.51%
Percentage of unwanted external turnover: women	0.38	0.32%

By age	2020	2019
Percentage of unwanted external turnover: under 30 years old	0.04	0.08%
Percentage of unwanted external turnover: 30 to 50 years old	0.41	0.47%
Percentage of unwanted external turnover: over 50 years old	0.28	0.28%

f) Responsible purchasing

Policy and commitment

In 2020 Bankia's Board of Directors approved a new Purchasing Policy, the purpose of which is to promote business relationships based on a professional attitude and integrity, collaborate with suppliers who share Bankia's commitments and values, and reap mutual benefits sustainably. The Policy is rooted in the following principles:

Professional attitude and continuous improvement: by complying with Spanish and international Purchasing standards, which are guided by best business practices.

Planning and efficiency: to plan purchasing activities and strive for efficiency in procurement.

Ethics and transparency: to ensure that the supplier selection process is transparent and independent, addressing any conflicts of interest and overseeing compliance with prevailing legislation in all areas of endeavour.

Equal opportunity: to ensure competition among suppliers for a single purchase request, to encourage the distribution of business among different suppliers, and to provide objective decision-making.

Dialogue and cooperation: to maintain and promote dialogue and close, ongoing communication and to ensure that suppliers are aware of our commitment to ESG.

Commitment and promotion: to evaluate supplier performance and risk and promote the engagement of suppliers who apply ESG best practices and work to extend them throughout the value chain.

Bankia's Purchasing function contributes value to the organisation, aligning its Purchasing objectives with its business strategy while responsibly and sustainably supplying the goods and services needed, applying centralised management under unified criteria, thus minimising risk and taking on a leadership role within the organisation.

The Purchasing Policy applies to all Bankia Group companies and employees, especially those directly involved in the procurement of goods and services.

Aside from its own Code of Ethics and Conduct, Bankia has a set of rules of conduct specifically for the purchasing function, based on the rules of the International Federation of Purchasing and Supply Management.

These rules are rooted in the principles and values of loyalty and honesty, objective decision-making, transparency and equal opportunities, confidentiality, integrity, independent relations and corporate social responsibility, among others.

Responsible purchasing

To comply with the Purchasing Policy, Bankia has in place a supplier approval process that assesses ethical, social and environmental performance, giving priority to suppliers that meet the highest standards and practices for responsible management.

We require our suppliers to comply with the laws and regulations prevailing wherever the bank operates. We place value on suppliers' alignment with the principles of the UN Global Compact, the Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organization (ILO).

We therefore give a higher score to suppliers who show a genuine commitment to their employees, quality, the environment and human rights. Meanwhile, we avoid dealing with suppliers who break the law or fail to meet their tax, employment, environmental or employee obligations.

The approval process assesses economic, social and environmental risks. Suppliers must achieve a satisfactory economic risk score and furnish all the information required of them.

Supplier profile

Approved suppliers

	2020	2019
Total number of active suppliers	2,074	2,132
Total number of assessed and approved suppliers	932	896
No. of active approved suppliers in Spain (local scope)	1,873	1,927
No. of active approved suppliers outside Spain (outside local scope)	201	205
No. of new suppliers incorporated	169	203
No. of certified suppliers approved under CSR criteria	589	571
Percentage of new suppliers approved under CSR criteria	26.03%	23.65%
No. of suppliers carrying ESG risk	36	26

SME suppliers

	2020	2019
Total number of active suppliers that are SMEs	1,687	1,569
No. of active SME suppliers in the bank's main areas of activity	1,425	1,310
No. of active SME suppliers outside the bank's main areas of activity (in 2020, 167 domestic and 95 foreign)	262	259

Active domestic suppliers by sector

	2020	2019
No. of active suppliers in the legal sector	128	148
No. of active suppliers in the real estate/construction sector	189	142
No. of active suppliers in the general services sector	193	211
No. of active suppliers in the associations, groupings and NGO sector	137	146
No. of active suppliers in the IT sector	282	279
No. of active suppliers in the consulting, auditing and advisory services sector	203	188
No. of approved suppliers active in other sectors (advertising/marketing, financial and banking, financial reporting services, etc.)	942	1,018

Relationship model

As part of its ongoing transformation, Bankia is developing a digital supplier relationship model to promote transparency, fairness, equal opportunities and active listening.

Bankia's Supplier Portal is a collaborative and easy-to-use online environment through which suppliers can securely submit all the information required by Bankia during the supplier approval process. In the interests of transparency, suppliers are able to view their score or rating, which is automatically awarded based on the information they provide. Suppliers can also use this portal to take part in various negotiation processes, ensuring equal opportunity during the bidding process.

Besides this being a useful platform for approval and negotiation, suppliers can also sign contracts online as part of the purchasing process.

Bankia also provides its suppliers with various tools to gauge what they think about their relationship with the bank. Suppliers can use the confidential Whistleblowing Channel (managed by an independent third party) to report suspected breaches of the bank's Code of Ethics and Conduct.

Suppliers can also approach the Supplier Service Department to file grievances and complaints, lodge claims or make suggestions in relation to the payment of invoices and the provision of contractually agreed services, and voice their disagreement with supplier selection processes.

	2020	2019
Total invoicing (total purchasing volume) (EUR million)	812.19	828.79
Invoicing with domestic suppliers (local scope) (EUR million)	763.70	792.74
Invoicing with foreign suppliers (outside local scope) (EUR million)	38.49	36.05
Average supplier payment period	9.39 days	9.44 days
Percentage of invoices paid within the maximum legal period (30 days)	98.62%	98.66%

Meanwhile, satisfaction surveys, which are summarised in the Supplier Perception Study, are used to gather the opinions of both suppliers that have been awarded contracts and those that have not, assessing aspects such as friendliness, the negotiation process, flexibility of procurement and the fulfilment of payment obligations.

	2020	2019
Supplier satisfaction rate (with a score above 7 in the satisfaction survey)	88.0%	81.6%

Recognition of the Purchasing Management System

In 2020, Bankia renewed its certification under UNE 15896, on value added purchasing management, illustrating the excellence of Bankia's procurement management system and demonstrating that it is in line with best business practices at European level.

Bankia was the first financial institution to obtain this supranational certification, which sets a standard for continuous improvement, minimises risks and ensures that sustainability is taken into account in procurement management.

Relationship with suppliers during COVID-19

During the crisis triggered by COVID-19, Bankia continued to pay its suppliers on time, irrespective of whether they were able to provide the service in its entirety, to help ensure their survival and protect jobs, the only requirement being to maintain the working conditions of their employees.

To this end, Bankia instructed those tasked with processing and approving supplier invoices to speed up the payments for which they were responsible to ensure that our suppliers received their payments as soon as possible.

Furthermore, other actions were undertaken to help our suppliers during the crisis triggered by the pandemic:

- Change in procedures for certain services affected by COVID-19 to enable our suppliers to work from home.
- Review of inventory of essential services and critical activities.
- For critical suppliers, compilation and validation of the business continuity plans.
- Preparation of a map of suppliers of pandemic-related products or services to initiate the supplier approval process.

g) Transparency of information

Bankia is acutely aware that the complex landscape in which it operates requires solutions, initiatives and commitments that must be addressed through joint dialogue with its various stakeholders.

In this task, transparency is a key requirement in enabling the relationship with stakeholders to develop and take shape on an equal footing. For Bankia, transparency is a permanent commitment and attitude, which ultimately serves to provide reliable, truthful, clear and up-to-date information that ensures accountability and

shows that the bank practises what it preaches. This has the effect of building solid and lasting relationships of trust with stakeholders.

This transparency requires the bank to maintain constant dialogue tailored to each stakeholder so that the parties can find solutions suited to their mutual needs.

Bankia faces its challenges with the full support of its stakeholders and builds relationships of trust by relying on dialogue as a proactive mechanism to help improve strategy and operational excellence, undertake innovative initiatives and strengthen alliances.

To this end, Bankia has different communication channels in place for interacting with stakeholders:



- Information and communication policy

As part of its overarching mandate to establish Bankia's general policies and strategies, the Board of Directors has approved a Policy on Information, Communication and Relationships with shareholders, institutional investors and proxy advisors which forms part of Bankia's System of Corporate Governance.

The basic objective is to promote an ongoing conversation with each of the entity's stakeholder categories, particularly shareholders, institutional investors and proxy advisors, with a view to creating solid, stable relationships built on trust and promoting transparency in the interest of society, as stipulated in Recommendation 4 of the new Good Governance Code of listed companies approved by the Spanish National Securities Market Commission (CNMV), which indicates the need for entities to define and promote "a policy for communication and contacts with shareholders and institutional investors as part of their commitment to society, as well as with proxy advisors which complies with all market abuse rules and affords equal treatment for shareholders that are in the same position".

The principles governing this policy are as follows:

- Reporting transparency: ensuring the transparency, truthfulness, immediacy and symmetry of information disclosures.
- Ongoing information and dialogue: promoting information on an ongoing basis whenever convenient (and not just during the AGM); facilitating access to the most effective communication channels and mechanisms so that shareholders, investors, proxy advisors and other stakeholders are at all times kept abreast of any proposals that might be made in relation to the management of the entity, pursuant to prevailing legislation and Bankia's System of Corporate Governance.

- Equal treatment and non-discrimination: protecting the legitimate rights and interests of all shareholders and equal terms of recognition and exercise under equal circumstances for those who are not subject to anti-trust or conflict of interest.
- Commitment and integrity in the dissemination, communication and management of corporate information: to maximise economic and financial value creation for shareholders, investors and other stakeholders, and ensure that Bankia's market information and communication mechanisms are aligned with the interests of its stakeholders.
- Innovation, sustainability and development of new technologies: development of reporting instruments that leverage the new technologies, keeping the bank at the forefront in the use of new communications channels.
- Legal compliance and compliance with the System of Corporate Governance: compliance with legal provisions and the entity's System of Corporate Governance, fomenting cooperation and transparency with the competent authorities, regulatory bodies and government.

These principles apply to Bankia's information disclosures, its direct communications with shareholders and institutional investors and any other information or communication by the entity in the context of its relationships with the markets and other stakeholders such as financial intermediaries, Bankia share management companies and depositories, financial analysts, regulatory and supervisory bodies, proxy advisors, rating agencies, the media, etc.

When disclosing information and communicating with stakeholders, Bankia is especially mindful of the rules on the treatment of insider information and the relevant information included in both the applicable legislation and the entity's rules regarding shareholders and stock market reports, as provided in the Code of Ethics and Conduct, the Internal Rules of Conduct for Securities Markets activities and Bankia's Board of Directors Regulations.

5. CUSTOMER FOCUS

a) Responsible marketing

Customers are Bankia's main asset and forging lasting relationships with them based on mutual trust is of paramount importance to the bank.

With this in mind, not only does Bankia comply with current law and regulations on the marketing of banking products and the supervision and control of regulatory bodies, it also seeks to strengthen this bond of trust with customers through the excellent commercial demeanour and conduct of all bank employees. This approach is embodied in Bankia's internal regulations and is compulsory for all people who make up the bank.

This commitment to responsibility with customers is enshrined in Bankia's Code of Ethics and Conduct, in its Responsible Management Policy and in its Code of Responsible Marketing, which explains how these behaviours should manifest in a tangible way in the bank's day-to-day operations. The bank must strive to offer and market products and services that are suitable for each customer profile and tailored to their needs, with customer satisfaction remaining a priority indicator and a product of responsible action. More than 40,000 surveys are performed each year to gather detailed information on the marketing process and customer feedback, implementing immediate action when negative feedback is detected.

CUSTOMER-CENTRIC APPROACH

Customer satisfaction is one of the strategic pillars of the 2018-2020 Strategic Plan. Accordingly, Bankia puts great effort into learning customers' opinions and implements measures to improve their opinion and loyalty and ensure positive word of mouth.

The customer observatory was launched in 2020 to focus on the real needs of customers as a result of the pandemic. Over 10,000 surveys were performed throughout the year to identify what customers expect from

Bankia and how the entity can help them in this setting. Retail customers, self-employed workers, micro-companies and SMEs were all surveyed.

The entity also undertook the project to upgrade the Customer Voice model. Through in-depth qualitative research with customers and employees, this project enabled Bankia to design a new information gathering system with a special focus on moments of truth for the customer.

At the same time, as in prior years, the entity surveyed customers to gather their feedback and opinions so as to improve their Bankia experience in all the channels they use with the entity. This information also allows the bank to launch unique initiatives aimed at each customer segment: young people, high-income customers, private banking, SMEs, micro-enterprises, etc.

Making technology part of the relationship with customers and bringing it into play to gauge their opinions is an immensely useful tool in ensuring agile and immediate communication with them. Using mobile phones to provide and store evaluations and opinions given by customers allows for almost entirely online management of any incidents that may arise, in that the bank is able to immediately contact a customer who has given a low score. This prompt management of alerts has led to a significant increase in positive evaluations from customers, who appreciate the bank's proactive management and willingness to listen.

Digitalisation permeates all areas of the organisation and all relevant quality information is available in the Digital Quality Scorecard, which is enriched every year with new studies and reports. The information that can be viewed in this scorecard is both quantitative and qualitative, so that we can analyse not only what customers say but, above all, how they say it.

In 2020, Bankia continued to improve its performance in the mystery shopping ranking, outperforming all its main competitors. The results showcase the high standards of quality offered by Bankia (source: EQUOS STIGA 2020).

	2020	2019
Retail customer satisfaction index	88.3%	90.3%
Business customer satisfaction index	94.4%	94.7%
Conecta con tu Experto (Connect with your Expert) customer satisfaction index	83.3%	92.2%
No. of customers taking part considering all surveys ¹	189,400	284,288
No. of after-sales product surveys ¹	36,800	61,169
Overall mystery shopping rating	8.49	8.28

¹ The surveys were put on hold before the end of Q1 2020 and during the entirety of Q2 2020 due to the pandemic, thus affecting the total number of surveys performed.

CUSTOMER EXPERIENCE AND QUALITY OF RELATIONS

Bankia has made customer experience an organisational strength, which distinguishes it as an entity committed to customers and their needs, guaranteeing satisfactory experiences with customers in all channels.

In 2020 Bankia was recognised in the 7th edition of the DEC Awards as the Spanish company with the “Best Customer Experience Strategy” for its commitment and efforts in this area, specifically the project to create its own methodology for the implementation of a feedback-based customer experience model, connected to the business and defined according to the bank's brand identity through its values. This category rewards the design and execution of global projects in which customer experience drives the business and constitutes a competitive advantage.

This accolade adds to that obtained by Bankia in the 2017 DEC Awards for “Best Employee Initiative”. As such, our entity is the first company to receive two DEC Awards in different categories in the history of the awards.

In 2020 the main focal points in this domain were:

Customer Experience Certification Programme

For the fourth year running, Bankia has been a pioneer among Spanish banks through the mixed certification of its commercial network, combining internal and academic accreditation.

Bankia's Customer Experience Certification is an annual challenge with different monthly milestones for the entire commercial network, which links customer experience to the business through a commercial model based on two pillars: commercial intensity and customer perception. These key components have allowed Bankia to achieve all-time high customer satisfaction and they have been worked on non-stop during the difficult climate for customer management in the commercial network caused by the pandemic.

For yet another year, this internal certification has been supported with academic training in customer experience management provided by the Lasalle IGS Business School, blending theory and on-the-job learning with a clear focus on innovation, and acting as an ideas and projects lab for the bank. On top of the more than 150 managers certified in previous years, a further 50 branch managers started this training (online) in 2020.

The most relevant projects in 2020 revolved around the following areas:

- Digital impulse: digital support in branches, commercial management via videocalls, and definition of digital journeys.
- "Por Ser Tú" (As it's you) programme: developing the new Customer Relations Plan.
- COVID-19 climate: generation of conversations with customers during lockdown, especially regarding financial solutions (payment holidays).
- Customer Observatory: early detection of social trends in consumer spending and finance.

Systematic sales approach

After focusing on the development and implementation of a diagnostic and work model to ensure standardised commercial activity and the development and improvement of capabilities, in 2020 the entity has concentrated on adapting to the new "Por Ser Tú" Relationship Model and expanding the systematic approach to the specialised areas of business activity, insurance and recoveries.

The main projects carried out, in tandem with the Customer Experience and Quality of Relations Department, have centred on:

- Rolling out a remote working model, providing guidelines for working during the pandemic, and making proactive commercial management more robust and efficient.
- Developing a Digital Systematic Sales Approach to improve, from physical branches, the digital experience of customers and their capacity to resolve issues on their own.
- Developing a model to improve commercial skills in area and branch management, focusing on achieving excellence in activities and conversion, in compliance with the Bankia relationships model at all times.

SALES RESEARCH

In keeping with the commitment to put customers at the heart of the business, an online community called Bankia Experience Lab has been developed to receive active feedback from customers, generating important value propositions for the co-creation of new products and services. In this manner, Bankia involves this stakeholder in the pre-design, design, post-design and marketing process.

It also allows Bankia to identify, explore and delve into customer experiences with the bank. Thanks to the collaboration with customers contributing to the community, in 2020 Bankia obtained and applied significant findings and feedback, which are directly reflected in the customer experience or launch of new products and services.

An example worth highlighting is the launch of Bankia's green mortgage. This is a loan to finance purchases of sustainable housing with high energy ratings (A or B), with lower fees and no loyalty requirements. The latter aspect was considered a differential factor by customers participating in one of the community's activities and was incorporated into the product design process.

Moreover, the Bankia Experience Lab has provided customer feedback on the different digital channels, regarding design, user-friendliness, functionalities, uses, content and security, testing new digital processes and/or functional improvements in existing processes.

All the lessons learned have been applied in the design and launch of the new Bankia App, which is placed third in the Smartme Analytics ranking of banking apps.

BUSINESS INTELLIGENCE

In 2020 Bankia has continued to improve its analytical capabilities, allowing the bank to understand each customer and further personalise the products and services they need at the precise time they need them.

The entity has honed customer segmentation so that it can detect the particular circumstances of each customer and tailor its products and services accordingly based on their actual social and economic circumstances.

The bank is currently working on the design of customer journeys, which consists of developing commercial processes to support the customer from the moment a commercial need is identified until the product or service is arranged. This involves a multi-channel commercial relationship, tailoring the products and services to the customer's choice of channel with the best possible customer experience. Bankia plans to have more than 50 journeys up and running by 2021, focused on the products that provide the most value to customers and the bank.

To this end, it applies agile methodologies to achieve an adequate time-to-market for products and services with excellent results, i.e. satisfying the customer's needs at the opportune time, which makes Bankia a pioneer in applying analytics to commercial activity.

The entity has also continued to detect events, such as abandoned processes of arranging products online or credit card limits being exceeded, that will allow it to respond commercially and financially in real time (or in a very short period of time) to any needs customers may have. More than 150 events have been established, which will be maintained in 2021, and the bank's significant analytical efforts mean that 100% of its customers receive a better offer promptly.

Progress continues to be made in developing activities to provide a 360° vision of the customer, improving the customer profiling. This vision enables the bank to meet customer needs more effectively in all channels and further improve the customer experience in their interactions.

Alongside all these activities, descriptive analytics are being enhanced to build early warnings into the scorecards, enabling commercial action to be refocused. A/B testing techniques are being applied in commercial actions to rapidly adapt to improve customer experience, recommendation responses and, as a result, conversion rates.

On the commercial relations front, progress has been made to improve relationships with customers showing increased loyalty to the bank, providing the most attractive offers on the market thanks to the analytics available that boost the identification of such customers.

CUSTOMER SERVICE

Bankia has a Customer Service Policy in place (approved by the Board of Directors), which is there to foster a healthy relationship with customers, maintain their trust and offer them appropriate levels of protection by handling and resolving grievances and claims in the most satisfactory manner possible.

For Bankia, customer protection and a fully-fledged grievances system are both essential in preventing, detecting, correcting and minimising any risk of non-compliance with the bank's obligations.

The Customer Service Policy is based on a set of principles fully aligned with the bank's values. These principles guide and steer the actions of the Customer Service Department to ensure a responsible management model, based on the independence of the bank's other services, including a single criterion and approach for reaching decisions, legal compliance, efficient management, objective decision-making, mandatory compliance, and full cooperation.

Bankia has one bank-wide Customer Service Department. It deals with grievances and claims submitted by any natural or legal person in relation to the services provided by the bank or its member companies, so that they can be resolved in full compliance with applicable law and regulations.

In particular, the department must verify compliance with the duty to disclose information to customers on the existence of the Customer Service Department and on the relevant deadlines for issuing a decision on grievances and claims, and to provide forms so that users can submit their claim in the first place, ensure that claims and grievances are submitted, processed and resolved in accordance with the department's rules and regulations, and ensure that deadlines are met and that the necessary information and documentation on how customers can submit their claim or grievance to the relevant supervisory body, including how the matter is then handled and resolved, is duly provided.

The main initiatives and projects undertaken by Bankia's Customer Service Department in 2020 were as follows:

- Maintain the 2019 levels of average resolution times.
- Seek solutions to minimise the impact on business of complaints and claims.
- Review and adapt to new case law on procedures for handling grievances.
- Make improvements to the service Bankia offers customers as a result of good practice recommendations and criteria of supervisors.

	2020	2019
No. of complaints received from customers	90,728	43,206
No. of complaints accepted for investigation	87,343	41,304
No. of complaints resolved in favour of the customer	40,687	16,756
Total compensation paid for customer complaints (EUR million)	7.3	5.1
Average response time for accepted customer complaints	11 days	9.46 days

b) Business model

Bankia's business model reflects its strategic priorities, with the customer at the heart of the business. The priorities of the business model are improved positioning based on active listening, enhanced processes to provide an unrivalled response to the needs of customers and constant adaptation of distribution models to provide the best possible service.

People and technology are the pillars of the business and customer satisfaction is our key management objective in differentiating Bankia from its peers within the financial system.

Bankia's distribution model reflects its focus on customer needs, where digitalisation and innovation are making services and products increasingly more accessible, more agile and easier than ever to use. Only through technology can we achieve the high levels of efficiency needed to ensure excellent and sustainable service.



Bankia's distribution network is a multi-channel model that features a mixed system of face-to-face and remote service and support, allowing the bank to constantly adapt to changing customer behaviours, depending on how they want to relate with their bank. The distribution model is flexible, quick to respond and personalised, allowing each customer to maintain the same contact person for all their affairs. Extending the use of digital media among customers is one of the objectives of the 2018-2020 Strategic Plan.

	2020	2019	2018	Strategic Plan
Digital customers (% of total customers)	60.5%	53.3%	45.4%	65%
Digital sales	46.9%	36.0%	25.8%	35%

Bankia's business model is structured into seven main lines of business:

- Retail Banking
- Corporate Banking
- Business Banking
- Bankia Asset Management
- Bankia Private Banking
- Bankia Insurance
- Real Estate Assets

STRUCTURE AND BUSINESS MAP

Turnover

	2020	2019
Total market share in Spain ¹	9.41%	9.97%

¹ Figures at September 2020. Source: Bank of Spain

Market share by autonomous region¹

¹ Figures at September 2020. Source: Bank of Spain

Market shares

	2020	2019
Branches ¹	9.34%	9.15%
Mortgages	12.17%	12.46%
Household loans	10.61%	10.91%
Household deposits	10.48%	11.01%
Card turnover ¹	12.53%	11.79%
Investment funds	7.51%	7.05%
Individual pension plans	7.91%	7.93%
Risk insurance ¹	6.19%	6.56%

1. Figures for September. Source: Bank of Spain

Physical branches

	2020	2019
No. of universal (traditional) branches	1,578	1,656
No. of perimeter branches	316	374
No. of agile branches	122	125
No. of recovery centres (specialised in defaults and late payments)	34	29
No. of business centres	59	65
No. of Corporate Banking centres	3	3
No. of Private Banking branches	16	16

RETAIL BANKING

Retail Banking offers a wide range of borrowing and lending banking products under a universal banking model. It encompasses retail banking activity with individuals and legal persons with annual income of less than EUR 6 million. It aims to achieve satisfaction and loyalty among customers, providing them with added

value in the products, services and advice we offer and in quality of care. It divides its customers into various segments, offering each segment customised service and support and tailored products and services, including end-to-end advice in response to their needs.

	2020	2019
No. of active retail customers (individuals)	7,086,601	7,386,168
No. of customers using financial advisory portfolios	3,712,041	2,243,345
No. of financial advisers	2,599	2,581

	2020		2019	
	Men	Women	Men	Women
Percentage of customers	48.37%	51.63%	48.3%	51.7%
Average customer age	50 years old	52.1 years old	49 years old	51 years old
Percentage of highly loyal customers	17.67%	14.01%	17.3%	13.6%

To improve this level of attention and personalisation, the portfolio model has evolved to provide more customers with a personal manager: a financial advisor at the branch nearest to their home or workplace, a Conecta con Tu Experto (Connect with your Expert) personal manager, whom they can contact from any device, or a Bankia manager. In this way, the customer enjoys personalised management, close monitoring of their products, information of interest based on their preferences, bespoke advice and access to special promotions, while also being able to contact their manager by phone and/or online.

The customer is free to choose how and when they want to deal with the bank. This option to interact through different service models and channels is a Bankia hallmark and sets it apart from other financial institutions.

Depending on their specific needs, customers can choose:

- Universal Branches: offering traditional face-to-face service.
- Agile Branches: also intended for face-to-face dealings, these branches come with extended opening hours and are designed for rapid transactions.
- Conecta con Tu Experto: offering remote customer service through the channel chosen by the customer, allowing them to arrange any product, even mortgage loans, and providing personalised advice always by the same manager and with the added benefit of longer opening hours.
- +Valor Branches: offering access to products and services to less digitally-inclined customers, to gauge their needs and steer them toward the service model they are after.

In addition, the Digital Management Office is responsible for managing lending operations from digital opinion leaders (including the Bankia website) and allows customers from the online world to handle their financial needs wholly remotely.

Rounding off this comprehensive framework of customer relations are the services provided via the bank's digital channels: Bankia Online, Bankia Móvil and Bankia Online Autónomos for the self-employed segment, all of which offer the utmost usability, contactability and customer orientation and provide a wealth of value-added services. 2020 saw digital channels take on chief importance due to the situation caused by the pandemic-induced lockdown.

In 2020, normal activity fell due to the COVID-19 pandemic and lockdowns put into place to combat the spread of the virus. In view of this situation, several initiatives were taken in terms of the services provided. The bank's central services staff worked from home and measures were taken at the branches (such as work shifts) in order to keep them open, as banking was considered an essential service. At the same time, the remote customer service provided to customers through the online channels was reinforced to guarantee smooth operation. The advisory model was maintained and complemented with the possibility of remotely signing

through the channels enabling the branches to keep up a significant part of their commercial activity. Similarly, the Conecta con Tu Experto service continued to be provided.

At the outset of the lockdown, in March and April, financial measures were also taken to alleviate the situation of several customer groups. Pensions and unemployment benefits were advanced, no-fee cash withdrawals were facilitated at third-party ATMs to avoid movement and the limit for contactless transactions was increased from EUR 20 to EUR 50 to facilitate card payments.

The activity of the Marketing Department was also hit by the pandemic and its economic consequences. The various areas began to work on plans to tailor products to the new circumstances, such as loan deferment, the extension of guarantee expiry dates and the marketing of ICO loans.

Digital customer relationship model

Within customer segments, those with the highest net worth and the closest ties are served by financial advisors and constitute portfolio customers. In addition, depending on their degree of digitisation, they are served by a digital financial advisor or a financial advisor at a physical branch.

Under this approach, a digital customer is considered to be a customer who uses online channels on a regular basis and does not go to a physical branch, and for whom all of Bankia's evaluation tools are used to improve the customer experience.

Bankia's digital customers are managed and advised through two different lines of business: Conecta con Tu Experto and +Valor.

As these are two fundamental business segments with individual customers, Bankia has a specific specialised department for coordination and development: the Multichannel Corporate Department.

- **Conecta con Tu Experto**

In 2020, consolidation of the Conecta con Tu Experto bespoke customer service model continued. This is made up of digital customer portfolios managed by a digital financial advisor who responds to all customers' financial needs through a comprehensive service that strengthens their relationship with Bankia. Conecta con Tu Experto customers currently contribute 30% of the Bank's mortgages, 20% of consumer loans and 6% of investment funds.

What sets a digital financial advisor apart is that, in addition to understanding the specific management tools, the advisor has a better understanding of the online channels offered to customers and the way in which customers can arrange products and services, as this type of functional advice is also necessary when arranging products on their own. Digital financial advisors therefore combine knowledge of the Bank's products and services with knowledge of the digital media and channels available to customers.

The level of customer interaction with digital financial advisors doubled, leading to a rise in activity ratios. Part of this activity focused on resolving queries related to deferment issues and COVID products made available by the bank. However, as activity gradually normalised, the degree of the relationship has not diminished substantially, which implies that the customer is satisfied, comfortable and secure in this type of relationship and marketing with Bankia. Bankia was at all times able to serve customers remotely and the digital financial advisors were even able to continue providing their services remotely from their homes.

This year, new Conecta con Tu Experto centres have been opened in Murcia, Granada and Palma de Mallorca, thus bringing the current total to 69 offices located in Madrid, Logroño, Valencia, Alicante, Murcia, Las Palmas, Tenerife, Granada, Seville, Palma de Mallorca and Barcelona, with 699 portfolios with which more than 950,000 digital customers are handled.

- **+Valor**

This is Bankia's digital sales platform, where the leads from digital marketing activity are handled (leads come from different application forms for Bankia products filled out digitally, both through the website and through other sites connected to Bankia, such as product comparators, real estate websites, etc.). It also has the office responsible for handling all the bank's mortgage leads from digital opinion leaders (including the Bankia

website). We thus provide any customer the possibility of maintaining their relationship with the bank on a wholly digital basis, without having to go to a traditional branch.

	2020	2019
No. of Conecta con Tu Experto branches	69	61
No. of Conecta con Tu Experto customers	965,898	749,881
No. of Conecta con Tu Experto specialised managers	699	571
No. of +Valor branches	13	13

Main business initiatives with retail customers

Bankia's relationship with customers takes shape through two value propositions, which are the result of ongoing dialogue with customers and which we use to feed their expectations and demands into the bank's commercial activities, with the aim of further improving satisfaction and loyalty and tailoring the range of products and services to market demands.

- **Así de fácil (It's that easy):** This continued to be the flagship of Bankia's positioning in 2020. It is Bankia's pledge to making day-to-day life easier for its customers by improving its relationship with customers in a bid to understand them better, offer them better services and financing options and make their lives easier.

It includes a range of services available through all management channels, both face-to-face and online, to broaden the communication options between customer and manager, and allow payments to be made via the method best suited to their needs: Bizum, Google Pay, Samsung Pay, Apple Pay or PayPal.

- In the first quarter of 2020, the Por Ser Tú programme evolved, with more than 2.8 million individual customers benefiting from fee waivers. The purpose of this programme is to:
 1. Have a greater number of more loyal customers.
 2. Continue to improve the excellent levels of customer experience.
 3. Make relationships profitable on a sustained basis.

	2020	2019
Number of customers who pay no fees	2,873,556	4,266,441
No. of new direct deposits of salary and unemployment benefits acquired	501,584	439,443
Total number of customers who have their salary paid into their account	3,429,142	3,491,855
No. of new credit cards issued to retail customers under the zero-fees programme	1,129,427	608,373
No. of new debit cards issued to retail customers under the zero-fees programme	520,900	711,340

When it comes to products and services for attracting customers, Bankia offers a wide range of products that cater to all customer profiles, mindful of the close relationship between risk and return, including demand deposits and investment instruments such as investment funds and pension plans, which are managed through Bankia Asset Management.

This catalogue of products is offered through a specific advisory service assessing the suitability of the customer's products, the amount, term and liquidity needs, making investment proposals and conducting suitability tests and annually monitoring their portfolio, ensuring that their investments are in line with their investment profile.

As regards demand account products, with the development of the Por Ser Tú programme for individuals, the accounts become the main support for service packages that customers can enjoy free of charge or for a fee, depending on their relationship with Bankia.



In the youth segment, the age limit for eligibility for a youth account was extended to 25 inclusive, meaning that youth account holders pay no bank charges until that age. Once holders reach 26 years old, the account then becomes a Easy account.

	2020	2019
Total volume of deposits of individual customers (households) resident in Spain (EUR million)	94,292	91,897

Within the financial sector, where it is increasingly difficult to stand out amongst other competitors, Bankia has brought added value to its range of products and services. For more traditional products, we have added emotional elements and/or ethical, environmental and/or social components to strengthen the bond between bank and customer, while also generating positive impacts on the communities and environments in which we operate.

Bankia has a basic payment account. This product responds to a social need, which is also regulated by Spanish legislation, offering fee waivers to particularly vulnerable groups.. It aims to ensure that the most vulnerable consumers are not excluded from access to financial services that are considered essential for them to be able to participate in economic activity. Thus, as regulated in Royal Decree 164/2019 of 22 March 2019, Bankia customers who are in a situation of vulnerability or at risk of financial exclusion are entitled not to pay any related maintenance and service fees. An express application must be submitted to Bankia to benefit from this right and documentary proof of the holders' fulfilment of the legal requirements that entitle them to the fee waiver must be provided.

In addition, Bankia is the first dog friendly bank with specific products and services for pets included in the Dog Friendly Pack, such as the Dog Friendly account and Bankia pet insurance.

For investment funds, which are a product regulated by the MiFID regulation, Bankia, as part of its advisory work, has an Investment Committee that establishes the funds that are distributed through the branch network. This committee selects the products to be recommended through another body, the Asset Allocation Committee, which agrees on the distribution of the different assets and categories, as well as the positioning by geographical area. The Investment Committee subsequently transfers this asset allocation to specific products, selected from the entire catalogue, which includes investment funds from the most prestigious fund managers in the market.

In order to advise clients on the most suitable investments, different services are available:

- Investment Committee recommendations: simple proposals for all manner of product. For investment funds and pension plans there is the possibility of recommending a single product (for lower amounts) or a basket of three products (for higher amounts).
- Profiled funds: a simple solution (a single fund from the Soy Así family) is recommended as the best investment option whenever the customer decides to delegate management to Bankia, based on their profile.
- Multi-product recommendations: when the amount of the customer's investment is higher, a recommendation is made that can comprise several products (deposits, funds, plans, shares) from different categories (liquidity, fixed income, alternative management, equities, etc.).
- Retirement planning: when the amount of the investment is high and the customer's savings objective long-term (retirement savings), favouring products that offer financial and tax advantages (pension plans).

The manager can select one of the four services and set investment preferences.

In addition, all investment funds can be arranged through online channels, with specific advice available for online marketing and, for customers who prefer to delegate management of their investments, there is a service offered by Bankia Gestión Experta.

In 2020, five funds were added to the product offering, completing the Index Range, which is made up of index funds, i.e. funds that replicate indices: Bankia Index RF Corto, Bankia Index RF Largo, Bankia Index Emergentes, Bankia Index USA and Bankia Index Clima Mundial. The others funds are Bankia Index USA Cubierto, Bankia Index Japón, Bankia Index España and Bankia Index Eurozona. A total of EUR 12.2 million are managed through this range of funds. In addition, the Bankia Garantizado Rentas 16 investment fund was launched, which is a guaranteed fixed-yield investment fund with a term to maturity of approximately six years and a volume of assets of EUR 200 million.

As regards pension plans, in 2020 the Bankia Protegido Renta Premium XV plan, a ten-year guaranteed plan with a committed amount of EUR 20 million, was marketed together with the wide range of pension plans.

In terms of investment portfolio management, Bankia Gestión Experta maintained very high levels of trading and made a considerable return, overcoming the uncertainty generated in the markets by the health crisis caused by COVID-19. In 2020, assets under management amounted to EUR 4,117 million, giving returns of between 2.02% and 6.9% for all portfolio types.

In terms of customer acquisition activity through Bankia Online and the Bankia app, activity in demand accounts has focused on driving sales to and the addition of new customers through digital onboarding, i.e. the process is secure, guaranteed and wholly digital and online through the ON account, which continues to be free of charge for customers with a digital profile. In 2020, this account grew by 10,726 new contracts. As to portfolio management, the focus laid on contracting the Bankia Gestión Experta online through Bankia Online and the Bankia app.

Linked to the crisis caused by COVID-19, with the entry into force of Royal Decree 463/2020 of 14 March 2020, a new exceptional case of liquidity of vested rights in pension products was included for a six-month period. The products affected by these measures were individual pension plans, insured pension plans, occupational pension plans, company employee welfare plans and employees mutual funds. The scenarios for requesting payment of the benefit and drawing on vested rights were as follows:

- Unemployed persons as a result of a furlough scheme (ERTE) arising from the crisis caused by COVID-19. The maximum amount available is set as the wages lost while the furlough scheme remains in force.
- Business owners of establishments that have been closed to the public as a result of article 10 of Royal Decree 463/2020 of 14 March 2020. The estimated net income lost while the establishment is closed to the public is set as the maximum amount available.
- Self-employed persons who had previously been registered in the social security system as such and have discontinued their activity as a result of the crisis caused by COVID-19. The maximum amount available is the estimated net income lost while the health crisis continues.

With respect to finance products and services, one of the bank's priorities is to improve profitability and its measurement by applying the RAR methodology, which enables it to determine the risk-adjusted return, both in setting rates and in pricing for negotiation with customers, thereby helping to rationalise and make price allocation more objective. The RAR provides information on the return on a transaction, taking into account the calculation of risk costs and capital used.

Two main lines of action stand out, which are consumer and home loans.

In consumer lending, the simplification and rationalisation of the product catalogue is buttressed by an omnichannel scheme. The bank continues to improve its range of face-to-face, digital and hybrid marketing products so that customers have easy, simple and clear access to the financing they need, which is always tailored to their needs, risk profile and borrowing capacity.

In pre-approved loans, personalised offers are launched for each customer regarding amount, term and price. The main added value is a three-month grace period for the first instalment to give customers the opportunity to make purchasing decisions in advance without having to start paying until three months later.

Similarly to the mortgage segment, to promote consumer loans, in 2020 a strategy of interest rate reductions depending on the customer's loyalty was introduced, resulting in the new Puedes más Bonificado programme, where customers can access the best rate if they keep using direct deposit with Bankia for their income. This reduction is reviewed quarterly and can provide savings of 200 basis points if the customer's salary, pension or social security payments are deposited at Bankia.

After completing the pilot in 2019, 2020 saw the mass rollout of Préstamo On, which is a wholly digital loan processed through Bankia Online and the Bankia App for both ordinary consumer purposes and following sustainable criteria. Prices are tailored based on the same credit profile as that of a customer with a pre-approved loan, in line with the significant boost being given to this type of financing.

	2020
No. of Préstamo ON loans	1,296
No. of Préstamo ON Sostenible loans	66
Préstamo On volume (EUR million)	6.95
Préstamo On Sostenible volume (EUR million)	0.86

Lastly, the financing offer for young people has been unified with a single youth loan with no arrangement fee and the best interest rate in the catalogue offered by Bankia.

In home loans, the offer has been completed by covering all business opportunities with the launch of three new products:

- Hipoteca Bonificada, which complements the no-fee Hipoteca Sin Comisiones. It enables borrowers to access the best rates without being tied to a certain level of income; rather, they need only meet certain minimum loyalty requirements, which are direct deposit and the arrangement of a home and life insurance policy. Meeting these conditions can reduce the interest rate by up to 140 basis points. This product has been launched both for new mortgages and for subrogation, the latter for customers who have their mortgage with other banks.
- Hipoteca Verde, to finance the purchase of sustainable homes with A or B energy certification, applying the lowest rates in the commercial catalogue. No loyalty conditions are required and the main fees are not charged.
- Hipoteca ON, which allows you to carry out the entire process remotely, without going to a branch, 100% online through Bankia Online and the Bankia App. To contract this mortgage, customers have a specialised support and guidance manager throughout the digital process. In 2020, this mortgage accounted for 0.114% of total mortgage origination, with 37 transactions that exceeded EUR 4.5 million.

Both the Hipoteca On mortgage and Préstamo On loan are products designed for those customers who have a suitable digitisation profile. Thus, the scope of customers who could access both products through the process was 1.56 million customers for the On loan and 1.65 million customers for the On mortgage.

As part of its sales activity, Bankia has been proactive in bringing mortgage products to customers who were dissatisfied with their mortgages at other banks. In 2020 this meant that a significant share of new loans was secured through this type of action. In 2020, 1,759 loans amounting to EUR 220 million were subrogated from other banks.

	2020	2019
Number of new mortgages arranged ¹	27,534	25,207
No. of new mortgages arranged under the zero-fee programme	21,835	20,651
Volume of mortgages arranged (EUR million)	3,367.2	2,944
Volume of mortgages arranged under the zero-fee programme (EUR million)	2,574.5	2,402

1. Including reschedules.

As a result of the exercise to identify risks and opportunities within the mortgage business and to provide housing solutions to customers, in June 2020 the new Aval Alquiler Vivienda (Housing Rental Guarantee) was launched, which is a guarantee exclusively for rental purposes:

This consists of Bankia offering the customer a bank guarantee to access the rental market, which expedites the customer's negotiations with third parties and provides the greater reliability of being a guarantee issued by a financial institution, with the added value that its application cost is lower than that of applying for a loan or tying up money for the same purpose.

Lastly, in such a difficult year due to the impact of COVID-19, in the areas of personal loans and mortgages, Bankia has joined and actively participated in the different public and sector-based solutions that have been put into place to alleviate the financial burden of customers who find themselves in situations of social and economic vulnerability as a result of the pandemic.

The regulatory measures include:

- Mortgage deferment solution: RDL 11/2020 for which a grace period of up to three months for principal and interest has been offered.
- Sector-based mortgage deferment solution whereby a grace period of up to 12 months for principal has been offered.
- Consumer loan deferment solution: RDL 11/2020 aimed at individuals and self-employed persons, whereby a grace period of three months for principal and interest has been offered.
- Sector-based consumer loan deferment solution aimed at individuals and self-employed persons, whereby a grace period of six months for principal and interest has been offered.
- COVID-19 Rental Guarantee line to extend state-backed financing for six monthly instalments to cover the rent of a household's principal residence.

Bankia has also established a suite of Bankia-specific measures, *#JuntosEsMásFácil*, which provide solutions with a social, human and economic focus to move closer to customers:

- As an essential service, Bankia has kept most of its branches open to the public, with approximately 87% of its staff in branches, while following health and hygiene controls in access to branches and customer service.
- The state of emergency and lockdown led to a greater digital presence as a direct channel to customers. Every month around three million personalised emails and five million welcome pages were sent through the Bankia Online, Bankia App and Cashpoint channels together with one million SMS and push messages. These omnichannel communications have shown customers the various ways of interacting with the bank and alerted them on how to act to avoid possible fraud attempts, such as phishing.
- In this respect, digital channels have been exceptionally important in 2020, providing customers with the possibility of withdrawing cash from any cashpoint free of charge, thus avoiding trips during the strictest times of the lockdown.
- Cash withdrawal limits on debit cards were increased to avoid customers having to key in the PIN code, thus preventing contact with payment devices (POS) as a hygiene measure.
- Flexibility in the application of the conditions of the Por Ser Tú programme. This waived fees for families whose income had been hit and found themselves in a more vulnerable situation due to the effects of the pandemic. These measures were applied during the months of lockdown from March onwards, benefiting approximately 300,000 customers.
- "Estamos a tu lado" (We're at Your Side). This was an initiative carried out together with Fundación Alares to provide the elderly with free services as necessary as delivering shopping and medicine to their homes or providing a telephone for health consultations and psychological support. The aim has

been to try to reach the more than one million customers who are pensioners, either through a call from a branch manager or through omnichannel communications. As a result, more than 13,000 customers benefited from this measure.

- Dates for unemployment and pension payments were brought forward. Direct communication was opened with beneficiary customers to apprise them of the exact date of payment of their benefits, which benefited more than 256,000 of the bank's customers.
- Customers were informed of the possibility of availing themselves of the various deferment solutions, both sector-based and those included in the Royal Decree approved by the Government both for consumer loans and mortgage loans.
- Support for families was reinforced with communications about the additional services provided by their MAPFRE home and health insurance taken out with Bankia: telephone medical support, digital protection, remote IT assistance, video consultation, medical chat and online pharmacy, among others.
- Bankia also championed the most vulnerable groups by launching a promotion aimed at employees of essential services (healthcare workers, security forces from the various areas of government, etc.), offering incentives for the purchase vehicles with Bankia Renting.

Undoubtedly 2020 was marked by the events arising from COVID-19. This situation substantially altered the commercial dynamic, with consumer lending to households slowing down significantly. The branches of activity that grew the most were those most affected by the lockdown measures and, therefore, the ones that have received the most financing linked to ICO lines. The other side of the coin has been the savings arising from being in line with the forecasts established for both investment funds and individual pension plans.

Cards, new payment methods and card payment processing

In 2020, the means of payment in Bankia were severely affected by the COVID-19 pandemic and its effect on household and business consumption.

On the issuing side, the use of Bankia cards in shops increased compared to cash withdrawals at cashpoints. Although card purchases did not grow at the same pace as in previous years, they performed positively (4%), largely thanks to e-commerce purchases, which offset the decline in traditional commerce. Cash withdrawals with Bankia cards at cashpoints were lower than in the previous year.

The number of Bankia cards continued to rise to more than 9.6 million, largely thanks to the marketing of credit cards, which account for 40% of the total.

	2020	2019
Total number of cards issued (millions)	9.66	9.31
Total number of contactless cards (millions)	7.78	7.16
Amount of card billing for e-commerce (EUR million)	4,145.1	3,434.9
Total number of POS terminals	173,926	170,327

Over the course of 2020, several initiatives have been taken in relation to payment methods that have boosted the use of cards. In March, the limit on card purchases without a PIN, using contactless technology, was raised from EUR 20 to EUR 50, which has encouraged the use of cards for smaller payments, and between April and July Bankia cardholders were able to make cash withdrawals at the cashpoints of any domestic bank at no cost, as Bankia does not charge them the fee applied by the cashpoint owner.

In 2020, Bankia consolidated its position as a leader in digital payments, with the integration of its cards in the market's main mobile platforms: Apple Pay, Samsung Pay, Google Pay and Bankia Wallet. Bankia customers can add their cards to the wallets of these digital giants and by using the push provisioning features, which links the card from Bankia's own mobile application.

The use of mobile phones to make payments has a substantial presence. The percentage of in-person purchases made using mobile phones accounts for more than 11.8% of the total.

	2020
Total number of customers added the card to Apple Pay, Google Pay, Samsung Pay and the Bankia App	1,073,008

Immediate transfers have continued to grow and now account for 62.1% of all transfers made at the bank. This service provides extraordinary agility in the availability of liquidity and in making payments, as it enables customers to transfer up to EUR 15,000 to another account in Spain in a matter of seconds.

Bizum has surpassed the customer and transaction records set in 2019, reaching 1.5 million users and 23.3 million transactions sent by Bankia customers in 2020, who can send and receive money simply by using the mobile phone number of the service's other users. Moreover, payment with Bizum has set in as an alternative means of payment in e-commerce, with peak transactions occurring both in lockdown and during the Black Friday and Christmas periods.

As proof of the relevance and growth of Bizum as an innovative, easy-to-use, secure and agile means of payment in its transactions, Bankia has added two new features:

- Bizum ONG: through this service, Bankia's NGO customers can receive donations from Bizum users, regardless of whether or not the donor is a Bankia customer.
- Bizum SELAE: a new service for mobile payment of bets and collection of winnings at the nearly 11,000 points of sale of the State Lottery and Gambling Company (SELAE).

Digital channels and open business

Bankia's digital channels continued to develop in 2020 with a two-fold objective: improve the digital customer experience and customer engagement, while boosting sales of digital products and services.

In this connection, one of the main achievements in 2020 was the definition and launch of the bank's new mobile application, the 2020 App, which was a complete overhaul of the previous application, with a notable improvement in user experience and functional development. The sale of digital products has been built in with new sales triggers, i.e. the automatic sending of messages based on events or customer behaviour, which enable greater offer personalisation.

The new application has been highly rated in terms of its improved performance, consolidating its position in the second quarter of 2020 among the three top-rated entities in mobile digital banking in Spain, especially for its speed, based on the report prepared by Aqmetrix, a company specialising in the assessment and rating of the quality of service offered by online banking.

As for the private website, Bankia Online continued to improve its sales journeys, which are the processes followed towards the purchase of a product or service based on a need that arises, optimising them and completing the catalogue of products and services available. In this regard, home insurance and single-premium personal loan repayment insurance were added as new products that can be arranged online. In addition to the marketing of insurance, the channel offers the possibility of splitting premiums through the Bankia Igual Tarifa flat-rate service, which allows customers to group together the annual amount of their insurance policies and pay them in instalments month by month in a single bill, thus allowing them to better plan and manage their expenses.

	2020	2019
No. of Bankia Online users	3,608,487	3,217,298
No. of transactions completed through Bankia Online	16,674,607 ²	26,971,084 ¹
No. of Bankia App users	3,598,118	2,881,310
No. of transactions completed through the Bankia App	29,627,198 ²	32,147,738 ¹

1. Volume of transactions completed for operations tagged in Bankia Online, which are those that can be monitored through web analytics.

2. The transactions included are transfers and payments.

Notable in respect of digital lending is the continued marketing of the ON loan and mortgage products, with greater access for customers in 2020. In both marketing processes, customers have a specialised manager who accompanies them throughout the transaction, making it a simple process, with wholly online loan disbursement.

Bankia Online has also improved its mortgage loan simulation tools, with the addition of the new simulator function that allows customers to find out the financial feasibility of the transaction. All that is required is a few simple details about the customer's financial position. No additional documentation is necessary.

During the difficult situation experienced during the state of emergency caused by COVID-19, the digital channels gained particular importance and were made available to customers with their usual operations and level of service. They also enabled customers to apply for and manage the aid provided by the government, as well as other additional aid provided by Bankia. In this regard, various application forms were included in the channel, along with the possibility of providing the necessary documentation for processing the various mortgage and non-mortgage deferrals approved by the government. The application for COVID-19 rental assistance is still available for all Bankia customers who need it because they are in a situation of economic vulnerability caused by the pandemic.

No plan to renew the current cashpoint stock was implemented in 2020. The only actions carried out fell within the branch closure plan, which involved relocating cashpoints from closed branches to other saturated branches.

	2020	2019
No. of ATMs	5,182	5,361
No. of modernised ATMs installed during the year	23	358
No. of transactions completed through ATMs	205,452,398	268,454,631
No. of ATMs featuring NFC technology	4,343	4,494
No. of accessible ATMs (audio system)	4,918	5,080
No. of ATMs in sparsely populated areas	824	535

At the end of December 2020, there were 5,182 cashpoints (4,445 in branches and 737 off-premises), with more than 75% of branches having ATMs with advanced functionalities.

In 2020, the open business strategy focused on developing Personal Finance Management (PFM).

The objective was to take PFM a step further, moving from being a purely informative tool to a proactive one that recommends financial products to customers that enable them to save in their day-to-day and with new functionalities such as the development of alerts so that customers can learn about the Bank's products or services at the right time.

In terms of financial aggregation, the PFM service has been opened up to all digital customers both in Bankia Online and through the new Bankia App, and since March it has been possible to include deposits, loans, funds and pension plans, in addition to the accounts and cards that had already been available since 2019. In addition, information on accounts and cards is integrated within the Mis Gastos (My Expenses) section of the PFM, as well as in the advanced search engine, allowing personalised alerts to be generated and any movement to be easily located.

Since July, customers have been able to exclude the expense and/or income movements that they do not want to be taken into account for the analysis of their expenses or income in the PFM. There is also the possibility to quickly and easily re-include the transaction to be added in the analysis.

The banks for which the aggregation service can be used are CaixaBank, BBVA, Sabadell, Santander, OpenBank, Bankinter, ING and Unicaja.

Relationship sales positioning

Due to the importance of this facet of the business, Bankia created a specific structure in its organisational chart with the aim of promoting the marketing of third-party products and services to Bankia customers in an attractive way by securing notable advantages for them, such as special offers and discounts or unique products and services. All of this is complemented by Bankia's range of financial services and digital payment solutions, such as means of payment and credit, insurance, etc.

For business partners, this means access to a large customer base through already established distribution channels (network and digital), with an improved financing offer.

The objective for Bankia is to achieve new revenue streams with higher margins and build customer loyalty through new value propositions in collaboration with top level partners by:

- Centralising the relationship sales activity through the Group company Bankia Commerce, S.L.U., incorporated in 2019.
- Signing new agreements with third parties to add Bankia to their business model.
- Developing standard and flexible models internally based on the bank's digital and payment solutions: Bankia Connect, APIs, Waiap, Soyoo, financial aggregator, etc. to streamline the integration and implementation of partnerships.
- Making Bankia the perfect sandbox to test and promote PSP and open business developments and promote the integration of both solutions in partners.
- Expanding and strengthening the relationship sales offer to have a significant number of partners of leading brands with exclusive offers with which to create a marketplace for customers and non-customers alike.
- Building in new financing and online payment formulas.

In this context, the most relevant projects in 2020 were:

Bankia Renting

In 2020, the collaboration with Alphabet (a company specialising in the sector and belonging to the BMW automotive group, with which Bankia began a relationship in 2018) was strengthened.

The vehicle leasing offer continued through quarterly campaigns and commercial actions to facilitate orders for all customer segments and with all services included. It included the Bankia Quality Guarantee whereby, for certain vehicles, customers can return the vehicle free of charge within 30 days if they are not satisfied.

Bankia Renting has continued to focus on sustainability, and hybrid and electric vehicles have been present in all the campaigns launched for customers.

In addition, this year, due to the situation caused by COVID-19, various specific initiatives were conducted to help customers deal with the consequences of the coronavirus epidemic. Bankia reached an agreement with Alphabet for customers to benefit from a three-month grace period, deferring payment of these instalments for the remaining months of the contract. This measure was available to individuals, self-employed persons, SMEs and companies.

In addition, in June and July, customers who worked in the essential services of this pandemic (healthcare, state security forces and armed forces) were given EUR 200 worth of fuel when they contracted a Bankia Renting vehicle.

Bankia Shop

Bankia Shop was launched in June 2020. It is an online sales site of the Group company Bankia Commerce, S.L.U., which allows Bankia's digital customers to buy top-brand consumer products in one click, with financing offered by the bank at 0% APR.

From the shop's user area, customers can easily engage in typical e-commerce activities: modify personal details, track orders, view purchases made and handle returns.

Bankia Shop offers a product catalogue of up to 18 different categories from top brands, with more than 100 technology, fitness, rest-related and beauty products. In addition, Bankia Shop also offers products that offer sustainable solutions, such as electric motorbikes and bicycles.

Bankia Shop offers customers free delivery and returns, free delivery to the address of their choice and special services such as installation and removal of large household appliances, all through simple and intuitive processes that allow them to request and receive these services.

Since June, Bankia Shop has been accessed by nearly 143,000 people and 38,100 users have registered.

Energy services (Aldro and Endesa)

In 2020, agreements were also signed and implemented with two major partners in the energy sector, Aldro and Endesa, to offer customers access to green and sustainable energy consumption

energy sector, Aldro and Endesa, to offer customers access to green and sustainable energy consumption with exclusive rates for electricity and gas utilities and their respective maintenance, via switching, i.e. connecting equipment and their peripherals to share information and interact (e.g. thermostats) and determine maintenance in a predictive manner.

In addition to being closely linked to financial products such as mortgages or loans and providing a blanket solution to customers' day-to-day needs, these agreements are in line with the bank's commitment, set out in the 2019-2020 Responsible Management Plan, to promote sustainable development and contribute to achieving a low-carbon economy.

Alarm service

In 2019, collaboration began with Prosegur Alarms, a leading international company in the security sector based in Spain, and an agreement was signed to promote, through its branch network and digital channels, no-cost financing (0% APR and 0% NIR) for the installation of alarm systems for Bankia customers.

Customers with a pre-approved credit line with the bank can obtain the loan immediately, while customers who do not have one can apply for it quickly and easily. The alarm contract with Prosegur has a special price for Bankia customers and is offered both in residential, to cover the needs of homes by providing coverage for practically all types of housing, and in business, designed for companies and businesses, including services such as Acuda (surveillance service where they can come to your home with the keys to check that everything is OK or to open the door) and Contigo (protection system integrated in the Movistar Prosegur Alarmas app for when you are away from home or the business).

BANKIA PRIVATE BANKING

All activity in 2020 was marked by the COVID-19 health crisis.

On the heels of a magnificent 2019 in the markets, 2020 opened with reasonable macroeconomic forecasts, but due to the pandemic and the declaration in March of the state of emergency, the markets performed adversely and were extremely bearish and highly volatile in the first weeks due to absolute uncertainty about the scope of the pandemic and the impact that its duration could have on the Spanish, European and international economies, especially in the Asian market and in emerging countries.

Bankia Banca Privada's first reaction was to immediately transform and adapt its customer relationship model.

In the initial period of the pandemic, the managers' activity focused on advisory services. At Bankia Banca Privada, in March and April the focus was on talking to all customers, keeping them apprised of the changes in their positions, making individualised investment proposals and rebalancing portfolios to the appropriate risk levels for each case. To this end, the use and adaptation of remote communication channels, especially video calls and video conferences, as new management tools with customers, was fundamental. This ensured that dialogue and service remained fluid, immediate, transparent and efficient, thus maintaining the relationship with the customer in an environment of trust and security, both for decision-making and for carrying out transactions. The quality survey sent to customers at the end of 2020 revealed the highest overall satisfaction rate in history with Bankia Banca Privada's manager (95.6%).

With the start of the de-escalation and the gradual return to normality, the markets began to recover. Equities rebounded sharply, heavily impacted in the last quarter of the year by the approval of the various vaccines. These events accentuated volatility in the markets, which highlighted the importance of professional and personalised advice in order to maintain appropriate portfolio diversification.

The new formats of advisory events were particularly important in this relationship with customers:

- Specialised webinars on markets, investment products, new investment trends, etc.
- Online conferences, with the participation of prestigious speakers and collaborators.

The number of connections ranged from approximately 200 to 500 connections, depending on the subject matter. It has subsequently been noted that the chosen topics have been viewed on YouTube in large numbers.

In addition to all these measures to provide financial services, Bankia Banca Privada continued to work to offer a complete range of products through a broad investment catalogue, with an open architecture of investment funds, multi-asset portfolio management, an ongoing offer of structured bonds and alternative products for suitable customers. This catalogue includes the marketing of products categorised as responsible investment or belonging to entities and/or companies with responsible investment policies for the development of investment instruments, such as our Bankia Futuro Sostenible impact fund and the Arcano Earth private equity fund marketed at Banca Privada in 2020. In addition, analysis was reinforced with the certification of our own CESGA-certified fund selection team.

As a result of the high demand for alternative products, we launched the marketing of the MCH Global Alternatives fund among our customers. Our Bankia Megatendencias fund received significant subscriptions throughout 2020, with this new form of diversification demonstrating exceptional performance in difficult market times, with a cumulative return in 2020 of over 20%.

Against this backdrop, portfolio management has taken on special relevance as a formula for greater agility to take advantage of investment opportunities and to be able to take advantage of centralised management by professionals. This trend is expected to continue in the coming months, with the launch of new management formats adapted to different customer needs.

The private banking business model has been consolidated in 2020, which entails a successful adaptation in terms of customer relationships, with a considerable increase in new customers at Bankia's branches.

At the end of 2020, Bankia Banca Privada had a team of 84 managers, plus five regional directors, managing a total of 9,404 portfolios. The private banking team is made up of 112 people, including the wealth and tax advisory departments, product advisory and analysis, and support staff for sales managers.

	2020	2019
Total number of Bankia Private Banking customers	12,145	10,628
No. of portfolios	9,404	7,938
Business volume (EUR million)	7,379.28	7,313
No. of specialist managers	84	83

BUSINESS BANKING

Corporate finance activity was hit by the crisis caused by COVID-19. Bankia has therefore adapted quickly to the environment generated, rapidly offering products and services on the market that did not previously exist in order to provide financial coverage in accordance with the expectations and needs detected in the market and among customers.

In 2020, Bankia reached a market share of 8.17%, up 33 bps in the year in financing to Spanish businesses as a whole. The entity signed EUR 32,875 million in loans to self-employed customers, SMEs, developers and large companies through 96,074 transactions.

Self-employed customers and retailers

This business segment is a priority for the bank and, as such, they deserve specific knowledge and monitoring to identify and understand their needs. To this end, Bankia has a network of specialists focusing on different areas: SME managers deal with businesses with annual revenue of over EUR 1 million; business managers cater to customers that turn over up to EUR 1 million a year; some branch managers focus on private individuals and other business customers; while other managers specialise in finance for retailers in shopping districts.

The Action Plan is based on five lines of action:

- ICO. The segment's clients were supported in dealing with the situation caused by the pandemic while increasing the coverage of lending operations.
- Working capital/prequalification
- Positioning. Through the Por Ser Tú Autónomos (For the Self-Employed) programme, we offer service fee waivers for loyal self-employed customers.
- Card payment processing Commercial actions that promote the increase of the POS stock, as well as the related billings.
- Payment methods. With the promotion of contracting and use.

Customer service for self-employed customers is also provided through Conecta con tu Experto, as this platform also has specialised portfolios for self-employed customers. At the end of 2020, this service had served 39,006 self-employed customers.

	2020	2019
No. of self-employed customers	512,582	533,738
No. of self-employed customers in the free banking programme	186,120	273,447
Financing granted to self-employed customers (EUR million)	417.7	230.2
Market share of self-employed customers	15.40%	16.20%

Throughout 2020, various initiatives were carried out to support the segment in managing the healthcare crisis. Prior to the creation of the ICO COVID-19 financing lines, Bankia identified the difficulties that customers were most likely to have to overcome and launched a suite of provisional actions aimed at providing customers with liquidity, such as:

- Renewal of working capital, designed so that our customers would not have to worry about their working capital lines under review during the first three months of the state of emergency.
- Liquidity credit account, for more immediate liquidity needs from March onwards.
- Bridge loan to cover obligations arising from loan and lease instalments maturing up to May 2020 and until public aid was received.

- Maturity of working capital positions, offering the possibility of extending the maturity of those working capital drawdowns with a deadline of 30 June 2020.

Following these preliminary measures, we initiated actions related to ICO COVID-19 financing with various lending products. Through the commercial network, a total of 44,384 loans were formalised, for a volume of EUR 3,607.7 million, of which 11,794 totalling EUR 254.6 million were written with self-employed customers.

At the same time, an ambitious commercial action was launched, with an impact on 359,659 customers: “Estamos más cerca que nunca” (“We are closer than ever”). Through this, business activity portfolio managers sent a personalised message of support to their customers, encouraging them to use the bank's digital channels (Bankia Online Empresas and Bankia Online Autónomos) in order to follow the official health recommendations. This initial e-mail was followed up with a call from the manager in the following days, bringing them even closer.

In addition, solutions have been sought in the social area, such as making Por Ser Tú Autónomos more flexible, with the aim of adapting the conditions of this programme to the customer's needs, applying the best terms for the customer to benefit from the fee waiver programme. This measure has enabled close to 29,100 customers to waive service charges on all their accounts, with very simple and easy-to-meet requirements.

In this vein, in insurance and the self-employed segment, COVID-19 measures were implemented, which consists of the partial refund of two months of the premium paid for their accident insurance, conditional on renewal of the policy.

To enhance the customer experience, a specific newsletter was launched, through which SME, retail and self-employed customers receive information every quarter on tax developments, tax queries and major milestones in their tax calendar. It was received by 274,474 customers in October 2020.

- Card payment processing and e-commerce

The economy was hit hard in 2020, with small and medium-sized businesses in particular suffering sharp declines in turnover.

Aware of the special circumstances, during the lockdown period, measures were taken to support small and medium-sized retail businesses, such as the refund of maintenance fees or the flat rate for those months when the business was closed and for those businesses that had not charged using the terminal.

Having overcome those moments, turnover in 2020 was 2.74% lower than in the previous year, but these figures are better than those recorded on average by the market, which highlights Bankia's sensitivity to retailers and the reward for their loyalty.

In any event, improvements have been made in various aspects of this activity:

- Inclusion of a 0.50% reduction in transactions using the Servicio Divisa Elección carried out at small and medium-sized retailers.
- Personalised management with independent prices for transactions with B2B cards in the travel and leisure sectors.
- Simplification of the Fácil flat rate with fewer price steps.

For the second consecutive year, Bankia has a specialist POS support service. This is a hotline of specialists who provide telephone support to branches and customers on POS, especially e-commerce support. As an option, they also provide support by e-mail. Accordingly, both the branch network and retailers are supported by a high quality and easily accessible service.

Lastly, as regards e-commerce, the effects of COVID-19 have indeed been felt, but to a lesser extent than in the case of in-person retail.

Of note is the growing search for solutions that allow remote payment. To this end, Bankia has launched Pago por Link, a formula for managing online sales without needing a website. Using this service, any self-employed person or company can charge their customers by sending a payment request by SMS or e-mail.

More than 500 customers already enjoy this service and have invoiced more than EUR 10 million.

Bankia has also adapted to Payment Services Directive II requirements to improve the security of our merchants and maximise transaction completion.

SMEs

In 2020 we continued to work towards becoming the bank of choice for small and medium-sized enterprises.

In a difficult year for many companies, Bankia maintained close contact with its customers to provide the financing needed to carry out their activity, vastly increasing the amount of SME financing with over EUR 8,700 million granted in 2020.

This was all channelled through the advice of our specialised managers, who have been able to adapt to the situation caused by the health crisis in 2020 with new tools such as video calls, through which up to 60% of our companies consider that they could replace going to the office for queries or incident resolution.

	2020	2019
No. of SME customers	189,643	201,423
No. of SME customers in the free banking programme	39,575	44,553
Market share of SME segment	13.10%	13.30%
Financing granted to SMEs (EUR million)	8,782	3,456
Total number of specialised SME/retailer managers	273	259

Bankia has made a major effort to help companies cope with the economic and social impact of COVID-19, with transitional measures at the start of the pandemic such as extending the terms of working capital financing or bridge financing solutions for long-term debts, in addition to the EUR 3,350 million in financing extended and backed by the ICO COVID-19 line for more than 32,400 SMEs.

The latest quality surveys for 2020 show that more than 60% of our SME customers rate the treatment received by Bankia in relation to the COVID-19 crisis as very good or excellent.

In 2020 we developed our customer relationship programme further with the launch of the new Mi Negocio account for companies with turnover of up to EUR 1 million, in which the customer does not pay for the main services by if certain loyalty requirements are met. Currently, more than 39,000 SME customers benefit from the fee waiver for these accounts. In order to take advantage of the benefits, customers must pay their social security or taxes by direct debit and also meet two loyalty requirements.

Bankia also sponsored a total of 18 online events in October and November, organised by La Neurona, an Interban Network project run by specialists in B2B markets. It is the first 360-degree platform on the market to offer high value content for managers and professionals, with the aim of supporting the business of small and medium-sized companies and the self-employed. These conferences featured speakers specialising in areas such as financing, digitalisation, innovation, taxation, training, positioning, sales and people, etc.

Farming sector

Bankia is committed to sustainably supporting the farming sector, which constitutes a strategic segment. In 2019, a strategic plan for the agricultural business was launched with the aim of consolidating Bankia's positioning in this sector and in the areas in which it operates. The plan aimed to create a specialised structure, to identify part of the branch network and specialise it in the agricultural sector, to redirect the catalogue to adapt it to the real needs of the sector, to provide specialised training programmes and to promote useful tools in remote channels.

The bank has a structure specialised in agribusiness in six of its twelve regional divisions. This structure provides aid and specialised technical support to the sales network and, above all, to the 378 agro-branches, where there is an expert agro manager who serves this group with an understanding of the business of these customers and advises them on the best financial and insurance solutions available to them. In the year, work continued on improving the support structures with the creation of a team specialising in agricultural insurance to cover all the sector's insurance needs (agro-insurance and business insurance aimed at covering any type of farm or agrifood company).

These specialist teams advise, support and promote farming businesses within their regions to provide expert personalised service for each specific type of farm. This approach enhances the quality of customer service and effectively tracks the farming cycle by tailoring the bank's financial solutions to the real needs of the specific farm.

Each kind of crop or livestock requires a specific solution. Our experts seek out the right arrangement: for example, in the face of adverse weather or pest events that damage a harvest our customers are advised on how to cover the cost, plan for future growing seasons and find the right farming insurance in the light of potential future risks and impacts.

Moreover, Bankia has adapted its processes and models to the specific circumstances and characteristics of the sector, in terms of risk approval, the offering of new insurance solutions and identifying possible official aid.

	2020	2019
No. of agriculture customers (business activity)	60,430	67,030
Financing granted (EUR million)	4,246.13	4,265.08
Total number of managers specialising in agriculture customers	378	381

The farming segment continues to benefit from the Por Ser Tú programme, which enables customers in the agricultural sector to get free banking on all their accounts if they meet very basic loyalty requirements.

In order to offer a greater capacity to create value for customers in this segment, Bankia has a general advisory and processing service for Ayudas Agrarias PAC (official farm subsidies). Customers can apply for subsidies in any of the autonomous regions where Bankia has branches specialising in the agricultural sector. In 2020 and due to the health crisis caused by COVID-19, certain processes were adapted to provide a closer service to customers, even though the relationship was remote. This included the processing of agricultural subsidies, which due to home lockdowns was carried out through digital channels, keeping farmers and livestock customers from having to travel to branches to carry out the procedure. Throughout 2020, 15,699 customers processed their applications through Bankia.

Also in 2020, the information sections on the website's farming area were expanded, with sections on events in which Bankia collaborated and sector trends to bring together all the news and reports on new developments and innovation in the sector, and a subsidy search engine was also offered so that customers could find the aid that best suited their profile and thus apply for it.

Companies

	2020	2019
Total number of business banking customers	28,542	29,697
Total number of managers specialising in business banking	215	216
Penetration rate in business banking	37.60%	39%
Volume of credit granted (completed transactions) to business customers (EUR million)	23,377	12,629
Volume of customer funds managed in Business Banking (EUR million)	6,073.08	5,370

Faced with the scenario arising from the COVID-19 health crisis, the bank initially rolled out a broad package of measures to support its business customers in coping with the difficult economic situation brought about

by the pandemic in Spain. Bankia extended the renewal periods for working capital lines before the liquidity of the financing lines backed the Official Credit Institute (ICO) was implemented.

This solution helped to alleviate cash strains in trade financing activities where COVID-19 has had the greatest impact:

- Foreign trade
- Reverse factoring
- Trade discounting
- Non-recourse financing
- Factoring facilities
- Credit accounts

Subsequently, until the ICO COVID-19 loans were launched, Bankia offered its customers the possibility of financing through its own urgent bridge facility adapted to the difficult position in which business activity found itself.

Following the Royal Decree of 17 March, at the beginning of April 2020, the bank placed the ICO COVID-19 products on the market with an extensive catalogue:

- ICO COVID-19 business loan and credit: Designed with the aim of enabling companies to cover their liquidity needs, including those arising from maturities of other financial obligations (not refinancing) or tax obligations to keep jobs in place and mitigate the economic effects of COVID-19. The purpose of these products is to meet financing needs such as salary payments, invoices, working capital needs and other liquidity needs, including those arising from the maturity of financial or tax obligations.
- ICO COVID-19 guarantee line, vehicle sub-tranche: In accordance with Resolution of the Council of Ministers of 16 June, published in the Official State Gazette of 18 June, the purpose of the vehicle sub-tranche is the acquisition or finance or operating lease of new road transport motor vehicles for professional use by companies or self-employed individuals.
- COVID-19 ICO reverse factoring line: A product that consists of managing a company's payments to its domestic suppliers, offering them the possibility of advance payment prior to maturity. This product is aimed at preserving the flow of payments to suppliers, financing and working capital and liquidity levels sufficient to mitigate the economic effects of the health crisis. Financing regulated by Royal Decree-Law 8/2020, which provides for the possibility of a state guarantee through the line of guarantees to cover financing granted by credit institutions.
- COVID-19 ICO investment loan: Loan to promote and support new financing to the self-employed and companies so that they can make new investments in Spain mainly aimed at adapting, expanding or renewing their production and service capacities or for restarting or reopening their activity. Financing regulated by Royal Decree-Law 25/2020 of 3 July 2020.

The eligible investment purposes are:

- New investment in Spain, including current and capital expenditure linked to the investment, which are justified by the company.
- Investment and/or current and capital expenditure aimed at expanding, adapting or renewing production or service capacities.
- Investment and/or current and capital expenditure aimed at restarting or developing the activity.

- Current and capital expenditure associated with or earmarked for, inter alia, the acquisition, rental or lease of equipment, machinery, installations, supplies of materials and goods and services relating to the investment and/or activity of the company, including, inter alia, job creation and maintenance, R&D+i expenditure, etc.
- Financing needs arising from, inter alia, payment of salaries, invoices or current financial or tax obligations.

With all these actions, Bankia has taken up a 9.4% share of the ICO COVID-19 guarantee facility with a total lending volume to businesses, SMEs and self-employed workers of EUR 10,941 million.

Also, with a view to enabling Spanish companies to promote their activity abroad, Bankia reached an agreement with Compañía Española de Seguros de Crédito a la Exportación (CESCE) to create the CESCE COVID-19 Foreign Trade Line for financing with coverage under CESCE's "Insurance policy for working capital loans", under the extraordinary line of coverage for working capital loans in the framework of the crisis caused by COVID-19 that CESCE set up under Royal Decree-Law 8/2020 of 17 March 2020.

The specific risk line for services and financing related to international trade admits the following types of transactions:

- Opening of import documentary credits.
- Financing of imports in euros and foreign currency for payment operations that can be financed.
- Simple export remittances.
- Export documentary remittances.
- Export documentary credits.
- International reverse factoring.

All this financing specifically designed to help companies cope with the difficult situation contains a marked socially sustainable component, as has been evident throughout 2020, in which financing with ESG criteria, especially that which incorporates social criteria, such as helping to support production and business in preserving jobs, has taken on special relevance.

To promote sustainable financing, in its firm commitment to sustainability and the environment, in 2019 Bankia created the Sustainable Business and Financing Division, with a crosscutting focus, bringing together the efforts and initiatives in the bank's different areas, in terms of business strategy, risks and reporting. As a result of this initiative, in 2020 two specific sustainable finance products were launched: Sustainable Leasing for Goods and Facilities, and Sustainable Loan for Business Activity. Bankia offers these products to promote sustainable investing, applying social or environmental criteria, such as the installation of renewable energy solutions (photovoltaic panels, biomass, etc.), investment in more energy-efficient equipment, or renewals of vehicle fleets focusing on sustainable mobility.

In addition to all these COVID financing lines, Bankia, together with its lease partner Alphabet, has supported Spanish companies with the possibility of obtaining a three-month grace period by deferring payment of their instalments over the remainder of the financing period. In this, 21% of the vehicles in Bankia's fleet have benefited from this action.

Digital channel for corporate customers: Bankia Online Empresas

In line with Bankia's reinforcement of the deployment of its digital channels, a major effort has also been made for Bankia Online Empresas to ensure that all corporate customers can carry out their usual transactions and be served and advised at any time by specialised managers. Bankia also constantly monitors all its systems to ensure online operations and customer service by all available means.

As a result of this effort, in 2020 Bankia rolled out a new version of Bankia Online Empresas and all customers were migrated to the new platform.

	2020	2019
No. of Bankia Online Empresas users	180,929	191,190
No. of transactions completed through Bankia Online Empresas ¹	10,555,035	n/a

1. The transactions included are transfers and payments.

The main results of the actions implemented brought significant advantages and solutions to customers, including notably the following:

- The redesign of the main functionalities (initial position, consultation of balances/movements and transfers), making it easier and more intuitive.
- Simplification and automation of user management.
- It is responsive, so it adapts perfectly to any mobile device.
- Predictive search engine.
- Incorporates multi-company at first level.
- Comprehensive management of pending issues, unifying them in a single, always visible and totally proactive space.
- Financial aggregation and payment initiation.
- Direct communication with the manager and Bankia's commercial team.
- Multiple signature of operations.

As a result of this dedication to corporate customers, in 2020 Bankia reached a watermark high in terms of the digitalisation of corporate customers (86.8%), with 78.7% of customers carrying out advanced operations through this channel, such as sending transaction files. Also, in the last months of the year, more than 60% of customers signed their documents and contracts on Bankia Online Empresas, and more than half of the procedures relating to the granting of powers of attorney to customers are now initiated through this channel.

As a result of the work carried out on the new Bankia Online Empresas, in 2020 we earned, quarter after quarter, the highest rating from the independent company Aqmetrix, where a team of independent experts assesses the quality of service provided by financial institutions on their online channels for companies, equivalent to the ratings of financial rating agencies applied to the online banking sector. This rating was achieved as a result of attributes such as:

- Being available whenever our customers need it.
- Maintaining one of the most comprehensive digital offerings in the market.
- Providing service with the speed that customers demand.
- Taking care of our customers when they raise queries at the customer service centre.

INVESTMENT BANKING

Bankia's Corporate Banking unit focuses on business with corporate groups posting consolidated revenue over EUR 300 million, large public institutions (state, autonomous regions and large city councils), and business customers domiciled outside Spain.

This unit offers customers products and services tailored to their needs, centred on investment, structured financing, assistance in transaction and acquisition services, working capital financing, advisory services, and financing solutions in capital markets.

Its activities are carried out under a customer-allocation model with sector-specific specialists (construction of infrastructure, industry, distribution, food and transport, utilities and services, institutions and tourism), in addition to two geographically-focused teams: Catalonia and international customers.

The director of corporate accounts, who specialises in and has extensive knowledge of the sector and companies in the portfolio, is responsible for Bankia's relations with Corporate Banking customers. This director is supported by teams specialising in products, with the overall aim of focusing on the customer and building long-term relationships. Bankia has three Corporate Banking centres in Madrid, Barcelona and Palma de Mallorca, and customers in this business segment are served by 32 Corporate Banking account managers.

Corporate Banking customers can also contact the entity through the online office (Bankia Online Empresas) and the operations management team, which is supported by specialists in the operations of working capital, derivatives, Forex, COMEX, syndicated and other products.

Between February and March 2020 Bankia migrated customers within this business segment based on turnover, incorporating 239 corporate groups with an investment volume of EUR 2,385 million into Corporate Banking.

The decline in ordinary activity due to the economic standstill caused by COVID-19 in the first two quarters of the year was offset by a 28.4% annual increase in new financing, since large companies required significant volumes of liquidity and new debt, in many cases as a preventative measure against the widespread uncertainty generated by the pandemic. Large companies, unlike the rest of the business sector, availed of the ICO guarantee facility far less, instead backing most new transactions with their own corporate guarantees.

At year end EUR 7,328 million in loans (up 19.4%) and EUR 7,390 million in credit facilities (up 38.8%) had been arranged. Reverse factoring lending shows annual growth of 8.7% to EUR 2,996 million and COMEX activity is up 12.9% compared to 2019, totalling EUR 6,909 million.

In 2020 corporate customer deposits (businesses and public entities) amounted to EUR 6,000 million, up 35% during the year, showing a robust liquidity position in this customer segment despite the unique circumstances.

Total lending to Corporate Banking customers at year end was upwards of EUR 22,800 million, 20.2% more than 2019.

In corporate finance, more than 60 syndicated transactions were closed, 40% more than in 2019, mainly for medium and large corporate customers, with the aim of enabling them to undertake new investments and adapt, where appropriate, their financial burden to the environment in which they operate. Financing to provide companies with additional liquidity, especially through ICO-backed loans, also gained importance, accounting for close to 20% of total syndicated transactions.

	2020	2019
Stock of loans granted to Corporate Banking customers (EUR million) ¹	22,843	16,963

1. Gross investment: standard, past-due and non-performing. The 2019 figure was before the migration performed in Q1 20 as part of the Corporates Plan.

Bankia has played a chief role in the consolidation of clean energy financing in Spain in 2020. Through 31 project finance transactions, the bank has financed 3,533 megawatts of this type of energy, making it one of the leading banks in this activity and a point of reference in the sector.

In terms of capital market activity, the bank participated in general in more than 100 syndicated transactions in 2020, maintaining its position as one of the leading banks in Spain in this segment.

It has also participated in infrastructure finance transactions, refinancing roads and using public-private partnerships for a total of EUR 1,089 million.

In acquisition finance, the economic situation arising from the pandemic has reduced the volume of transactions in the market, as social and economic uncertainty has led sponsors to take cautious positions when undertaking new purchases. However, Bankia maintained its position in the market, participating in the structuring of the main deals of the year, which focused on the sectors least affected - or even benefited - by the pandemic, including agriculture, food, technology and telecommunications.

In 2020, the corporate finance teams significantly strengthened the bank's capacity in fixed income, mergers and acquisitions, debt advisory and alternative financing.

In the fixed-income markets, Bankia was bookrunner in 19 private- and public-sector issuers' transactions (a total of 22 tranches), distributing more than EUR 11,000 million of debt among domestic and international institutional investors, ranking it among the main bond placement banks in Spain (in euros) in 2020 (excluding transactions by financial institutions and the Spanish Treasury).

Also noteworthy in the past year was the participation in transactions as large as the inaugural green issue by Red Eléctrica de España; the EUR 1,000 million 10-year issue for Cellnex, Europe's leading wireless telecommunications and audiovisual infrastructure operator; two issues by Amadeus totalling EUR 1,750 million; the return to the markets of large companies in the distribution sector (such as El Corte Inglés, with a EUR 600 million transaction); and Bankia's first participation in a dual-tranche subordinated debt issue for a non-financial company (Iberdrola).

Bank activity also increased with public-sector customers, such as the EUR 1,250 million 10-year issue by the Madrid Autonomous Region. As regards private placements, several sustainable financing transactions were made for customers such as Acciona and the Madrid Autonomous Region.

In the financial advisory area, the mergers and acquisitions (M&A) and alternative financing teams had a very active year, closing four deals in the renewable energies, education, rail transport and infrastructure sectors.

In addition, the debt advisory activity launched in 2019 has closed transactions for more than EUR 50 million in its first full year of activity, and at year-end has actions in progress for a similar amount for 2021.

In real estate finance, Bankia has actively financed residential and non-residential property transactions (shopping centres, offices, student halls of residence, etc.). The strategy of working with the main developers in the residential asset sector in Spain has enabled the bank to finance the construction of more than 4,000 homes in 2020, some of them in projects that are highly significant for their innovative design, such as the Málaga Towers development by the renowned Estudio Lamela, which will serve to reinforce Málaga's status as an international benchmark for the best Spanish architecture.

The financing of several built-to-rent projects aimed at the rental market was also formalised during this period, with Bankia being one of the pioneering lenders in this field in Spain.

In addition, 19 commercial real estate operations were financed in 2020 for a volume of EUR 419 million.

BANKIA ASSET MANAGEMENT

Bankia Asset Management (Bankia AM) is the commercial brand that encompasses Bankia's Asset Management activities, specifically investment funds and open-ended collective investment schemes (SICAVs), delegated management of retail customer portfolios and the management of pension funds and plans in their varied forms.

Bankia Fondos

Within Bankia AM, Bankia Fondos manages investment funds and open-ended collective investment schemes (SICAVs). In addition, it has been delegated management of Bankia Gestión Experta's portfolios.

In general, this type of investment product and service offers four main advantages as catalysts for medium- and long-term investment:

- Possibility to access a broad portfolio of assets, enabling risk diversification.

- Investment decisions are taken by a team of professional managers who have the appropriate tools at their disposal.
- By pooling the savings of many investors, lower transaction costs and better returns can be generated.
- The wide range of products on offer makes it possible to find the product that best suits the needs, expectations and risk profile of each saver.

2020 was marked by volatility, a consequence of the pandemic that is affecting the global economy. Those investors and savers who have been able to remain calm and keep a long-term horizon have been rewarded by a strong market rebound from the lows reached in March.

Overall, the year can be described as a good one in terms of returns, as virtually all asset classes ended the year contributing positive data to the Bankia Fondos portfolios.

Despite geopolitical issues, such as the US elections and Brexit, which have captured investors' attention, what has undoubtedly marked the year is the news related to the development of the pandemic and its impact on the economy. Fortunately, good news on the health front, and a China-led global economic recovery due to take place next year has generally brought relief to markets since March.

Based on the closing figures at the end of December 2020, Bankia managed to surpass the EUR 20,000 million mark in assets under management in funds, after adding EUR 1,260 million in 2020 to close at EUR 20,756 million. In addition, it has managed to end a good year in net inflows after bringing in EUR 1,013 million.

	2020	2019
Total number of investment fund unitholders	367,310	368,692
Volume of assets under management in investment funds (EUR million)	20,756	19,497

With this sound performance, the market share improved by 46 bps in 2020, placing Bankia Fondos at 7.51%, consolidating its position as the fourth national fund manager in Inverco's ranking.

At Bankia, much of this growth is linked to the Bankia Gestión Experta portfolio management service, which accounted for some 70% of our net inflows last year. This service manages customers' assets according through a diversified portfolio of investment funds that adapt to market opportunities at any given time on the basis of their investment profile. Bankia Gestión Experta has four portfolios available: Tranquila (Peace of Mind), Equilibrada (Balanced), Creciente (Growth) and Avanzada (Advanced).

This management model ensures that customers can count on the best Bankia Fondos professionals to manage their portfolio at all times over the life of their investment.

In March 2018 it was launched for marketing through the Bankia branch network, and since then it has progressively become the product/service most in demand by our customers in the field of collective investment. Bankia Gestión Experta is available through Bankia Online and the Bankia mobile app; customers can sign up for the service with a starting investment of EUR 1,000. All other investment products can be tracked by the customer through these channels.

	2020	2019
Net increase in the no. of Bankia Gestión Experta portfolios	10,312	26,215
Volume of assets under management in Bankia Gestión Experta (EUR million)	4,117	3,433

Also, strong returns were achieved by the four Bankia Gestión Experta portfolios: we ended the year with returns of 2.02% for the Cartera Tranquila, 3.71% for the Cartera Equilibrada, 5.52% for the Cartera Creciente and 6.90% for the Cartera Avanzada.

At the end of 2020, Bankia Gestión Experta had assets of EUR 4,117 million and 90,813 portfolios.

Socially Responsible Investing (SRI) according to environmental, social and governance (ESG) criteria is another area of collective investment to which Bankia Fondos is strongly committed. SRI embraces ethical, social and environmental criteria within the decision-making process, supplementing the traditional financial criteria of liquidity, return and risk.

As part of Bankia's commitment to the Sustainable Development Goals, its adherence to the Principles for Responsible Banking and the United Nations' Collective Commitment to Climate Action and in order to expand Bankia's catalogue of socially- and environmentally-focused products with a social and environmental focus, a new investment fund was launched in September 2020: Bankia Index Clima Mundial. This is a new ethical equity fund which, alongside the Bankia Futuro Sostenible, Bankia Mixto Futuro Sostenible and Bankia Garantizado Valores Responsables investment funds, expands Bankia's catalogue of socially- and environmentally-focused products.

Investment product	2020		2019	
	Assets (EUR million)	No. of unitholders	Assets (EUR million)	No. of unitholders
Bankia Futuro Sostenible	78.38	3,629	26.64	1,681
Bankia Mixto Futuro Sostenible	74.89	2,929	12.89	584
Bankia Garantizado Valores Responsables	146.32	6,174	148.74	6,395
Bankia Index Clima Mundial	3	228	--	--

Another milestone in this area was Bankia AM's adherence to the Principles for Responsible Investment (PRI). Promoted by the United Nations, the PRI is an initiative consisting of a network of investors working together to disseminate the implications of sustainability and supporting signatories to include these considerations into their investment decision-making processes and practices.

Signing these internationally recognised principles enables organisations to publicly demonstrate their commitment to responsible investment and be part of a growing global community that is making a real change to contribute to a better world for all. More than 3,000 companies from over 60 countries globally have already shown their commitment by subscribing the PRI.

In addition, adherence to the PRI reinforces Bankia's clear commitment to improving its ESG positioning, both in the area of asset management and in the Bank's other business areas.

Looking ahead to next year, Bankia Fondos will continue to manage its portfolios by seeking to take advantage of any investment opportunity that may arise, but always under the premises of prudence and risk control.

In this scenario, it will continue to focus on improving the products and services offered to customers, focusing on the three areas that are considered fundamental in the current environment:

- The portfolio management service.
- Strengthening investment under ESG criteria, in line with Bankia's commitment to all aspects related to the application of ESG criteria.
- Having the right tools to help customers choose the most appropriate products and services.

Bankia Pensiones

Bankia Pensiones manages assets worth EUR 8,388 million across individual, employer and associated pension plans to preserve and increase retirement savings.

	2020	2019
Total number of pension plan unitholders	847,996	856,141
Volume of assets under management in pension plans (EUR million)	8,388	8,243

2020 was marked by a serious health crisis that caused global growth to plunge. In this difficult environment it is worth noting the solid performance of the pension plans managed by Bankia Pensiones. Most of the plans ended the year with positive annual returns, showing great resilience after the sharp falls in the financial markets in the first quarter of the year.

At 31 December 2020, our market share in individual pension plans was 7.91%.

Bankia Pensiones has a wide range of plans that can be tailored to all time horizons and investment profiles.

Launched in 2019 with the aim of expanding the range of savings products, the VIVE plans (Bankia Soy de los 60, Bankia Soy de los 70 and Bankia Soy de los 80) have successfully completed their first year of life. These life-cycle pension plans, which offer customers a financial solution adapted to their age by adjusting the risk of the portfolio as the customer's retirement age approaches, have achieved positive returns for unitholders in such a difficult year as 2020. The VIVE plans have captured the interest of customers since their launch, as evidenced by the more than EUR 175 million in assets managed by the three plans.

VIVE plans	2020	
	Assets (EUR million)	No. of unitholders
Bankia Soy de los 60	111.9	9,448
Bankia Soy de los 70	54.2	8,336
Bankia Soy de los 80	10.7	4,078

Fund capture in individual plans was driven forward by the launch of two guaranteed pension plans with total assets of EUR 40 million.

Since 2018, Bankia Pensiones has had an SRI Policy in place that applies to all products and assets managed by us. This commitment to SRI was reinforced in 2020.

Bankia AM and the Bankia Group Employees' Fund signed the United Nations Principles for Responsible Investment, thereby joining the list of signatories to the UNPRI.

In 2020, the ESG Coordination Committee was given greater content and renamed the Sustainability Committee (CSBAM), involving all areas of the company.

The number of funds invested under ESG criteria also increased last year, as the Life Cycle pension funds (Bankia Soy de los 60, Bankia Soy de los 70 and Bankia Soy de los 80) and the profiled pension funds (PP Jubilación, PP Cauto, PP Moderado, BBP Moderado, PP Flexible and PP Dinámico) were incorporated into the management strategy with ESG criteria.

Commitment to responsible management

The asset management business plays a key role in channelling capital flows to sectors and companies that contribute to a more sustainable economy, from an environmental and social point of view. Bankia Asset Management (Bankia AM) remains committed to SRI and continues to work to integrate non-financial criteria with investment decisions and risk management, upholding its key objectives of fighting climate change and attaining the United Nations SDGs.

This commitment is reinforced by adherence to international corporate social responsibility initiatives. Bankia AM and the Bankia Group Employees' Fund signed the United Nations Principles for Responsible Investment in 2020, thereby joining the list of signatories to the UNPRI.

Given the importance of responsible management for Bankia AM, this point was included in the fund manager's Strategic Plan in 2019 as one of the key projects to be undertaken. Thus, given the scope and complexity of this project, it was decided to select a consultant with extensive experience who has supported us in the process of transformation towards an integrated model of sustainable management: governance, non-financial risk management (ESG criteria) and the development of investment solutions.

Thus, once the positioning of the fund managers had been decided, in 2020 the ESG Coordination Committee was given greater content and renamed the Sustainability Committee (CSBAM), involving all areas of the asset management business so that decisions cut across the entire bank.

The aim of the committee is to lead Bankia AM's transformation from more traditional management towards the incorporation of sustainability criteria in investments, product strategy and commercial strategy.

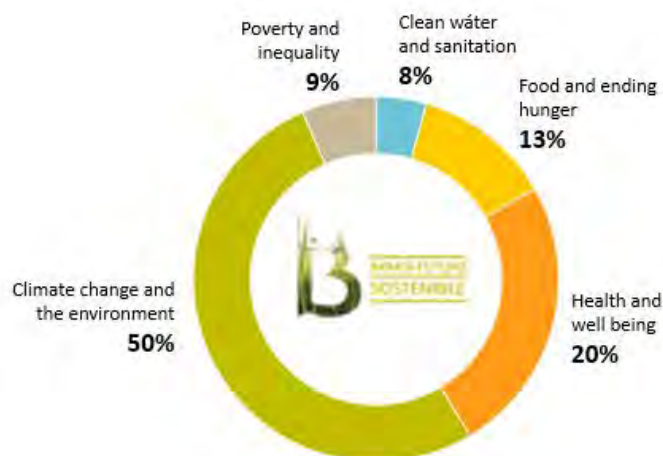
In the first stage, five specific sub-committees and a regulatory support group have been created to address each of the objectives to be achieved in relation to the integration of sustainability at Bankia AM. The CSBAM is fed by the conclusions and proposals that emerge from each of them.

It meets every fortnight, although the Sustainability Committee may be convened whenever it is necessary to deal with any issue important enough to be dealt with immediately.

Bankia AM is serious about its ability to influence decision-making at the companies we invest in. We use our voting power and direct contact to set up an active dialogue and raise the profile of our investees' ESG practices. Therefore, it is widening its frame of action in proxy voting beyond statutory requirements. It also seeks engagement with companies and their management teams to influence their decision-making in the ESG domains.

Regulatory changes are driving financial institutions – and asset managers specifically – to consider non-financial risks as a further element of the risk-return dichotomy within investment decision-making.

Bankia AM is aware that more and more investors are considering SRI as a key element when selecting products to invest in. Accordingly, the bank has launched the Bankia Futuro Sostenible range of products, providing its customers with responsible and innovative investment solutions. Thus, in 2017 the first Spanish fund was launched that invests in liquid assets with an impact on the Sustainable Development Goals (SDGs), given that its 5 selected goals (clean water and sanitation, food and the fight against hunger, health and well-being, climate change and the environment, and poverty and inequality) correspond to 9 of the 17 SDGs. The Bankia Futuro Sostenible equity fund now has more than EUR 78 million in assets.



In 2019 the first impact report was sent to fund unitholders and in 2020 the first impact report of a socially responsible fund was published on the bankia.com corporate website, analysing the following aspects of these five goals:

- Reduction of CO₂ emissions generated by portfolio companies compared to the previous year.
- Reduction of energy consumption.
- Reduced water consumption.
- Use of renewable energies.
- R&D expenditure relating to the environment.

- Number of hours for employee training.
- Gender diversity.

After this impact fund, the range was complemented with the launch of a mixed fund for customers with a more conservative profile: Bankia Mixto Futuro Sostenible, which has almost EUR 75 million in assets. In addition to investing in equities, the portfolio includes social impact bonds, green bonds, sovereign bonds and bonds of companies with a positive impact on the objectives set.

In 2019, it also launched Bankia Valores Responsables, which guarantees 100% of the investment at maturity plus a payout of 0.15% annually, in addition to the upside potential of a basket of equities from sustainable companies selected under the "best in class" criterion.

In 2020, the Bankia World Climate Index fund was launched, the management goal of which is to replicate the MSCI World Climate Change index (net return USD Index), which is made up of approximately 1,570 large and mid-cap companies from 23 developed countries, applying, through the replication of the index, financial and non-financial SRI criteria focused on the fight against climate change, with a maximum deviation from the index of 5% per year.

The assets of the pension funds that invest taking into account ESG criteria increased considerably in 2020, as the Life Cycle pension funds (Bankia Soy de los 60, Bankia Soy de los 70 and Bankia Soy de los 80) and the profiled pension funds (PP Jubilación, PP Cauto, PP Moderado, BBP Moderado, PP Flexible and PP Dinámico) were incorporated into this management strategy. In total, the equity under management through these products amounted to more than EUR 6,100 million, 72% of the assets under management being covered by ESG criteria.

	2020	2019
Volume of assets managed under SRI criteria (EUR million)	4,408	880

Bankia AM remains committed to increasing assets under management under ESG criteria and is currently in the process of transforming the Bankia Evolución range, which will increase assets under management with ESG criteria by EUR 1,200 million in the near future.

The firm objective of investing in socially responsible products is to create value for investors, society and the environment, and to do so with a commitment to sustainability and a vision of the future.

Bankia Fondos made Citywire's Avant-gardist list as one of the 36 most advanced fund management firms in applying ESG criteria, mainly as a result of pioneering our Bankia Futuro Sostenible fund.

Also, since it is one of the basic pillars for Bankia AM, and in line with compliance with the rules of conduct (resources and experience) and the fiduciary duty of the management firm, and taking into account the cross-cutting scope of socially responsible investing, a training plan was introduced to gradually certify our experts to the ESG analyst standard by EFFAS (CESGA), mainly focusing on the risk and investment management teams, and to plan more general internal ESG training for other employees.

Thus, since 2018, 18 people have obtained the CESGA accreditation and one person the Certificate in ESG Investing (CFA Society United Kingdom), as ESG analysts. In addition, there are seven more people who are in the process of obtaining it at the end of 2020.

At the same time, and as has been the case since 2018, Bankia AM actively participates in Inverco in the ESG working group with the rest of the asset management industry.

Improving management, integration and performance to progress in the appropriate treatment of non-financial risks during investment decision making requires constant evolution and, accordingly, the next challenges to be faced in 2020 and 2021 are:

- The definition of an integration methodology and exclusion policies.
- Adaptation to existing regulations.

- Updating internal policies and procedures: proxy voting and engagement or remuneration policy.
- Expansion of strategies and range of products with ESG criteria.
- The launch of new socially responsible products.

BANCASSURANCE

As a strategic line of the insurance business, Bankia has a bancassurance division that sells life and general insurance and provides specialised support to the bank's network in the areas of risks to individuals (life, home, motor, health and savings) and businesses (commercial, credit insurance, public liability and multi-risk).

In 2020, various actions were carried out to provide the branch network with products and tools suitable for marketing insurance, including improvements in home insurance marketing systems, the launch of personal and mortgage payment protection insurance, the development of portfolio retention platforms and the redesign of life insurance processes.

In addition, in 2020 processes were launched on Bankia Online to take out home insurance (also in the Bankia App in this branch) and life insurance associated with personal loans, so that customers can simulate and arrange their insurance directly using Bankia's various marketing channels.

In 2020, priorities focus on increasing insurance by penetration leveraging Bankia customer loyalty, embracing individuals and businesses; continuous improvement in commercial dynamics; enhancing online insurance sign-ups; and bolstering commercial tools and actions to increase Bankia employee productivity in this area.

As for the performance of the insurance business in 2020, net premiums issued came to EUR 508 million, thanks mainly to the performance of home and health insurance (new policies, 25% in home and 46% in health, compared to new policies in 2019).

Notable are the measures implemented to improve portfolio retention: specialised platforms with the support of the various insurance partners, which has led to an improvement in the moving annual total (MAT), which is the sum of the sales over the twelve months prior to the period in which it was calculated, in the portfolio decline in number of policies, with portfolio retention standing at 85.4% at the end of 2020.

At 31 December 2020, there were more than 2.4 million policies in force and mathematical provisions for life savings insurance amounted to EUR 5,322 million.

Bancassurance's contribution in direct commissions from the insurance business amounted to EUR 121 million in 2020.

	2020	2019
Number of bancassurance risk and savings customers	1,556,407	1,605,286
Total number of risk and savings policies in force	2,434,626	2,576,529
Net premiums issued (EUR million)	507	530

REAL ESTATE

Bankia's real estate disposal programme's main goal is to obtain the highest possible return, clean up the balance sheet and support our share price, in accordance with regulators' requirements.

This requires extensive knowledge of the sector and professionalised management, and to meet this need in an optimal and efficient manner all of Bankia's repossessed assets are managed and marketed through Haya Real Estate, which is responsible for technical maintenance and all commercial activities, such as customer service, dealing with brokers, presence at events, publication of offers, etc.

Within Bankia's structure, since its creation in May 2016, the mission of the Real Estate Management Department is to assume the tasks of Haya Real Estate's control layer, which consists of:

- Overseeing compliance with the management contract signed by Bankia and Haya Real Estate.
- Reducing the balance committed in the strategic plans for distressed assets with a minimum impact on the income statement.
- Coordinating sales and preparing packages of assets that can be placed outside the retail circuit.

To this end, the quality of the information available has been improved, making the stock more transparent, and there is collaboration with other areas of the bank to speed up the sale of new foreclosed real estate assets (especially with the Retail Network Division), providing information and helping branches in the commercial process of the sale of foreclosed assets, as well as with the other groups of the Deputy General Directorate of Credit Risk that are involved in the various processes of foreclosed real estate assets.

At 31 December 2020, this business had brought in more than EUR 225 million for Bankia, with the sale of 2,025 properties, including approximately 1,480 housing units. Unlike previous years, no wholesale portfolios were sold this year and retail sales suffered due to the macro situation in the real estate market caused by COVID-19.

	2020	2019
Total no. of real estate assets sold	2,025	9,946
No. of real estate assets sold that are homes	1,478	7,399
Volume of real estate asset sales (EUR million)	225.5	808

c) Innovation and digitalisation

The development of new technologies in various areas of knowledge is having a positive impact on society thanks to their applications in a wide range of domains. So much so that their application is spreading at a breakneck pace, from the treatment of crops to the field of medicine, where some tech-driven improvements are already implemented successfully.

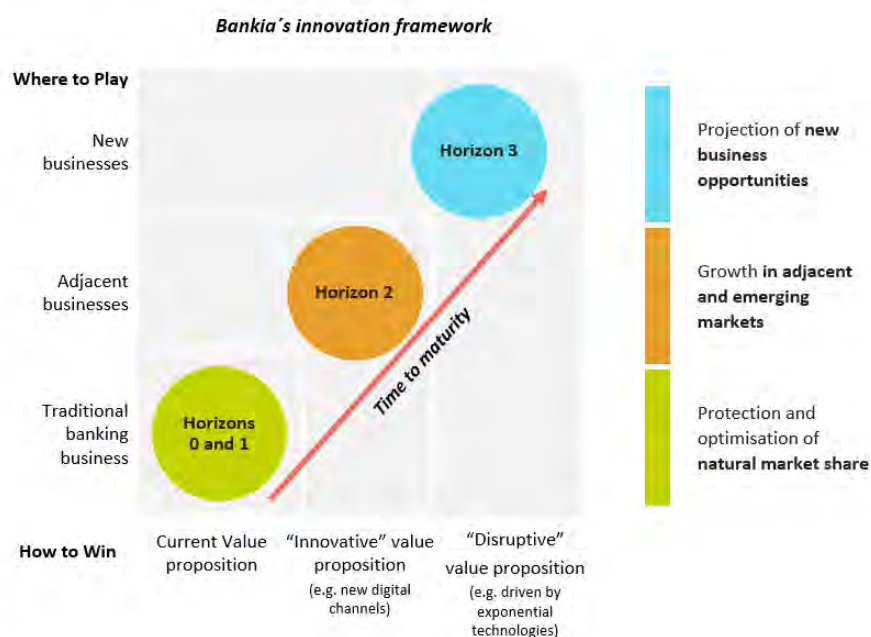
Innovation has therefore become a driver for change towards a more digital world, the so-called digital transformation. In turn, knowledge can be shared more easily and the intervals for updating knowledge are becoming shorter and shorter. In this context, Bankia continues to make progress in the development and sharing of innovation.

Bankia's innovation mission

Bankia's innovation mission is to catalyse new opportunities in the environment and develop new business models, support and accompany the organisation in its strategic priorities and challenges, encouraging innovation to be put into practice at all levels of the organisation and acting as a vehicle for cultural change.

Consequently, the philosophy of innovation in Bankia revolves around three pillars:

- "Open innovation". Identifying trends in the environment, analysing new players, creating alliances with third parties, and developing proofs of concept.
- "Innovation aligned with business". Understanding the business needs, defining strategic challenges, and developing projects in collaboration with the other areas of the organisation.
- "Innovation as business as usual and a culture". Enabling the entity to put innovation into practice in the day-to-day activity of all areas in the organisation through the sharing of best practice and knowledge.



Bankia's innovation model

The innovation model in Bankia is underpinned by seven key components, from three different domains, to undertake its agenda:

A. Strategy and knowledge

1. Innovation Observatory. A team dedicated to the definition and coordination of the entity's innovation strategy, the generation of knowledge, the evaluation of trends in the environment, and the execution of projects.

Since 2016 more than 20 reports of note have been generated and over 100 lines of action have been identified, in addition to the creation of the Bankia Fintech accelerator.

Bankia's innovation agenda aims to address the strategic challenges outlined by the Innovation Observatory, which provides the vision of the environment required to define the challenges, and the Management Committee, which provides the bank's vision.

B. Ecosystems

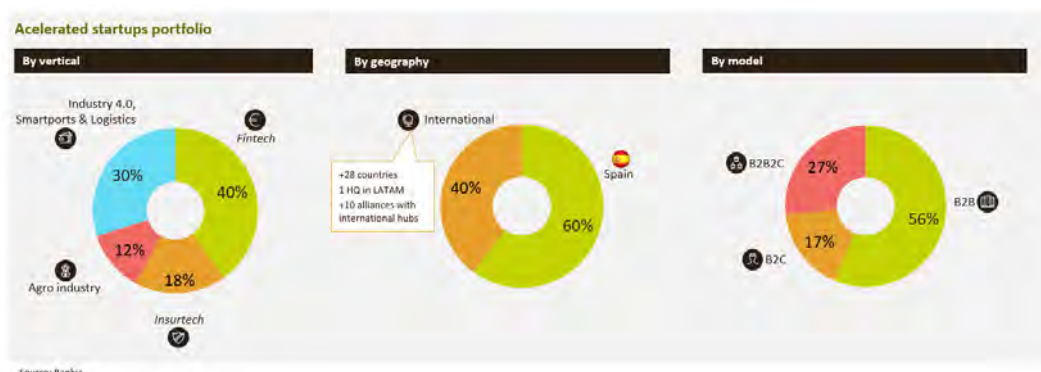
2. Bankia Fintech by Innsomnia. Startup accelerator and company digitaliser whose main objectives include capturing and generating value through open innovation, developing proofs of concept and taking up a position in the entrepreneurial ecosystem as a nexus between startups and SMEs.

The Bankia Fintech by Innsomnia programme is arranged around a series of strategic challenges which stretch across different fields and verticals (open banking, cyber security, cryptocurrency, regtech, insurtech, customer relationships, etc.).

In the fourth quarter of 2020 Bankia Fintech opened its sixth call for submissions, adding two new areas to the challenges to cover: contribution to the sustainable development goals (SDGs) and future of health, accommodating the current health crisis triggered by the COVID-19 pandemic. More than 200 submissions were made in this call, from Spain and abroad.

Since the programme was launched in 2016, over 750 submissions have been made to Bankia Fintech by Innsomnia and over 65 projects have been accelerated in the first five editions, spanning more than 20 different verticals (business challenges).

Furthermore, its impact transcends borders, with headquarters in Latin America, over 10 alliances with international hubs and more than 20% of international startups selected from upwards of 28 different countries.



- Bankia Fintech – Venture. This trading company was set up as a vehicle for investment in ecosystems through which more than EUR 20 million will be invested over five years from 2020. It is an investment fund created specially by Bankia to accelerate fintech projects developed by startups and scaleups. The fund's target verticals include startups in the realms of fintech, proptech, insurtech, legaltech, data analytics, regtech, cyber security and financial operations and intermediation.

In 2020 five investments were made in investees, three of which come from the Bankia Fintech programme.

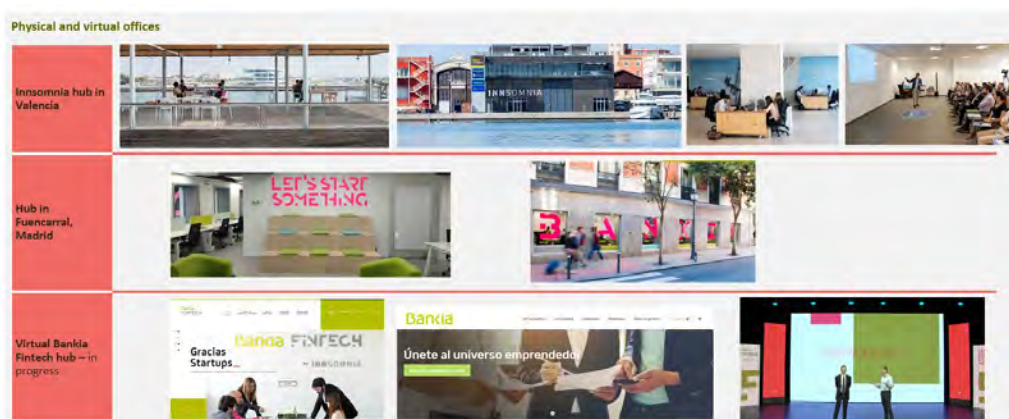
- Alliances and agreements with third parties. These comprise agreements and alliances generated with players in the tech and entrepreneurial ecosystem with the aim of developing and commercialising new solutions and increasing Bankia's intellectual property, such as Alastria, Niuron and Iberpay.

C. Spaces

- Physical and virtual offices of Bankia Fintech which we have designed to provide working and training areas for members of Bankia Fintech (e.g. Innsomnia, Venture) and strengthen Bankia's collaboration and positioning in the entrepreneurial ecosystem.

These offices are: the Innsomnia Hub in Valencia and the Hub in Fuencarral, Madrid, encompassing over 4,000 m² dedicated to the startup ecosystem, with co-working areas, private meeting and training rooms, and spaces for Bankia events and networking.

Due to the current situation caused by the COVID-19 pandemic, a new virtual office is being implemented (www.bankiafintech.com), allowing virtual events to be organised such as "Partners Day 2020", the event which closed the fifth call. This virtual office can be used to hold videoconferences and virtual meetings, access training and mentoring, follow the development of proofs of concept online, and access the Bankia Fintech ecosystem.



D. New ways of working

6. Fast-track. This is a new process for innovation proof of concept (PoC) based on the agile management methodology, which optimises internal procedures and speeds up the testing of the viability of new products and services.

The creation of this procedure, which was agreed upon with the supervisor, has enabled Bankia to cut the time frame for evaluating and approving innovation proofs of concept from six months to six weeks at most.

7. Sector-specific sandbox. A regulatory sandbox is a testing ground for experimentation with new business models which do not yet have a clear regulatory framework. These regulatory instruments, which have already been successfully implemented in countries such as the United Kingdom, allow entities to run tests with new technologies that do not yet have specific legislative oversight by regulators.

The regulatory sandbox creation project for fintech in Spain was approved by the Spanish Parliament in November 2020. The launch of this sandbox will allow entities to test out fintech projects for which it is unclear how to apply the regulatory framework or which do not yet have their own regulatory framework. Bankia is working on the presentation of sandbox initiatives.

Value generated by innovation in Bankia

Bankia's innovation is crystallised through projects and lines of action in six areas:

1. Product, service and risk models which foster innovation and the adoption of new business and operating models in the different banking verticals, particularly segments / areas of strategic importance to Bankia, such as business banking and risk management.
2. New channels to drive digitalisation and user experience, offering our services through channels that customers already use but in which we are not present, and exploring opportunities in new channels emerging but which as yet do not show a clear adoption by users.
3. Sustainability. Accompanying Bankia in its mission to promote the sustainable development goals (SDGs) and lead the way in sustainability and responsible management through the development of "green solutions" and the driving of innovation in strategic sectors such as the agro industry.
4. Research into artificial intelligence. Researching and developing the latest breakthroughs in artificial intelligence (AI) allows us to tailor them to specific solutions in different use cases, particularly in relation to natural language generation (NLG) and other exponential technologies such as quantum computing.
5. Data-centric. Researching and testing new tech solutions in order to evolve the bank's main business, cutting costs and increasing our capacity to offer new products and services.
6. DLT-based business models. Seizing opportunities provided by blockchain technology as regards the development of new solutions, notably the tokenisation of assets, digital identity management, and the platformisation of business processes.

Bankia, the first Spanish bank with an official WhatsApp account

After being the first bank in Spain to open an official WhatsApp account, in 2020 Bankia expanded its services offered through this channel.

Any user, customer or not, can contact Bankia via WhatsApp and chat directly with the bank's points of contact. Bankia's profile bears the official WhatsApp verification icon, which reassures all users contacting the bank via this channel.

The service combines personalised attention on the part of agents, who have received specific training to chat with users via this channel, and automated replies to respond to users 24/7 using natural language processing.

WhatsApp was initially used to respond to doubts and queries regarding mortgage products only, but in 2020 the service was expanded to answer questions about all personal loans offered by Bankia. Bankia has also created a new official communication channel within the private banking segment using the official WhatsApp account, which has been developed based on a proof of concept carried out within the Bankia Fintech innovation programme. This has helped facilitate remote relationships and personalised attention, which have been essential in 2020.

In 2020 a total of 4,416 queries were received via WhatsApp from customers and non-customers, generating 35,804 interactions in this channel. The availability of this channel was not reported openly until November 2020, which led to a notable uptick in traffic. For instance, 1,652 queries have already been received in January 2021 alone, with 12,105 interactions.

The goal is to expand customer service via this channel to a greater range of products and services, given the excellent reviews from users of this service, who have given the interactions with Bankia a rating of 9/10 since launch.

Talk to Bankia using Google Assistant

Bankia adapts and uses natural language processing technology to transcribe what the user is saying into text in order to simplify direct communication with the customer. Using Google Assistant, customers can communicate and be understood to obtain the best answers to their questions, also in natural language, using artificial intelligence.

This service, available to any user, including non-customers, initially allowed you to locate branches and cash machines nearby or at a certain address or location simply by asking Bankia via Google Assistant, even linking to Google Maps to show directions.

In 2020 further developments have been made to Bankia's virtual assistant using Google Assistant to address new user queries. The main enhancements, envisaged to go live at the start of 2021, include the application of a new natural language processing system which can understand far more questions and offer users a wider range of information, while also enabling the assistant to be retrained faster and more efficiently in the event of data changes, as well as increasing interaction between the assistant and other official Bankia channels. The overriding objective is to maintain the highest Google Assistant rating among Spanish banks.

Innovative artificial intelligence models

In 2020 Bankia has continued to develop new innovative artificial intelligence models, making huge strides forward in the processing of documents with highly unstructured presentations and formats, such as the different invoices managed internally in the bank. Breakthroughs have been made in table detection and recognition, as well as the semantic association of visual element-based concepts (unanswered questions in both the academic world and big tech), using cutting-edge AI models that require very sophisticated learning, adaptation and optimisation techniques for each use case. This research initiative received financing from the European Union's Horizon 2020 Research and Innovation Programme through the Infinitech 2020 Consortium.

Bankia works to reduce CO₂ emissions

The Directorate of Innovation ran several initiatives relating to the SDGs as part of Bankia's commitment to improve society and the environment: the highlight was a platform in support of reducing greenhouse gas (GHG) emissions.

In partnership with Aenor and Everis Ingeniería, the bank unveiled a project at the UN climate change conference (COP25) in Madrid to create a national carbon credit generation and trading exchange. Bankia's contribution to the project is its Stockmind asset tokenisation platform, which uses blockchain technology to create an incorruptible ledger that prevents double counting of GHG emission reductions, thus providing transparency to the process of trading and offsetting verified credits.

Thanks to this innovative project, Bankia continues to form part of the World Bank's advisory group, which aims to lay the foundations for an international voluntary market in carbon credits. Bankia has put its

Stockmind platform forward as one of the first use cases to be implemented within the World Bank's platform, which remains under consideration.

In 2020 progress has been made on building the platform and it has been agreed with Everis and Aenor to build an MVP based on a specific type of project (photovoltaic energy), with the aim of incorporating other types in the future (waste management, mobility, forestry, etc.), with completion expected in the first quarter of 2021.

The project has also been selected for submission to the first sector-specific sandbox call in Spain, which is expected to be opened in the first quarter of 2021.

TRANSFORMATION AND DIGITAL STRATEGY

The goals of Bankia's digital transformation are twofold: firstly, provide an excellent service to our customers, increasing capacities so that our customers can carry out all their operations via digital channels (app and website), offering products or services that best fit their needs (through machine learning techniques and advanced modelling using big data platforms), and providing personal advice (through account managers and advisors from the business networks) which strengthens and brings consistency to the ensemble of services we render via all channels; and secondly, ensure an efficient operating model through the implementation of new technologies and designs in operational processes, organisational structures and operating models.

Digital channels



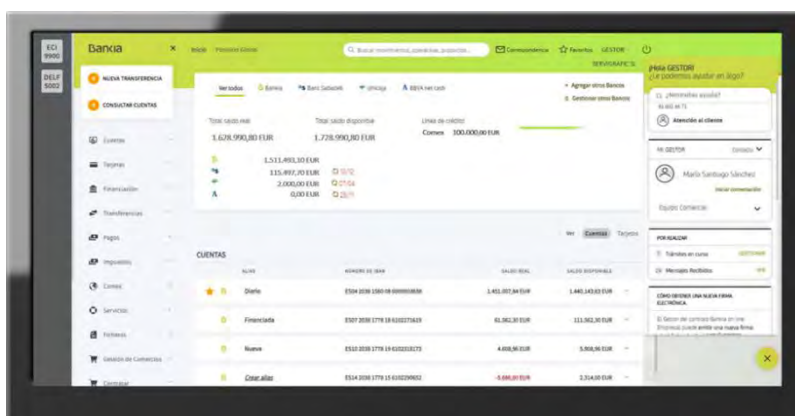
In the summer of 2020 the new Bankia app was launched. It is one of the best apps in the sector as the entity focused on maintaining a simple structure that is easy to navigate, but provides customers with all the bank's capabilities. The new app gives customers an experience which makes their day-to-day operations easier while also being more geared towards marketing the bank's products.

The new app allows customers to see the positions of all their products at a glance on the home page, including the most recent account and card movements. The entity has endeavoured to make access quicker, and the most commonly used processes have been simplified and optimised so that operations such as Bizum and transfers can be carried out in a matter of seconds with just two clicks from the global position.

The steps to arrange new products or services have been completely redesigned to provide a digital experience comparable to other sectors in terms of speed and simplicity, while complying with regulatory and security aspects.



A new online banking for business has been launched to provide another work tool for customers, improving user experience and simplifying the main operations.



Aqmetrix (leading digital banking market research which compares the competition), ranks Bankia's channels as the best in the sector in the past year.



Customer processes

One of the main objectives in recent years has been to raise efficiency in the business processes and increase the products and services offered in digital channels.

- The digital onboarding process has been overhauled, improving the process for registering new customers through the public website and using a video identification system to increase security and speed, which benefitted some 50,000 customers in 2020.
- The *Préstamo ON* (loan) and *Hipoteca ON* (mortgage) products have been launched for all customers and can be arranged completely via digital channels, significantly cutting down on process times. Over 1,300 transactions were arranged under these digital products in 2020.
- Managing customers' investments is easier now.
 - The global investment position provides an aggregated overview of all the customer's investment products and their performance.
 - Investment and savings simulators, available on the digital channels, help customers make decisions.
 - Managed portfolios can be arranged via digital channels as Bankia Gestión Experta is available on the website and the Bankia app, with more than 30,000 portfolios opened during the year.
- Insurance offerings available on digital channels have been expanded, including the simulation and arrangement of home and car insurance, as well as the linking of life insurance to financial transactions carried out on the website and the Bankia app.
- The new digital guarantee has given business customers the possibility of requesting, submitting and consulting guarantees 100% online, with no need to visit a branch, thus increasing efficiency and security, which is of particular importance in light of the current healthcare crisis.
- Bankia has redesigned the personal finance manager (PFM) to enrich the information on customers' positions and offer a raft of predictions to help their decision-making regarding expenses and savings. This, alongside the option of adding their accounts with other entities through the financial aggregator, allows customers to manage all their family finances in one place via Bankia's digital channels.
- As regards digital sales, customers have access to Bankia Shop, an online sales portal with a wide range of top brands offered at competitive prices with 0% APR financing. Since June 2020 more than 143,000 users have accessed Bankia Shop and around 38,100 customers have registered.



In recent years the entity has analysed the main transactional operations performed by customers in branches and has made significant efforts to make them available on digital channels, such as the payment of bills and taxes or the issue of certificates; thereby cutting down on the admin tasks of branch account managers, freeing them up for marketing and advisory work.

Bianka chatbot

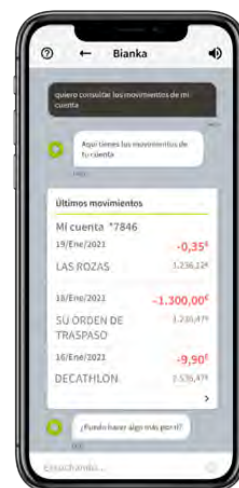
Bianka is one of the most modern and complete chatbots in the sector. It enables our customers and employees to carry out transactions and make queries using simple colloquial language.



Its huge knowledge base, developed through exhaustive training and learning from the thousands of interactions performed since its roll-out, as well as its ability to connect to the bank's main operational systems, make Bianka a powerful tool which, built into the Bankia app and telephone assistance channels for customers and employees, simplifies and humanises the use of technology.

Bianka currently provides assistance via the following functionalities:

- Make payments via Bizum.
- Make transfers.
- Consult account movements and alerts (salary payments, transfers received, warnings of balances under EUR 100, etc.).
- Consult recent movements or search for specific types of account movements.
- Consult account balances.
- Consult bills paid.
- Consult general product and service information.

Big Data

As regards customer experience, Bankia has continued the customer journey development started in 2019, whereby contact is made with customers when they so require via the channel best suited to each occasion. Significant progress has also been made in channel intelligence, allowing us to understand customer behaviour, better analyse the relationship processes and, as a result, improve their experience.



On the personalisation front, customer profiles have been built based on their income and expenses to understand their financial patterns. The entity performs predictive analysis on these patterns to provide customers with recommendations and relevant information on their financial performance.

Bankia has undertaken transformation initiatives using pioneering machine learning techniques, notably the identification of relationships between businesses and account managers, analysing collection and payment

transactions to improve the acquisition of new customers.

Considerable headway has also been made in recovery management based on customer profiles, increasing debt recoveries and making the process more cost-efficient.

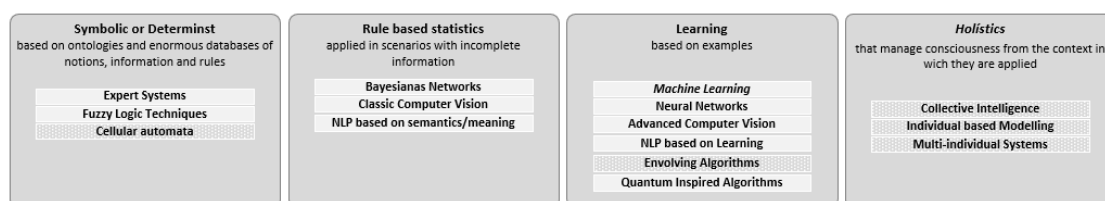
Artificial intelligence

With the aim of ensuring an efficient operating model, the entity has reached notable milestones such as the complete digitalisation of the lending process through the incorporation of artificial intelligence in manual tasks (document validation and recording of financial information), which enables us to move the process to the digital channels, with substantially lower costs and customer response times.

This intelligent system has been developed on a micro-agent, cloud-ready platform based on autonomous micro-services communicated by events with serverless functions.

The platform has built-in state-of-the-art artificial intelligence (with Bankia intellectual property), including quantum physics-based algorithms for the resolution of complex problems. This platform combines different techniques to generate the following cognitive abilities:

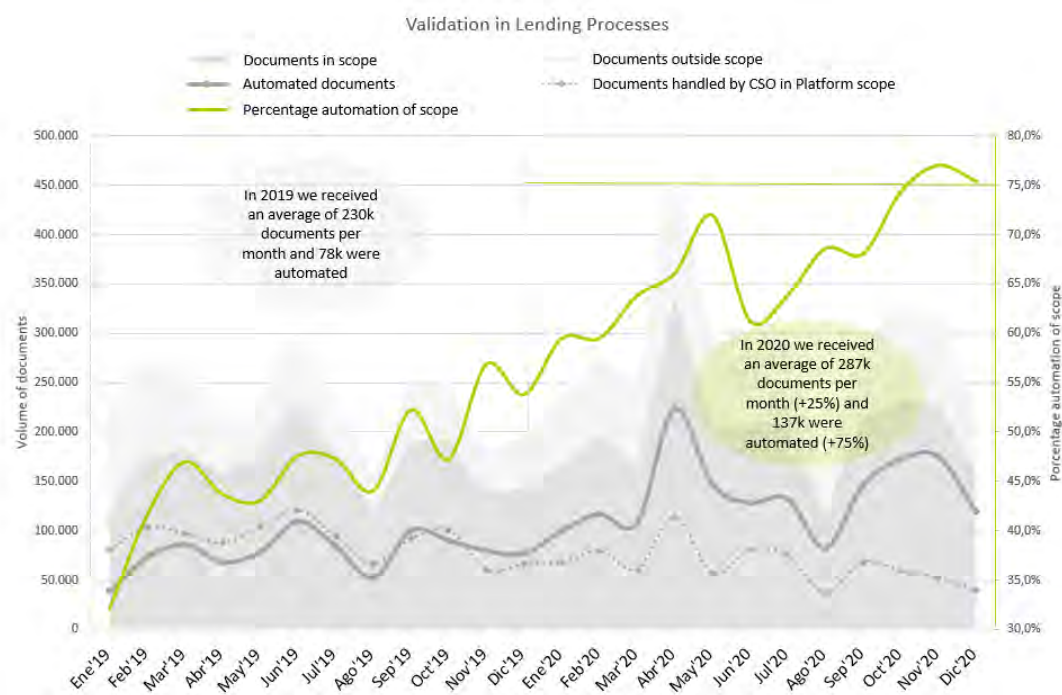
- Perception: ability to transform and interpret unstructured information.
- Knowledge: ability to use information learned from experience and context to improve perception capacities.
- Reasoning: ability to solve problems, draw conclusions and consciously learn from events, establishing causal and logical connections between events.



The platform is designed to automatically process tasks with accuracy rates over 98% and to help agents when it detects situations falling below the required confidence threshold.

The platform permits the “Document validation” task to be executed automatically and autonomously, assessing the suitability of the 17 types of documents provided by customers during the lending process in accordance with document quality guides.

An average monthly volume of 137,000 documents was processed automatically in 2020, reaching an automation level in the last quarter of 53% of the total documents validated in lending operations.



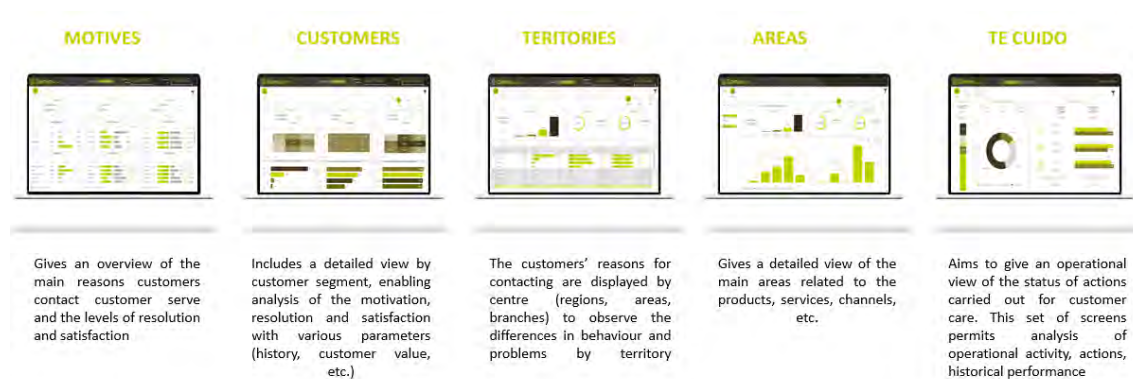
The platform also automatically and autonomously executes the “Recording and confirmation of financial information” task for lending operations of individuals, adding the information provided by customers to the financial terminal.

On this front, within its scope the platform has achieved a level of 28% of complete automated recordings, generating time savings for document recording processors of more than 55%.

Another important milestone in this respect is the creation of an autonomous system to understand customers, driven by artificial intelligence (NLP on a dedicated platform), which allows all conversations with our customers (calls, chat, email) to be analysed in a consistent manner, resolving situations of dissatisfaction and improving our remote processes, products and channels. This all results in better customer care with systematic, personalised attention.

This system is capable of detecting the motivation behind customer interactions, inferring the implicit satisfaction of the conversation, and ascertaining whether the customer’s request has been fully resolved.

All this information is generated on a daily basis and governed in a “Customer Care” monitor.



Technological Enablers

Bankia’s digital transformation is underpinned by cloud-based technology, which allows information to be processed in a more secure, scalable and efficient manner compared to traditional technologies. Bankia currently has a hybrid cloud made up of thousands of processing nodes that integrate with the main public cloud providers in the market.

The combination of cloud technology with modern Kubernetes architecture (open-source container-orchestration system for automating computer application deployment, scaling, and management) and DevSecOps procedures (integration of security into software development and IT operations) facilitates the roll-out of new functionalities and services, with greater cost flexibility under pay-per-use models.

d) Accessibility and financial inclusion

EASE OF ACCESS TO BANKING SERVICES

In 2020 Bankia served approximately 250,000 people living in 374 municipalities at risk of financial exclusion through the ofibus service. This unique service offered by Bankia comprises mobile branches that allow users, including non-customers, to carry out typical banking transactions. More than 200,000 transactions were performed via these mobile branches in 2020.

Bankia’s 14 ofibuses cover almost 43,000 kilometres per month, even during the state of emergency decreed as a result of the COVID-19 pandemic, and have continued to operate in six autonomous regions: Madrid, Valencia, Castilla y León, Castilla-La Mancha, La Rioja and Andalusia.

These mobile branches have preserved their purpose of providing a means for rendering essential services during the pandemic and Bankia managers have maintained the same level of citizen assistance in all municipalities as that offered before the state of emergency, in the provinces of Madrid, Valencia, Castellón,

Ávila, Segovia, La Rioja, Ciudad Real and Granada, except in care homes on the express recommendation of the health authorities. In order to comply with the recommendations of the healthcare authorities, from the outset all of Bankia's ofibuses and managers have been equipped with the necessary protective material: screens, face masks and hydrogels.

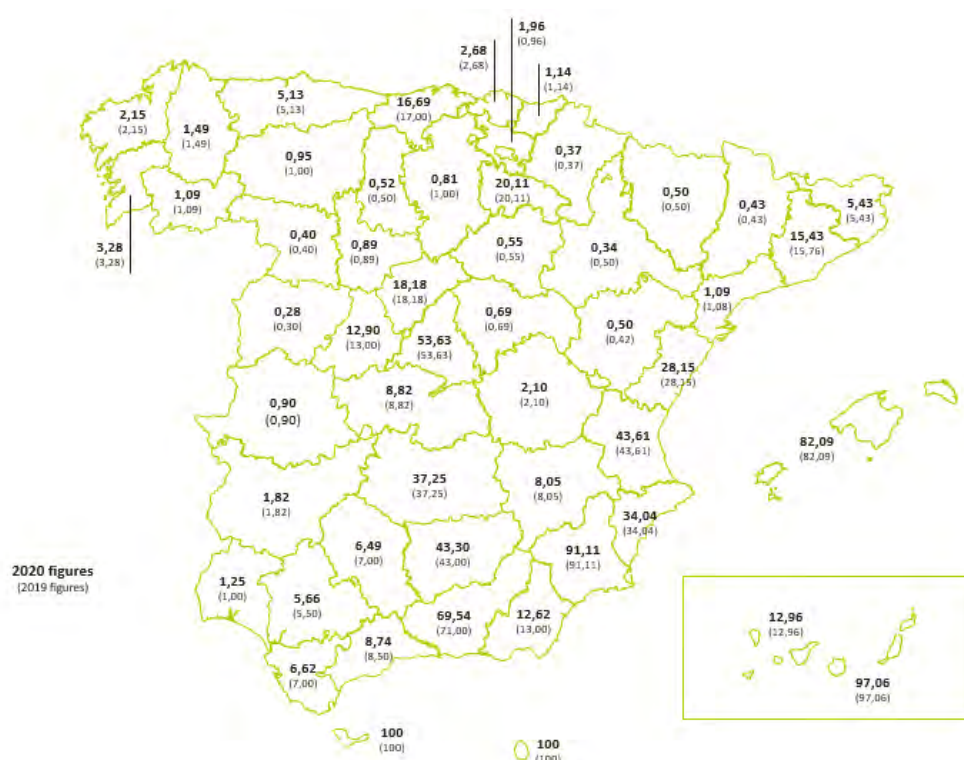
During the state of emergency, the ofibuses have rendered services at a much higher rate than the average of the rest of branches, hitting levels of around 70% of the users who would come under normal conditions.

The Bankia ofibus service makes it possible for a quarter of a million people living in these areas (according to the National Statistics Office (INE)) and at risk of financial exclusion to withdraw cash, make deposits or pay bills and taxes. These mobile Bankia branches are open from 8 a.m. to 6 p.m. Monday to Thursday, and from 8 a.m. to 3 p.m. on Fridays.

Bankia has five ofibuses in Castilla y León, two in the Valencia Autonomous Region and La Rioja, and one in the Madrid Autonomous Region, Castilla-La Mancha and Andalusia. It also has two further ofibuses in reserve.

	2020	2019
No. of ofibuses operating in the territory	14	14
No. of municipalities where the ofibus service is provided	374	373
No. of kilometres covered (monthly estimate)	43,000	43,000

Percentage of municipalities with a Bankia branch



Distribution of the branch network by population centres

	2020	2019
No. of branches in sparsely populated areas	115	115

	2020	2019
< 2,000 inhabitants	5.70%	5.34%
<= 5,000 inhabitants	7.29%	6.64%
<= 10,000 inhabitants	8.59%	8.03%
<= 20,000 inhabitants	8.09%	7.70%
<= 50,000 inhabitants	12.63%	12.48%
<= 100,000 inhabitants	10.90%	11.04%
<= 500,000 inhabitants	24.30%	25.01%
> 500,000 inhabitants	22.50%	23.76%

FINANCIAL LITERACY: BANKADEMIA

Financial literacy is key to facilitating appropriate, secure access to financial products and services. The overriding objective of all financial literacy projects is to mitigate the risk of exclusion. Bankia is a pioneer and innovator thanks to initiatives such as Bankademia, which provides people with understandable, simple, thorough and reliable information on banking products and services and how to carry out banking operations.

Bankademia is an online multiplatform for financial literacy where educational content is presented in multiple formats that each user can view and use according to his or her own preferences. Infographics, videos and podcasts address day-to-day situations and real-life scenarios so as to make knowledge transferable to people's real-life needs. The initiative is part of the Funcas Financial Literacy Stimulus Programme, launched in 2018 by Funcas and CECA.

In 2020 Bankademia offered 10 courses on subjects such as basic finance, housing, savings and investment, taxes, the agricultural sector, SMEs and self-employed workers, aid and grants, and employment. Since its launch, Bankademia has posted 160 articles, 68 videos, 25 podcasts and 45 infographics, involving economic experts and influencers related to the different subjects covered in the courses.

In 2020 Bankademia received 470,000 visits, of which 400,000 were unique users. The average time spent on the site was four and a half minutes, with almost 70% of all visits coming from mobile devices.

e) Effective management of non-performing loans

Bankia has a Recoveries Policy, approved by the Board of Directors and regulation within the Credit Risk Policies Framework, which aims to define the criteria and rules for the Bankia Group's recovery process.

Recovery is a key phase in credit risk and it is essential to have a framework governing matters such as:

- Definition of general recovery criteria.
- Description of specific criteria applicable to the main recovery solutions.
- Definition of monitoring system.
- Description of the governance and reporting framework.
- Definition of the activity control mechanisms.

In Bankia, recovery beings when an impairment event is identified or the first default occurs, and it ends with the recovery or the time-barring of the obligation.

Some of the general criteria for defining the principles of Bankia's recovery activity are:

- When a payment is defaulted, and before the application of recovery solutions, Bankia informs the borrower of the possible consequences of continuing to default.

- The entity ensures that recovery solutions are applied promptly in order to optimise the chances of recovery.
- Bankia adequately segments its loan portfolio so as to implement efficient and effective recovery management.
- The recovery management model is classified as specialist because it applies differential treatment to customers based on the risk segment of the transaction in question.
- Bankia has teams specialised in carrying out recovery strategies by segment, portfolio and risk sub-segment.
- Distinction is made between two types of transaction classification to determine whether an exposure is impaired or not.
 - Transactions with indications of possible impairment: these show some sign of possible impairment and recovery is geared towards preventing the impairment from arising and reducing the risk of default on the obligation.
 - Impaired and/or defaulted transactions: impairment exists due to arrears or other reasons. In this case, recovery is geared towards preventing further impairment and maximising the economic value of the recovered amount.
- The process of evaluating the most appropriate recovery option includes analysis of the borrower's situation to identify the solution or combination of solutions to apply in order to maximise the amount recovered from the impaired or defaulted exposure.
- Collaboration or willingness to pay on the part of the customer is a prerequisite for the application of amicable solutions. In this regard, depending on whether or not the borrower is willing to pay, two different recovery management paths are available:
 - Amicable recovery: steps taken by Bankia from when the impairment or default is detected, involving the application of solutions that require willingness to pay on the part of the customer. Bankia reaches an amicable agreement with the customer, who undertakes to satisfy the past-due payments or avoid future defaults.
 - Recovery in litigation: this will commence once all possibilities of an amicable recovery have been exhausted due to an unwillingness and/or inability to pay.

Bankia is a signatory of the Code of Good Practice (CBP) created by Royal Decree-Law 6/2012 of 9 March on urgent measures to protect mortgagors undergoing hardship, amended by Law 1/2013 of 14 May on measures to further protect mortgagors, debt restructuring and social leases, by Royal Decree-Law 1/2015 of 27 February, and by Royal Decree-Law 5/2017 of 17 May, without prejudice to the applicable regulation at a given time.

In compliance with such legislation, Bankia informs customers showing signs of difficulties to pay debt secured by a mortgage over their primary residence of the options to avail of the measures established by the Code of Good Practice.

In addition, Bankia voluntarily makes efforts to resolve situations that might otherwise involve home repossession and to prevent vulnerable families from being left without any housing options.

In 2020 Bankia accepted 1,104 recovery agreements to discharge the mortgage in exchange for surrender of the property, with a combined value of EUR 165 million. In 2019, we signed 1,787 agreements of this kind. In all cases, we negotiated solutions to avoid evictions and repossessions affecting vulnerable groups, while preserving the bank's interests as far as possible. In this way, the bank has helped mitigate the loss of primary residences for many families and vulnerable groups.

6. COMMITMENT TO THE ENVIRONMENT

a) Social contribution

Bankia made a considerable effort in 2020 to adapt to the exceptional circumstances that arose last year and forged ahead with its social investments, allocating them to society's most pressing needs. The priorities when it came to managing this investment revolved around the speed, responsiveness and flexibility required to launch effective initiatives and projects.

Bankia continued to prioritise the areas set forth in the 2019-2020 Responsible Management Plan, with a special emphasis on job creation, housing, education and local development. However, in 2020 there was a considerable increase in new poverty programmes aimed at emergencies stemming from the COVID-19 crisis.

In the face of this adverse climate, the amount earmarked for social investment by the entity remained stable at almost EUR 23 million.

The bank made a firm commitment to pressing ahead with all its financing calls, as well as to helping businesses with management difficulties, to adapting the timescales to present projects, to bringing forward payment periods and to creating innovative ideas to join forces with its stakeholders: customers, employees, society at large, public administrations, etc. Last year was a paradigm of teamwork and solidarity.

Priority areas	2020		2019	
	Investment (EUR)	%	Investment (EUR)	%
Employment	817,010	3.6%	981,825	4.4%
Education	3,047,340	13.3%	3,102,681	13.8%
Local development	5,823,525	25.3%	6,387,327	28.3%
Disabilities	2,340,536	10.2%	2,481,368	11.0%
Employee projects	1,547,873	6.7%	2,109,435	9.4%
Housing	5,075,287	22.1%	3,387,362	15.0%
Working poor	359,000	1.6%	73,794	0.3%
Environment	630,693	2.7%	619,331	2.7%
Corporate sponsorship	1,240,006	5.4%	1,148,846	5.1%
Business sponsorship	2,093,563	9.1%	2,243,839	10.0%
Total	22,974,833¹	100.0%	22,535,808	100.0%

1. Of the total amount for 2020, EUR 9,451,266 went directly to foundations and non-profit organisations. Includes the contribution to Fundación FP Dual (Dual Vocational Training Foundation). This direct allocation amounted to EUR 9,628,380 in 2019 and EUR 10,013,983 in 2018.

	2020	2019
Number of foundations and associations supported by Social Action programmes	925	846
No. of beneficiaries	647,184	608,499

LOCAL DEVELOPMENT

One of the salient decisions made last year was to press ahead with the calls for applications for social aid that Bankia launches every March, alongside its 11 original foundations, even though the lockdown in Spain hindered the processing of the applications and the aid itself. Thanks to a fully digital platform, the bank was able to put all the calls in motion, as well as to uphold the agreements with its original foundations, to which it allocated a total amount of EUR 4.4 million.

Calls for applications for social aid were launched in March, attracting bids from 1,043 local entities, of which the entity ultimately supported 506 projects in total. Ongoing support was also provided to the original foundations, allowing them to maintain activity at their centres, which adopted the required safety measures and limited their physical capacity. Aid was also provided for local assistance programmes and social and cultural initiatives, as well as those aimed at combatting rural depopulation and poverty.

Besides investing directly in social intervention, Bankia continued to support the Lo Que De Verdad Importa foundation's conferences on values, which were held online this year, except in Madrid and A Coruña.

Table of projects and beneficiaries

Foundation	2020		2019	
	Projects	Beneficiaries	Projects	Beneficiaries
Montemadrid Foundation	79	103,401	79	90,090
Bancaja Foundation	60	329,480	56	20,791
Caja Rioja Foundation	23	2,964	26	4,093
La Caja de Canarias Foundation	42	9,947	35	12,114
Ávila Foundation	26	1,444	26	2,788
Caja Segovia Foundation	29	3,196	22	2,474
Iluro Foundation	12	806	11	1,442
Caja Castellón Foundation	40	22,828	41	17,339
Caja Granada Foundation	86	77,716	81	11,380
CajaMurcia Foundation	67	34,868	63	18,359
Sa Nostra Foundation	42	18,319	33	48,142
Total	506	604,969	473	229,012

EMPLOYMENT

The Red Cross and Cáritas Employment programmes supported by Bankia were also adapted to the exceptional circumstances in 2020. Although focused on employment, some programmes were repurposed for urgent and priority assistance. The Red Cross and Cáritas Employment programmes exceeded a total of 4,600 beneficiaries across all Spanish provinces.

The entity continued to provide aid to help its unemployed customers find work, in the conviction that genuine social responsibility starts at home, i.e. by helping stakeholders which are currently experiencing hardship. The programme, named Empleo en Red and run jointly with Randstad Foundation, helps the bank's unemployed customers find work, providing jobseeker guidance and honing their employment aptitudes. Last year, 133 people signed up to the programme, joining the 1,625 participants enrolled since its creation in 2013, of which 46% have gone on to find work.

One of the good practices detected was the implementation of Empleo en Red within the bank's Recoveries Department as a supplementary aid channel for customers experiencing economic difficulties and faced with loan repayments.

A new entirely digital employment programme was introduced in 2020 in conjunction with Universidad Internacional de La Rioja (UNIR). Aimed at 300 people, the programme creates employment incubators aimed at driving the job-seeking process, while also studying sectors, strategies and trends that are generating labour opportunities.

	2020	2019
Number of employment and labour integration projects	210	151
Number of direct beneficiaries of employment and labour integration projects ¹	55,739	43,363
Number of customers joining Empleo en Red	133	86
Percentage of customers in Empleo en Red successfully finding work since its creation	46%	46%

1. Since 2019 the calculation has been made by an independent expert. Whereas formerly the figure would reflect the number of beneficiaries by budget line, the new method itemises the type of project and its beneficiaries.

EDUCATION: DUAL VOCATIONAL TRAINING

Since the creation of the Fundación Bankia por la Formación Dual (Dual Vocational Training Foundation) in 2016, activity has gradually intensified with 2020 proving to be a year of clear consolidation.

Over the course of 2020, the Foundation has positioned itself as a landmark body operating in the vocational training field, as reflected by the fact that its Chairman, José Antonio Goirigolzarri, was invited to speak at the presentation of the new Vocational Training Modernisation Plan in July, alongside Spanish Prime Minister Pedro Sánchez and Deputy PM and Minister for Economic Affairs and the Digital Transformation, Nadia Calviño, among others. He also attended a working breakfast event in December organised by the Minister for Education and Vocational Training, Isabel Celaá, alongside ten or so business organisations and companies, to analyse what is required and needed to drive Dual Vocational Training forward.

Nevertheless, due to the COVID-19 pandemic, many of the activities planned have had to be adapted (in most cases moving to an online format) or even postponed or suspended.

The foundation undertakes four specific lines of action.

Support for and improvement of Dual Vocational Training.

This line of action seeks to support dual vocational training and enhances training quality, increases students' employability and helps businesses become more competitive.

Our efforts take the form of public-private initiatives. Programmes and activities involve a range of players, including government bodies, schools, businesses, Chambers of Commerce and other agents involved in vocational training.

Highlights include:

- A call for applications for Dualiza grants, in partnership with the Asociación de Centros FPempresa. The programme supports vocational training projects involving schools and businesses. Grant awards are made on the basis of innovativeness, local impact, sustainability and knowledge transfer.

More than 200 candidacies were received in 2020. Thanks to this initiative, many students had a first experience of the working environment and even a first job offer from their host business.

- Further training actions to improve the job qualifications of teachers and employability of young people in high-demand industries. Highlighted activities include:
 - COMEX programmes on the economic and financial management of international trade.
 - DITEC programme to improve digital competence.
 - Programmes related to the agricultural field: Agrifood Co-operative Technician; Olive Press Specialist; Extra Virgen Olive Oil Specialist.
- Launch of the www.recursofpp.com website, which groups together the leading digital education resources on the Internet, thereby facilitating the work of vocational training professionals as regards remote teaching against the backdrop of the pandemic. Furthermore, 11 training webinars on this website have been held, aimed at management teams and vocational training professionals on aspects

of interest to them (how to assess students remotely, how to apply new methodologies to the vocational training classroom, etc.). Over 5,000 people took part in these webinars led by experts.

- Initiatives aimed at fostering innovation in the vocational training field, in particular:
 - The first edition of National Hackathon for vocational training professionals, organised in conjunction with FP Innovación. This saw over 200 participants searching for innovative and practical solutions to the challenges around notions of education, social welfare/remote assistance, health, rural depopulation, the environment, sustainability, the sharing economy, tourism and culture/leisure.
 - 3rd edition of the Dualiza Challenge in the Madrid Autonomous Region, aimed at schools, companies and dual vocational training students, to encourage innovation and an entrepreneurial culture among students, lending higher visibility to the impact of their work on the processes of innovation and continuous improvement at the companies where they train.
 - First edition of Mostra d'ImpulsFP, an online initiative carried out in conjunction with the Department of Education of the Catalan regional government. The initiative saw over 1,500 people take part, including vocational training students and professionals.
- Call for SANEC grants to help vocational training students join top-level biomedical research teams. This year over 40 grants were awarded to students in Catalonia and the Valencia Autonomous Region.
- Pilot projects in strategic sectors: e.g. the first intermediate level training cycle in agricultural production in dual mode, with a focus on pig farming in Castilla y Leon and in Aragon; a special skills course on cyber security for higher level vocational training students in Madrid.
- Support for associations, business organisations and Chambers of Commerce that promote vocational and on-the-job training as a way of improving the employability of young people and business competitiveness, especially SMEs and micro-SMEs.

Support, promotion and awareness

The aim of this line of action is to improve the public perception of vocational training in general and dual training in particular, and to help dispel the prejudice that vocational training is 'second best'.

Key actions included:

- Vocational training conferences: support given to the 3rd National Meeting on FP SUMA and the EUROPEAN SPAIN 2020 Association Meeting under the banner "Vocational training as an engine for development".
- Dual Vocational Training Fairs: events -adapted to be either entirely or partially online- hosted in partnership with the Spanish Chamber of Commerce. Spaces were available for advice to companies, meeting points between students and businesses ("marketplace"), demonstrating good practices, orientation workshops for students, etc. In 2020, six fairs were held in Almería, Campo de Gibraltar, Linares, Ceuta, Ciudad Real and Murcia.
- Organisation and/or attendance at conferences, seminars and events, either online or in situ, related to vocational training, such as the 6th Forum of the Alianza para la FP Dual; the 16th CIPFP AUSIÀS MARCH 2020 Seminars; Foro-Profes, organised by trade journal Cuadernos de Pedagogía; and the 5th Talento Logístico Forum.

Research and innovation

Within the Foundation, research and innovation work takes place at our Knowledge and Innovation Centre. The aim is to gain a better understanding of vocational training and encourage debate based on scientific data, in aid of useful and effective decision-making.

Highlights of the activities carried out during the year include: the presentation, in conjunction with the Orkestra-Basque Institute of Competitiveness, of the Vocational Training Observatory. This is a free platform that brings together all the data on initial vocational training, dual vocational training and vocational training for employment in Spain.

Various research projects have also been carried out. Specifically: “Challenges and action strategies around research into vocational training in Spain”; “Guidance in Vocational Training in Andalusia: Diagnostic assessment, challenges and proposals”; “The Vocational Training System in Castilla-La Mancha”; and the “1st Report on Vocational Training in Spain 2020”.

Vocational, academic and personal guidance

We seek to enhance the quality of guidance from a broad-ranging standpoint that embraces academic, occupational and personal perspectives and helps young people choose a career path that makes a good fit with their personal preferences, in the light of recent labour market trends.

Highlights of the activities performed are as follows:

- Call for Active Guidance Projects, a pilot project that seeks to transform schools into active agents in career guidance and to secure greater resources by bringing on board the business community and public authorities. As a result of the COVID-19 pandemic, a sizeable part of the 31 projects launched have been modified to adapt them to the current circumstances.
- Holding seminars on vocational training/dual vocational training with business leaders in order to attract young talent to training programmes in industries that offer solid job prospects and that require skilled professionals.
- Supporting the development and dissemination of the “1st study on the role of parents in the career guidance of their children”, alongside the platform Gestionando Hijos.

NEW POVERTY

Bankia launched a comprehensive aid programme this year to combat the effects of the COVID-19 crisis. With an allocation in excess of EUR 300,000, of particular note is the activity to support 10 food banks in Spain in particular need: Granada, Murcia, Valencia, Alicante, Castellón, Mallorca, Barcelona, Madrid, Las Palmas de Gran Canaria and Ávila. In addition to the monetary support, the entity also kicked off a campaign to donate books to these same food banks to help families with children of school age.

Bankia kept open a system of direct COVID-19 aid throughout 2020 for associations, retirement homes and other facilities in urgent need of protective equipment or food for vulnerable families. For this challenge, the entity also involved its retail and business customers, some of whom made urgent donations through various microdonation campaigns.

Among the contribution made by customers, of particular note is the microdonation campaign for Fesbal, the Spanish Federation of Food Banks.

ENVIRONMENT

The entity has upheld its support for environmental projects related to biodiversity, sustainable development, the circular economy and technological innovation. In Autumn 2020 and for the first time, the entity launched a call for applications jointly with nine of its original foundations, while the two calls initiated in 2019 with Montemadrid Foundation and Bancaja Foundation were continued. In total, 49 projects in 18 Spanish provinces were supported.

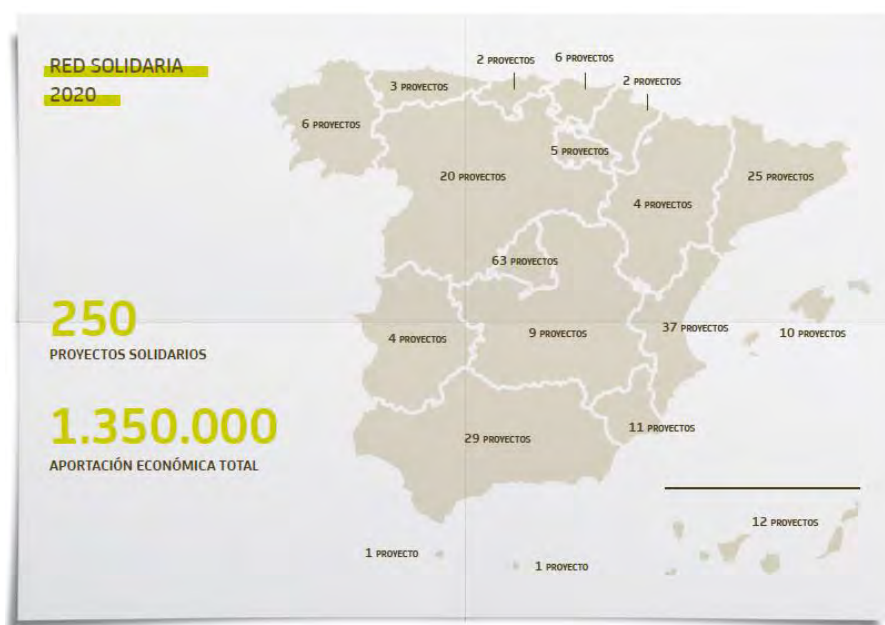
Also, for the third year running, Bankia has cooperated with WWF Adena to restore 60 hectares of Mediterranean forests at Las Tablas de Daimiel National Park (Ciudad Real), which will enable their natural regeneration and make them more resilient to climate change.

PROJECTS WITH EMPLOYEES

Red Solidaria remains the entity's iconic, star programme.

Now in its eighth edition, the programme selects 250 projects from around Spain, in which the bank's main departments are represented. Retail Banking (167 projects), Business Banking (73 projects) and Central Services (10 projects), to which EUR 1,300,000 were allocated through three extraordinary aid packages in June, September and February 2021 as a way to ramp up the help against the backdrop of the COVID-19 crisis.

A total of EUR 1,350,000 was allocated to the programme at year end, including management costs.



The programme's strategy in 2020 was adapted to an Emergency Plan given the situation of the NGOs following the outbreak of the pandemic. This saw all projects receive an extra line of EUR 5,000 and a maximum of EUR 7,000 based on their results. This extraordinary approach was adopted in 2020 to address the major existing needs.

Planta tu Proyecto.

The seventh edition of the "Planta tu Proyecto" selected five finalists (Murcia, Madrid, Alicante and Pontevedra) to which a total of EUR 35,000 in donations was distributed for projects at entities of the likes of Astrapace, Actays, Acción y cura para Tay Sachs, Ayudemos a un niño, Asociación Emilia Gómez ADAFAD and Ar4terapia.

As part of this internal process, bank employees present charity projects in which they participate as volunteers. Since its launch in 2013, over 57,662 people have directly benefited from the aid for this programme. In total, 71 projects have been supported with around EUR 500,000.

Contigo dos pueden ser cuatro

In addition to the direct aid campaigns to address emergencies, Bankia launched its seventh campaign to support food banks the Spanish Federation of Food Banks (FESBAL) during the Christmas period. Through the "Contigo 2 pueden ser 4" micro-donations campaign, Bankia commits to doubling the amount of each donation up to a maximum of EUR 20,000. This initiative raised EUR 21,568, leading to a total donation of EUR 41,568 to FESBAL.

Volunteering

Last year marked a turning point in terms of volunteering, as the COVID-19 pandemic caused most of the volunteering activities to be conducted online from March 2020 onwards.

Of the 94 volunteering sessions carried out last year, 70% were online.

This set of circumstances also led to a sharp rise in online training in various areas. In 2020, a total of 87 workshops were delivered, equivalent to 1,860 hours of training.

	2020
Number of training sessions delivered on financial education and management	87
Number of training hours delivered on financial education and management ¹	1,860
Number of volunteers participating in the training sessions on financial education and management	93
Number of beneficiaries of the training sessions on financial education and management	674

1. Includes time preparing the training sessions and follow-up activities.

Specifically, the financial education and training workshops are reinforced through programmes / collaboration agreements with various entities, namely:

- Randstad Foundation. The volunteer training programme known as “Enseña lo que sabes” allows Bankia professionals to deliver in-person or online workshops to users of the Foundation who are out of work or who belong to vulnerable groups.
- Secot, the association of Spanish senior citizens for technical cooperation, which fosters a programme aimed at bridging the digital divide for senior citizens.
- Integra Foundation. Workshops that deliver training to various groups, such as victims of gender violence, inmates or former inmates and other people at risk of exclusion.
- Acción contra el Hambre: As part of its programme geared towards entrepreneurs, Bankia volunteers deliver mentoring workshops for small businesses on trading or investment, and even support.
- Spanish Red Cross: As part of its “Women’s empowerment itineraries”, the entity offers workshops on financial education delivered by Bankia volunteers.

The boom in the use and implementation of new technologies across economic sectors and the population more broadly, coupled with the development of a new internal IT app to manage volunteering within Bankia, were partly behind the positive reception of these training sessions by both users and volunteers.

In this respect, during the last quarter of the year, a further solidarity initiative was launched, the **Solidarity Breakfasts**, which have now moved online after traditionally being staged at a physical venue. This initiative brings together Bankia professionals and the social entities with which they are involved or those that have been invited to explain the charitable cause they represent. The breakfasts also act as a fundraising event for the NGO featured at each meeting; attendees can make a donation via a Bizum mobile payment channel.

DISABILITIES

Bankia upheld its strategic commitment to the normalisation of people with disabilities within the organisation through involvement in workplace integration projects for differently abled people, as well as fostering the procurement of goods and services through Special Employment Centres.

A highlight was the Capaces call for proposals, in partnership with the Bancaja Foundation. In its seventh edition, it awarded EUR 150,000 to 15 non-profit organisations in the Valencia Autonomous Region. All the beneficiary non-profit organisations run labour integration and social inclusion projects for differently abled people.

The bank took part in the Randstad Foundation's Integrados programme: 227 users (unemployed people who have been certified as having a disability of 33% or above) took personalised labour integration courses to help them find work in the general labour market.

	2020	2019
Number of supported NGOs that run programmes for labour integration of people with disabilities	341	408
Investment in NGOs to conduct disability programmes (EUR million)	2.34	2.49
Number of people with disabilities benefiting from labour integration programmes	65,229	172,021

HOUSING

In 2020, Bankia kept housing stock available for vulnerable people who were provided with means-tested social rent on terms adapted to their ability to pay. During the past year the bank signed 305 means-tested social rent contracts (122 of which were protected homes rented under Catalonia Regional Law 4/2016). Total means-tested protected housing rental contracts came to 4,071. Thanks to these figures, Bankia has fully met its commitment in this field through the Social Housing Fund.

The bank earmarks a significant budget for repair and maintenance of protected housing so that the homes remain in good condition, thereby lowering the cost for tenants. The bank allocated EUR 5 million to maintain the protected housing programme, covering the cost of housing maintenance and repairs.

Bankia has agreements in place to speed up protected housing award processes in Madrid, Castilla-La Mancha, the Canary Islands, Catalonia, the Valencia Autonomous Region and La Rioja. Agreements with local authorities help improve the process of awarding housing to households through municipal social services.

SPONSORSHIPS

Bankia remains committed to its sponsorships agreement, aimed at improving the communities where it operates in the fields of culture, sport and business. Following this atypical year, the entity is as dedicated as ever to supporting these events, despite the COVID-19 pandemic leading to reduced activity. Nevertheless, work has continued with the sponsored parties to maintain activity going forward and its commitment to society.

The following projects are noteworthy as regards cultural sponsorships:

•Bankia Symphony Orchestra

The Bankia Symphony Orchestra cultivates musical talent and works towards the labour integration of young musicians. Now in its eighth year, the Orchestra is mainly focused on its new role as the resident orchestra of the Gran Teatro Bankia Príncipe Pío.

Moreover, the Bankia Symphony Orchestra's string quarter participated last year in the "Los Paseos Musicales del Botánico" programme, a series of classical and contemporary music concerts held from June to October as part of the contemporary culture programme at Madrid's Botanic Garden.

•Bankia Escolta a Valencia

2020 saw the seventh edition of the Bankia grants for students of music schools in the Valencia region, a programme that has benefitted over 700 students.

Another major initiative within the Bankia Escolta a Valencia programme is the Bankia Orchestra Festival. Now in its third year, it aims to promote and support string instrument music, as well as the over 170 orchestras in the Valencia Autonomous Region.

Following an extensive refurbishment, the L'Alquería Julià country house was handed over to the Valencian Federation of Musical Societies, which will make it its new home and HQ. The Federation will be able to conduct the rest of its cultural activity at the venue, such as its Study Centre and music groups, as well as training and research activities, and the installation of the Federation's archive.

•Gran Teatro Bankia Príncipe Pío

The Gran Teatro Príncipe Pío opened its doors in 2020 with a varied programme of events. When lockdown was lifted, the theatre resumed activity in compliance with all the safety measures recommended by the health authorities, both for the artists and employees and for the audience. The facility has since become a cultural beacon.

•Madrid Book Fair

Once again, Bankia sponsored the Madrid Book Fair, which had to be held online for the first time last year.

In terms of sporting sponsorships, the entity continues to fuse its corporate values with those associated with sport. It is involved in:

•Youth development system

Support for sports schools, youth teams and the training schools of various sports clubs:

Bankia is the official sponsor of the following youth and training teams:

- Club de Baloncesto Gran Canaria (Las Palmas de Gran Canaria).
- Valencia Basket (Valencia).
- Club de baloncesto Óbila (Ávila).
- CB Estudiantes (Madrid).
- Joventut de Badalona (Badalona).
- TAU Castellón (Castellón).
- UCAM Murcia (Murcia).
- CB B The Travel Brand Mallorca (Palma de Mallorca).
- Menorca Basquet (Menorca).

It also sponsors the Club El Pozo five-a-side youth team in Murcia and the rugby youth teams of Bathco-Fusodeba in Santander and Rugby Pozuelo in Madrid.

Thanks to these sponsorships, over 5,000 boys and girls have benefited from these activities.

The charity “triples” contest involving the A teams of Valencia Basket, CB Gran Canaria and CB Estudiantes were held once again in 2020. In this regard, for each three-point field goal scored during the season, Bankia donates a sum of money to the training teams of the above-mentioned clubs.

The basketball teams and their players have also played eight charity games online to generate money for local food banks, raising EUR 80,000 for families most in need.

Bankia is the official sponsor of the ski school adapted for the differently abled at the Sierra Nevada Ski and Mountain Resort (Granada), which welcomes 2,500 people every season to enjoy this winter sport.

The entity continues to support female sport, backing the Women in Black, the Estudiantes Basketball Club's female team, as well as the women's versions of all the youth teams that the entity sponsors.

•Valencian *Pilota*.

The entity's commitment to Valencian pilota, a sport native to the Valencia Autonomous Region, is now in its sixth year, supporting both the women's and men's leagues.

Business-wise, the entity remains committed to companies and continues to enter into agreements to carry out specific actions with various business bodies, associations and chambers of commerce. Due to the

pandemic, activities that were initially going to be in-person or in situ have been moved to a hybrid format or are 100% online.

Various fora and meetings were held to discuss the impact of COVID-19 on the different economic sectors, the digital transformation and that of SMEs, tax reform and business financing.

The bank has also sponsored various business awards, some in conjunction with media outlets, such as Premios In4Bankia in conjunction with newspaper Información de Alicante; the Premios a la Competitividad Digital with magazine Castilla y León Económica; the Innobankia awards with five titles belonging to the Editorial Prensa Ibérica publishing group; the Premios Tu Economía with national daily La Razón; the Premios Comprendedor alongside Empresa y Sociedad Foundation; the Premios Andaluces del Futuro' with the Joly publishing group; and Premios Talento Joven with regional daily Levante, among others.

b) Direct environmental impact

Bankia demonstrates its commitment to sustainability in its business model and works to achieve growth with full respect for the environment. To do so, it mainstreams environmental management in the organisation's decision-making, aligning it with its business strategy and including environmental governance in its overall management. Our environmental policy involves:

- Commitment in the fight against climate change
- Professionalism in employee training and awareness-raising
- Achievement orientation, seeking continuous improvement of environmental management and establishing specific targets and systems of indicators
- Integrity based on transparent action
- Closeness to suppliers, so as to involve them in joint management of environmental challenges and opportunities.
- In line with this commitment to the environment, in 2017, Bankia's Responsible Management Committee approved the Eco-efficiency and Climate Change Plan. This Plan, which was completed on 31 December 2020, has positioned Bankia as a carbon-neutral player (scopes 1 and 2) and a leader in the fight against climate change.

The plan was structured into six lines of strategic action, each of which, in turn, was designed to achieve specific quantitative and qualitative objectives¹:

- Increase to seven the number of Bankia's emblematic buildings with an environmental management system certified to the ISO 14001:2015 standard.
- Reduce greenhouse gas emissions by 20%, through policies and investments that foster direct reduction, as well as offsetting unavoidable emissions.
- Achieve a 19% decrease in energy consumption and a 5% reduction in the consumption of water, paper and toner.
- Reduce waste generation by 5% and search for new alternatives to the main types of waste generated by the bank within the context of the circular economy.
- Promote environmental protection and the transition towards a low-carbon economy via the sustainable procurement of goods and services.

¹In 2018 Bankia absorbed Banco Mare Nostrum, which led to a 30% increase in operational sites under management. As a result of this organisational restructuring, Bankia changed the baseline year used to set the objectives of the Eco-efficiency and Climate Change Plan from 2016 to 2018. Despite the change made to the baseline year, the scope of the objectives remained the same so as to continue stepping up climate action and the efficient use of natural resources.

- Spread a culture of environmental commitment across the organisation through environmental training and awareness-raising.

In 2018 Bankia absorbed Banco Mare Nostrum, which led to a 30% increase in operational sites under management. As a result of this organisational restructuring, Bankia changed the baseline year used to set the objectives of the Eco-efficiency and Climate Change Plan from 2016 to 2018. However, the scope of the objectives remained the same so as to continue stepping up climate action and the efficient use of natural resources.

	2020	2019	2018	2017
Environmental expenditure for implementation of the Eco-efficiency and Climate Change Plan 2017 - 2020 (EUR million)	1.8	7.6	6.3	8.9

Details of the efforts to achieve, and in many cases, exceed, the above-mentioned targets are set out below:

Objective: Increase to seven the number of Bankia's emblematic buildings with an environmental management system certified to the ISO 14001:2015 standard.

Bankia has an ISO 14001 certified Environmental Management System in place. The five buildings already holding this certification -Pintor Sorolla 8 in Valencia; Paseo de la Castellana, 189 and Las Rozas in Madrid; Triana 20 in Las Palmas; and Miguel Villanueva 9 in Logroño- have been joined by the Plaza 53 branch on calle Serrano and the Fintech centre on calle Fuencarral, both in Madrid. These last two centres have also been accredited with environmental certification following an exhaustive audit carried out by AENOR, in which "no failures to comply" were detected.

The addition of these new centres to Bankia's Environmental Management System signals compliance with the objective set in 2017 and underscores the entity's environmental commitment, which goes above and beyond basic environmental legislation. This commitment is based on ongoing improvement and the action plans already underway to make Bankia a more sustainable bank.

Objective: Reduce greenhouse gas emissions by 20%, through policies and investments that foster direct reduction, as well as offsetting unavoidable emissions.

The fight against climate change and the declaration of the national climate emergency lie at the heart of all the bank's operational activities and decisions. A raft of measures have been introduced since 2017 which have actually reduced CO₂e by 59.8% in 2020, comfortably ahead of the target of a 20% reduction.

The primary steps taken to achieve this historic reduction in emissions, despite growing the business and increasing the number of work centres under management in recent years, include the following:

- The use of electricity from 100% renewable sources at all buildings and throughout the branch network during the lifecycle of the Plan, which has avoided emissions of 141,533 tCO₂e. Bankia's commitment to the use of renewable electricity is enshrined in its environmental policy, which guarantees that Bankia work centres will never use polluting electrical energy sources in the future.
- New technologies at all workstations so that employees can work from home, communicate by videocall and give presentations online, without having to travel.
- Renegotiation of the terms and conditions of executives' leased vehicle contracts. Since 2017 all new vehicles added to the fleet have been hybrid cars with low CO₂e emissions, posting a reduction of 97.1% in that regard.
- Dissemination via the Intranet of specific sustainable mobility campaigns to promote the use of alternatives to the private car as a mode of transport. Bicycle racks have been installed at the three buildings with the highest staff occupancy (P. Castellana, 189, Las Rozas and Pintor Sorolla).

Bankia has recorded its carbon footprint in the official Footprint Register established by the Ministry for the Ecological Transition and Demographic Challenge since 2014 and, since 2016, has obtained the

Calculate/Offset seal (2016-2019). Efforts by the entity to cut CO₂e emissions in 2019 earned it the triple Calculate/Reduce/Offset seal.

To supplement its commitment to reduce CO₂e emissions, Bankia undertook to be carbon neutral by offsetting its unavoidable emissions through the use of current technological developments. Bankia offsets these unavoidable emissions by buying carbon credits that are produced by projects that contribute to the UN's Sustainable Development Goal (SDG) 13 Climate action, as well as other related SDGs considered a priority for Bankia, such as No. 11 Sustainable cities and communities, No. 7 Affordable and clean energy and No. 4 Quality education.

Bankia has also developed and implemented an internal strategy in 2020 for setting an internal carbon price (ICP). Setting this internal price has become an essential tool for further reducing our carbon footprint, mitigating risks and identifying climate-related opportunities to prepare the bank for a low-carbon economy.

Bankia's efforts have positioned it as a green company and a world leader in this domain, as acknowledged by the analysts of CDP Climate Change, who awarded it a rating of A-.

Objective: Achieve a 19% decrease in energy consumption and a 5% reduction in the consumption of water, paper and toner.

Over the course of the Plan, Bankia has made considerable investments to be increasingly efficient in the use of resources, leading to a reduction in its direct and indirect environmental impact. The investment of over EUR 24.6 million went to the following measures:

- Renewal of climate control systems at branches and offices, substituting 430 pieces of equipment with more energy efficient replacements that have a low climate change impact.
- Implementation of new measures, some of which are innovative, such as co-generation systems attached to climate control equipment; and more commonly known measures, such as the installation of LED lighting and motion sensors in work centres.
- Replacement of traditional mixer taps for ones operated with a pushbutton in major buildings and the installation of dual-flush toilet cisterns in lavatories.

To reduce paper and toner consumption, paper correspondence with digital customers was eliminated, with efforts ongoing to boost the use of digital signatures with customers and suppliers alike. A project was also undertaken to monitor the bank's printers, which has enabled real-time control of paper and toner consumption and has contributed to major cost savings in terms of office supplies

The above-mentioned measures, together with the commitment of all bank employees to efficiency and respect for the environment, have brought about a reduction in energy consumption of 27.7% ², in water of 16.3%, in paper of 44.3% and in toner of 51%.

Objective: Reduce waste generation by 5% and search for new alternatives to the main types of waste generated by the bank within the context of the circular economy.

Within the timescales of the Plan, Bankia has reduced the generation of waste by 43.8%. With efforts under way in Europe to promote the circular economy and to focus on the recovery and the reuse of waste, Bankia has furthered its furniture, electrical and electronic equipment, and office material donation campaigns, supporting social non-profit organisations and schools. These donations are an important contribution to the charity work of non-profit organisations and prevent the generation of waste.

Other Bankia projects aimed at reintroducing the waste back into the economic cycle are as follows:

- Recycling of writing materials (pens, pencils and highlighters) for their reintroduction back into the economy as raw materials.

² For this calculation 2013 was taken as the baseline year.

- Selective collection of plastic caps, the aim of which is twofold: environmental, thanks to recycling over 950,000 caps, and social, as proceeds from the recycled materials are donated to the Phelan–McDermid Syndrome Association that supports children suffering from this disease.
- The sorting and composting of plant pruning waste at the Las Rozas site, transforming this waste into fertiliser for the facility's own gardens.

Objective: Promote environmental protection and the transition towards a low-carbon economy via the sustainable procurement of goods and services.

In recent years, Bankia has gained a deeper understanding of the environmental impact associated with its value chain. For example, Bankia has thoroughly analysed its CO₂ emissions linked to its suppliers and the services rendered by them, a factor that was taken into consideration in the new Procurement Policy approved in 2020 by the Board of Directors. This new policy makes a clear commitment to engaging with suppliers that apply the best ESG practices and that work towards implementing these practices across the value chain.

To encourage suppliers with the greatest environmental impacts to collaborate more, Bankia hosts training and awareness-raising workshops. The sessions cover environmental regulations and management information and discuss best practices.

Objective: Spread a culture of environmental commitment across the organisation through environmental training and awareness-raising.

To foster an environmental culture amongst the bank's professionals, an online Environmental Management course has been integrated into each employee's Personal Training Plan. The aim is to remind employees of the major environmental problems, while also informing them of the initiatives and steps taken by Bankia to minimise them. The course makes simple and interesting suggestions about good environmental practices that can be considered in one's professional and personal life.

	2020	2019
No. of professionals that have received environmental awareness training	2,799	336

Bankia also has a specific environmental section on its corporate Intranet and in its digital Somos Bankia magazine. Through these internal communication channels, Bankia disseminates practical environmental information on the efficient use of water, the circular economy, energy savings and climate change.

ALLIANCES AND INITIATIVES

Bankia believes it is vital to become involved in domestic and international initiatives that forge alliances to raise environmental awareness and share experiences, success stories and concerns in the fight against climate change and in biodiversity conservation. Key alliances include:

- **Spain:** The bank is a member of the Climate Change Cluster of Forética, the Spanish Green Growth Group, and the Spanish Platform for Climate Action, and continues to be a strategic ally of the Climate Community promoted by the ECODES foundation. In 2019, at the COP 25 climate summit, the bank signed a collective agreement for Climate Action in the banking sector, sponsored by the Spanish Banking Association (AEB) and CECA, in line with commitments made within the UN.
- **Internationally:** Bankia was one of the 30 financial institutions that signed the Collective Commitment to Climate Action promoted by the UN and embedded in the Principles of Responsible Banking. At the European Union level, Bankia adhered to the European CEOs' undertaking titled A New Deal for Europe, which calls for a global strategy towards a sustainable Europe by 2030 and for rising to the challenge of climate change.

The bank participates in initiatives such as Earth Hour, promoted by the WWF and RE100, created by CDP and The Climate Group to bring together the world's most influential companies that are committed to renewable energy.

Since July 2019, the bank has been a member of the World Bank's Advisory Group for Article 6, created specifically for the 'Climate Markets' project, which aims to implement an international carbon market in

accordance with Article 6 of the Paris Agreement. One of the technologies being considered and developed is blockchain. Progress achieved by Bankia in blockchain technology and our project for tokenisation of carbon emissions aroused the interest of the World Bank, prompting it to invite Bankia to join the Advisory Group and share experience in this field.

ENVIRONMENTAL INDICATORS

Consumption of materials ¹

	2020	2019	2018	2017	2016
Recycled paper (DIN A4) (t) ²	484.61	627.52	869.97	736.92	651.39
White paper made from virgin pulp with a low environmental impact (DIN A4) (t) ³	1.13	1.59	1.83	1.66	1.55
% of consumption of paper produced using ECF-certified virgin pulp (DIN A4)	100%	100%	100%	100%	100%
% of paper used that is recycled (DIN A4)	99.77%	99.75%	99.79%	99.77%	99.76%
Consumption of printer cartridges (units)	9,845	14,417	20,084	13,871	15,057
Percentage of printer cartridges used that are recycled	3.1%	6.98%	12.48%	24.34%	88.38%

1. Data for Bankia, S.A.

2. Recycled paper has the following guarantees: European Ecolabel, Ángel Azul and CradletoCradle (Silver).

3. Paper supplied by manufacturers with FSC and PEFC certifications, which guarantee that materials used come from sustainably-managed forests.

Energy and water consumption ¹

	2020	2019	2018	2017	2016
Total water consumption (cubic metres) ²	388,489.4	317,490.8	464,393.0	240,537.5	244,516.0
% of electricity acquired from renewable energy sources (green energy)	100%	100%	94.27%	100%	100%
Total primary energy consumption (GJ)	13,205	13,181	19,566	15,580	15,550
Total natural gas consumption (GJ) ³	10,566	9,344	15,501	10,465	10,841
Total liquid fuel (diesel and petrol) consumption (GJ)	2,639	3,837	4,065	5,115	4,709
Total electricity consumption (GJ) ⁴	345,087	357,357	381,152	312,950	326,127

1. Data for Bankia, S.A.

2. All water supplied is through the mains networks. Actual consumption for the Las Rozas, P. Castellana, 189 buildings in Madrid, the Pintor Sorolla building in Valencia, Triana, 20 in Las Palmas, Miguel Villanueva 9 in Logroño, the El Cubo building in Granada and the General Salzillo building in Murcia. Other facilities: Consumption estimated based on bills.

3. Figures for gas consumption in 2018 and 2019 include a new building (El Cubo in Granada) within Bankia's perimeter following the integration of BMN.

4. 100% of the electric energy acquired comes from renewable sources (green energy with guarantees of origin). The BMN offices were added to Bankia's green energy supply contract in April 2018.

Emissions (tCO₂) ¹

Scope 1 ^{2 3}	2020	2019	2018	2017	2016
Direct CO ₂ e emissions from natural gas consumption	604.1	534.2	886.2	595.2	616.6
Direct CO ₂ e emissions from fuel consumption	170.0	246.8	265.1	354.3	316.8
Direct CO ₂ e emissions from refrigerant gas recharging	1,766.3	2,103.0	2,611.8	2,914.5	2,810.1
Direct CO ₂ e emissions from business travel ⁴	442.4	643.8	600.9	681.7	705.0
Total emissions ^{2 3}	2,982.8	3,527.8	4,364.0	4,545.7	4,448.5

Scope 2	2020	2019	2018	2017	2016
Indirect CO ₂ e emissions from electricity consumption ⁵	0.0	0.0	2,418.7	0.0	0.0
Total emissions	0.0	0.0	2,418.7	0.0	0.0

Scope 3	2020	2019	2018	2017	2016
Indirect CO ₂ e emissions from business travel ⁶	1,028.7	2,689.8	3,353.7	2,352.0	2,366.5
Indirect CO ₂ e emissions from commutes ("Ofibus" bus branches)	301.6	324.4	300.2	298.2	294.4
Indirect CO ₂ e emissions from commutes (shared transport)	1.4	7.5	8.1	7.9	8.2
Indirect CO ₂ e emissions from consumption of paper (DIN A4) and printer cartridges	402.0	559.9	1,481.8	1,236.5	1,087.1
Indirect CO ₂ e emissions from water consumption	133.6	116.1	159.7	82.7	84.1
Indirect CO ₂ e emissions from waste management	12.6	19.3	22.5	23.9	26.2
Total emissions	1,879.9	3,717.0	5,326.0	4,001.2	3,866.5

Other emissions ⁷	2020	2019	2018	2017	2016
CO emissions	0.17	0.16	0.24	0.19	0.19
NOx emissions	1.27	1.19	1.82	1.40	1.41

1. Information relating to Bankia, S.A. In 2018, Bankia integrated Banco Mare Nostrum. This resulted in a general increase in CO₂ emissions due to the larger number of offices and buildings managed, and in the total number of employees. However, Bankia has been working on corrective measures to reverse this trend since the integration. The results of these efforts are shown in this table.
2. Sources of emissions factors used: GHG Inventory Report 1990-2017 (2019), DEFRA 2020, Carbon Footprint, Offset and Carbon Dioxide Absorption Project Register, MITECO, 2020; GHG emissions calculation guide (2020) - Catalan Office for Climate Change, and Carbon Impact Studies: Toner Refills at Cartridge World – Comparative Carbon Footprints (2008).
3. Figures based on the 100-year global warming potentials published in the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC) (2013).
4. Includes emissions from employees' business travel in leased vehicles. In 2017, following the criteria laid down by MITECO for the registration of Bankia's carbon footprint, these emissions were reclassified from Scope 3 to Scope 1.
5. In 2020, 100% of the electric energy acquired comes from renewable energy sources (green energy with guarantees of origin). Bankia has prevented the emission of 29,716 tonnes of CO₂. Source: Sistema de Garantía de Origen y Etiquetado de la Electricidad (Electricity Labelling and Source Guarantee System) (2019). National Markets and Competition Commission.
6. This includes emissions from employees' business trips by plane, train, coach and ship, and from employees' travel in their own vehicle for work purposes.
7. Source: CORINAIR 2007.

Waste management (t) ¹

Non-hazardous waste sent for reuse and/or recycling	2020	2019	2018	2017	2016
Paper waste	343.4	454.56	596.80	613.93	688.99
Electronic waste	217.7	384.45	370.73	419.01	498.32
Toner waste	12.61	36.19	51.21	35.37	38.39
Battery waste	0,00	0.00	0.00	0.10	0.21
Packaging waste	17.34	29.95	33.17	26.91	19.75
Glass waste	0.62	0.88	0.89	0.86	0.46
Vegetable oil waste	0.03	0.03	0.05	0.06	0.05

Non-hazardous waste sent to landfill	2020	2019	2018	2017	2016
Portable electronic device waste	0.00	0.00	0.09	0.67	0.06

Hazardous waste generated	2020	2019	2018	2017	2016
Hazardous waste handled by an authorised waste management company and recycled	0.073	0.703	0.10	0.53	0.65
Hazardous waste handled by an authorised waste management company and sent to a secure landfill	0.016	0.004	0.02	0.04	0.03

1. Data for Bankia, S.A.

APPENDIX I

Table of contents. Law 11/2018 of 28 December

Table of contents required under Law 11/2018, of 28 December, amending Spain's Code of Commerce, the consolidated text of the Spanish Companies Act, enacted by Royal Legislative Decree 1/2010, of 2 July, and Spain's Audit Law 22/2015, regarding the disclosure of non-financial and diversity information.

General issues

Areas		Reporting criteria	Section and subsection / Direct response
Business model	Description of the business model - Business environment - Organisation and structure - Markets served - Objectives and strategies - Key factors and trends that could affect future performance	GRI 102-2 GRI 102-3 GRI 102-4 GRI 102-6 GRI 102-7 GRI 102-14 GRI 102-15	- Strategy - Customer focus o Business model
Key risks and impacts identified	Risk management	GRI 102-15	- Strategy o 2019-2020 RMP - Responsible banking o Sustainable financing o Human rights - Robustness and security: o Risk management
	Assessment of risks and impacts related to key topics	GRI 102-44	- Strategy o 2019-2020 RMP - Responsible banking o Sustainable financing o Human rights - Robustness and security • Risk management

Environmental issues

Areas		Reporting criteria	Section and subsection / Direct response
Environmental management	Current and foreseeable effects of the company's operations	GRI 102-15	- Commitment to the environment o Direct environmental impact
	Environmental assessment or certification procedures	Internal framework: qualitative description of the environmental assessment or certification procedures	- Commitment to the environment o Direct environmental impact
	Resources allocated to preventing environmental risks	Internal framework: qualitative description of the resources allocated to preventing environmental risks.	- Commitment to the environment o Direct environmental impact

	Application of the precautionary principle	GRI 102-11	- Commitment to the environment o Direct environmental impact
	Amount of provisions and safeguards for environmental risks	Internal framework: qualitative description of the amount of provisions and safeguards for environmental risks.	- Commitment to the environment o Direct environmental impact
Pollution	Measures to prevent, mitigate or remediate the effects of carbon emissions (also includes noise and light pollution)	GRI 103-2	- Commitment to the environment o Direct environmental impact
Circular economy and waste prevention and management	Prevention, recycling and reuse measures, other methods of recovering and eliminating waste	GRI 306-2	- Commitment to the environment o Direct environmental impact
	Actions to combat food waste	GRI 306-2	This aspect is not material for the Bankia Group.
Sustainable use of resources	Consumption of water and water supply in accordance with local limitations	GRI 303-5(2018)	- Commitment to the environment o Direct environmental impact: Environmental indicators
	Consumption of raw materials and measures adopted to enhance the efficiency of their use	GRI 301-1	- Commitment to the environment o Direct environmental impact: Environmental indicators
	Direct and indirect energy consumption	GRI 302-1 GRI 302-3	- Commitment to the environment o Direct environmental impact: Environmental indicators
	Measures taken to improve energy efficiency	Internal framework: qualitative description of measures taken to improve energy efficiency.	- Commitment to the environment o Direct environmental impact: Environmental indicators
	Use of renewable energies	GRI 302-1	- Commitment to the environment o Direct environmental impact: Environmental indicators
Climate change	Key elements of the greenhouse gas emissions generated	GRI 305-1 GRI 305-3 GRI 305-4	- Commitment to the environment o Direct environmental impact: Environmental indicators
	Measures in place to adapt to the consequences of climate change	Internal framework: qualitative description of measures in place to adapt to the consequences of climate change	- Responsible banking o Sustainable financing - Commitment to the environment o Direct environmental impact
	Voluntary reduction targets	GRI 305-5	- Commitment to the environment o Direct environmental impact: Environmental indicators
Protection of biodiversity	Measures taken to preserve or restore biodiversity	GRI 304-3	This aspect is not material for the Bankia Group.

	Impacts caused by activities or operations in protected areas	GRI 304-1 GRI 304-2	This aspect is not material for the Bankia Group.
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Social and employee-related matters

	Areas	Reporting criteria	Section and subsection / Direct response
Employment	Total number of employees and distribution by gender, age, country and professional category	GRI 102-8 GRI 405-1	- Responsible banking • People and talent management: Equality Plan
	Total number and distribution of types of employment contract	GRI 102-8	- Responsible banking • People and talent management: Employment indicators
	Average annual number of permanent, temporary and part-time contracts by gender, age and professional category	GRI 102-8	- Responsible banking - People and talent management: Employment indicators
	Number of dismissals by gender, age and professional category	GRI 401-1	- Responsible banking • People and talent management: Employment indicators
	Gender pay gap	GRI 405-2	- Responsible banking • People and talent management: Remuneration policy
	Average remuneration by gender, age and professional category	GRI 405-2	- Responsible banking • People and talent management: Remuneration policy
	Average remuneration of directors by gender	GRI 102-35	- Responsible banking • Corporate governance: Board remuneration
	Average remuneration of senior executives by gender	GRI 102-35	- Responsible banking • People and talent management: Remuneration policy
	Implementation of policies on disconnecting from work	Internal framework: qualitative description of the implementation of policies on disconnecting from work.	- Responsible banking • People and talent management: Work-life balance and measures to encourage suitable sharing of responsibilities between both parents
	Employees with disabilities	GRI 405-1	- Responsible banking • People and talent management: Measures to integrate people with disabilities and enable access
Work organisation	Organisation of work schedule	Internal framework: qualitative description of the organisation of the work schedule	- Responsible banking • People and talent management: Work-life balance and measures to encourage suitable sharing of responsibilities between both parents
	Number of hours of absenteeism	Internal framework: qualitative description of number of hours of absenteeism.	- Responsible banking • People and talent management: Safety, health and well-being
	Measures aimed at facilitating a work-life balance and encouraging suitable sharing of responsibilities between both parents	GRI 401-2 GRI 401-3	- Responsible banking • People and talent management: Work-life balance and measures to encourage suitable sharing of responsibilities between both parents

Health and safety	Occupational health and safety conditions	Internal framework: qualitative description of occupational health and safety conditions	- Responsible banking • People and talent management: Safety, health and well-being
	Number of work-related accidents and ill health by gender, frequency and severity	GRI 403-9	- Responsible banking • People and talent management: Safety, health and well-being
Social relationships	Organisation of social dialogue, including procedures for notifying, consulting and negotiating with staff	Internal framework: Qualitative description of the organisation of social dialogue	- Responsible banking • People and talent management: Labour agreements, collective bargaining and freedom of association
	Percentage of employees covered by collective bargaining agreements, by country	GRI 102-41	- Responsible banking • People and talent management: Other people indicators
	Assessment of collective bargaining agreements, particularly in the field of occupational health and safety	GRI 403-4 (2018)	- Responsible banking • People and talent management: Other people indicators
Training	Training policies in place	GRI 404-2	- Responsible banking • People and talent management: 2020 Training plan
	Total hours of training by professional category	GRI 404-1	- Responsible banking • People and talent management: 2020 Training plan
Universal access	Universal access for people with disabilities	Internal framework: qualitative description of measures for universal access for people with disabilities	- Responsible banking • People and talent management: Measures to integrate people with disabilities and enable access
Equality	Measures adopted to promote equal treatment and opportunities for men and women	Internal framework: qualitative description of measures adopted to promote equal treatment and opportunities for men and women.	- Responsible banking • People and talent management: Talent and diversity management
	Equality plans, job stimulation measures, protocols against sexual harassment and gender bias	Internal framework: qualitative description of equality plans.	- Responsible banking • People and talent management: Equality plan
	Integration and universal access for people with disabilities	GRI 405-1	- Responsible banking • People and talent management: Measures to integrate people with disabilities and enable access
	Policies against all forms of discrimination and, as the case may be, diversity management	Internal framework: qualitative description of policies against all forms of discrimination	- Responsible banking • Ethics and integrity • People and talent management: Equality plan

Information on respect for human rights

Areas	Reporting criteria	Section and subsection / Direct response
Implementation of human rights due diligence procedures	GRI 102-16 GRI 102-17	- Responsible banking • Human rights

Prevention of risks of human rights violations and, where applicable, measures to mitigate, manage and redress any such violations	GRI 102-16 GRI 102-17 GRI 4012-2	<ul style="list-style-type: none"> - Responsible banking <ul style="list-style-type: none"> • Ethics and integrity • Human rights • People and talent management • Responsible purchasing - Customer focus <ul style="list-style-type: none"> • Accessibility and financial inclusion • Effective management of non-performing loans - Commitment to the environment <ul style="list-style-type: none"> • Social contribution
Reports of human rights violations	GRI 406-1	No incidents of non-compliance related to this topic were identified.
Promotion of and compliance with the provisions of the core conventions of the International Labour Organisation with regard to respect for freedom of association and the right to collective bargaining; elimination of discrimination in employment and occupation; elimination of forced or compulsory labour; effective abolition of child labour	GRI 407-1 GRI 408-1 GRI 409-1	<ul style="list-style-type: none"> - Responsible banking <ul style="list-style-type: none"> • Ethics and integrity • Human rights • People and talent management

Information on the fight against corruption and bribery

Areas	Reporting criteria	Section and subsection / Direct response
Measures adopted to prevent corruption and bribery	GRI 102-16 GRI 102-17 GRI 205-2 GRI 205-3	<ul style="list-style-type: none"> - Robustness and security <ul style="list-style-type: none"> • Internal control and compliance - Responsible banking <ul style="list-style-type: none"> • Ethics and integrity
Anti-money laundering measures	GRI 102-16 GRI 102-17 GRI 205-2 GRI 205-3	<ul style="list-style-type: none"> - Robustness and security <ul style="list-style-type: none"> • Internal control and compliance
Contributions to foundations and not-for-profit organisations	GRI 203-2 GRI 204-1	<ul style="list-style-type: none"> - Commitment to the environment <ul style="list-style-type: none"> • Social contribution

Information about the company

Areas	Reporting criteria	Section and subsection / Direct response
Company commitments to sustainable development	Impact of the Company's activity on local employment and development	<ul style="list-style-type: none"> - Customer focus <ul style="list-style-type: none"> • Business model - Commitment to the environment <ul style="list-style-type: none"> • Social contribution
	Impact of the company's activity on local populations and the local area	<ul style="list-style-type: none"> - Customer focus <ul style="list-style-type: none"> • Business model • Accessibility and financial inclusion - Commitment to the environment <ul style="list-style-type: none"> • Social contribution

	Relationships with key members of local communities and the various forms of engaging them	GRI 102-43 GRI 201-1	<ul style="list-style-type: none"> - Strategy <ul style="list-style-type: none"> • 2019-2020 RMP - Responsible banking <ul style="list-style-type: none"> • Transparency of information - Commitment to the environment <ul style="list-style-type: none"> • Social contribution
	Association or sponsorship initiatives	GRI 102-12 GRI 102-13	<ul style="list-style-type: none"> - Commitment to the environment <ul style="list-style-type: none"> • Social contribution
Sub-contractors and suppliers	Inclusion of social, gender equality and environmental concerns in the purchasing policy	Internal framework: quantitative description of purchasing policies relating to social, gender-equality and environmental issues.	<ul style="list-style-type: none"> - Responsible banking <ul style="list-style-type: none"> • Responsible purchasing
	Consideration of social and environmental responsibility concerns in relations with suppliers and sub-contractors	GRI 308-1 GRI 414-1	<ul style="list-style-type: none"> - Responsible banking <ul style="list-style-type: none"> • Responsible purchasing
	Oversight and audit systems and results thereof	GRI 102-9	<ul style="list-style-type: none"> - Responsible banking <ul style="list-style-type: none"> • Responsible purchasing
Consumers	Consumer health and safety measures	Internal framework: qualitative description of consumer health and safety measures	<ul style="list-style-type: none"> - Robustness and solvency <ul style="list-style-type: none"> • Internal control and compliance - Customer focus <ul style="list-style-type: none"> • Responsible marketing
	Grievance systems	Internal framework: qualitative description of grievance systems.	<ul style="list-style-type: none"> - Customer focus <ul style="list-style-type: none"> • Responsible marketing
	Complaints received and resolution thereof	Internal framework: quantitative description of complaints received and resolution thereof	<ul style="list-style-type: none"> - Customer focus <ul style="list-style-type: none"> • Responsible marketing
Tax information	Country-by-country earnings	GRI 207-4 (2019)	<ul style="list-style-type: none"> - Robustness and solvency <ul style="list-style-type: none"> • Tax commitment
	Income tax paid	GRI 207-4 (2019)	<ul style="list-style-type: none"> - Robustness and solvency <ul style="list-style-type: none"> • Tax commitment
	Government grants received	GRI 207-4 (2019)	Bankia did not receive any government grants in 2020.

APPENDIX II

GRI standards content index

The scope of the independently reviewed non-financial information in this report is based on the comprehensive option of the Global Reporting Initiative Sustainability Reporting Standards (GRI Standards).

GRI STANDARD	Indicator	Reference / Direct response
GRI 102: GENERAL DISCLOSURES	ORGANIZATIONAL PROFILE	
	GRI 102-1 Name of the organization	Bankia
	GRI 102-2 Activities, brands, products, and services	Customer focus: - Business model
	GRI 102-3 Location of headquarters	Pintor Sorolla, 8. 46002 Valencia
	GRI 102-4 Location of operations	Bankia carries out all its banking operations in Spain. Customer focus: - Business model
	GRI 102-5 Ownership and legal form	Bankia is entered in the Valencia Mercantile Registry in Volume 9,341, Book 6,623, Page 104, Sheet V-17,274. It is a credit institution under the supervision of the Bank of Spain and is included in the Bank of Spain's Administrative Register under BE code number 2038 and BIC code: CAHMESMMXXX
	GRI 102-6 Markets served	Customer focus: - Business model
	GRI 102-7 Scale of the organization	Robustness and security: - Solvency and liquidity Responsible banking: - People and talent management Customer focus: - Business model
	GRI 102-8 Information on employees and other workers	Responsible banking: - People and talent management: • Employment indicators • Other people indicators
	GRI 102-9 Supply chain	Responsible banking: - Responsible purchasing
	GRI 102-10 Significant changes to the organization and its supply chain	Robustness and security: - Risk management: Management of risk related to the COVID-19 pandemic
	GRI 102-11 Precautionary Principle or approach	Commitment to the environment

GRI 102-12	External initiatives	Strategy: - Evolution of the 2019-2020 Responsible Management Plan
		Robustness and security - Tax commitment
GRI 102-13	Membership of associations	Responsible banking: - People and talent management: Talent and diversity management
		Commitment to the environment: - Direct environmental impact • Alliances and initiatives
GRI 102-13	Membership of associations	Strategy: - 2019-2020 RMP
		Robustness and security - Tax commitment
GRI 102-13	Membership of associations	Responsible banking: - Talent and diversity management
		Commitment to the environment: - Direct environmental impact • Alliances and initiatives

STRATEGY

GRI 102-14	Statement from senior decision-maker	Foreword: - Letter from the Chairman
		Robustness and security: - Tax commitment - Risk management
GRI 102-15	Key impacts, risks, and opportunities	Responsible banking: - Sustainable financing - Human rights - Responsible purchasing
		Customer focus: - Responsible marketing - Accessibility and financial inclusion - Effective management of non-performing loans
GRI 102-15	Key impacts, risks, and opportunities	Commitment to the environment

ETHICS AND INTEGRITY

GRI 102-16	Values, principles, standards, and norms of behaviour	Robustness and security: - Internal control and compliance
		Responsible banking: - Ethics and integrity
GRI 102-17	Mechanisms for advice and concerns about ethics	Responsible banking: - Corporate governance: • Corporate governance system - Ethics and integrity
		Customer focus: - Responsible marketing

GOVERNANCE

GRI 102-18	Governance structure	Responsible banking: - Corporate governance
GRI 102-19	Delegating authority	Robustness and security: - Risk management Responsible banking: - Corporate governance
GRI 102-20	Executive-level responsibility for economic, environmental, and social topics	Strategy: - Evolution of the 2019-2020 Responsible Management Plan Robustness and security: - Risk management Responsible banking: - Corporate governance - Sustainable financing
GRI 102-21	Consulting stakeholders on economic, environmental, and social topics	Strategy: - 2019-2020 Responsible Management Plan • Materiality Responsible banking: - Transparency of information
GRI 102-22	Composition of the highest governance body and its committees	Responsible banking: - Corporate governance: • Board of Directors
GRI 102-23	Chair of the highest governance body	Responsible banking: - Corporate governance: • Board of Directors
GRI 102-24	Nominating and selecting the highest governance body	Responsible banking: - Corporate governance: • Board of Directors • Corporate governance system
GRI 102-25	Conflicts of interest	Responsible banking: - Corporate governance: • Conflicts of interest
GRI 102-26	Role of highest governance body in setting purpose, values, and strategy	Responsible banking: - Corporate governance
GRI 102-27	Collective knowledge of highest governance body	Responsible banking: - Corporate governance: • Annual suitability assessment • Director competency matrix
GRI 102-28	Evaluating the highest governance body's performance	Responsible banking: - Corporate governance: • Annual assessment
GRI 102-29	Identifying and managing economic, environmental, and social impacts	Responsible banking: - Evolution of the 2019-2020 Responsible Management Plan
GRI 102-30	Effectiveness of risk management processes	Responsible banking: - Corporate governance: • Board of Directors Robustness and security: - Risk management

		Responsible banking: - Evolution of the 2019-2020 Responsible Management Plan
GRI 102-31	Review of economic, environmental, and social topics	Robustness and security: - Risk management Responsible banking: - Sustainable financing
GRI 102-32	Highest governance body's role in sustainability reporting	The Non-financial Information Statement is reviewed by the entity's Management Committee, Audit and Compliance Committee and Board of Directors, which is responsible for approving it as part of the authorisation for issue of the Bankia Group's consolidated financial statement.
GRI 102-33	Communicating critical concerns	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality
GRI 102-34	Nature and total number of critical concerns	Strategy: - Bankia does not have a system to compute and categorise the critical concerns raised during the year. • Materiality
GRI 102-35	Remuneration policies	Responsible banking: - Corporate governance: • Board remuneration
GRI 102-36	Process for determining remuneration	Responsible banking: - Corporate governance: • Board remuneration
GRI 102-37	Stakeholders' involvement in remuneration	Responsible banking: - Corporate governance: • Board remuneration
GRI 102-38	Annual total compensation ratio	Responsible banking: - People and talent management: • Remuneration policy
GRI 102-39	Percentage increase in annual total compensation ratio	Responsible banking: - This GRI does not apply because there has been no increase in the remuneration of the highest-paid individual.

STAKEHOLDER ENGAGEMENT

GRI 102-40	List of stakeholder groups	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality
GRI 102-41	Collective bargaining agreements	Responsible banking: - People and talent management: • Labour agreements, collective bargaining and freedom of association
GRI 102-42	Identifying and selecting stakeholders	Strategy: - Evolution of the 2019-2020 Responsible Management Plan

GRI 102-43 Approach to stakeholder engagement

Strategy:
- Evolution of the 2019-2020 Responsible Management Plan

Responsible banking:
- Transparency of information

GRI 102-44 Key topics and concerns raised

Strategy:
- Evolution of the 2019-2020 Responsible Management Plan
• Materiality

REPORTING PRACTICE

GRI 102-45 Entities included in the consolidated financial statements

The information contained in the Non-Financial Information Statement encompasses the Bankia Group's operations (with the same scope as the financial statement, see Appendix II Subsidiaries to the financial statement for further information) in 2020 in Spain, where it conducts all its business. It contains information that is presented in greater detail in other Bankia Group reports, such as the Annual Corporate Governance Report and the Remuneration Report. The information contained in the "People and talent management" section was prepared considering the Bankia, S.A. scope, except for the "2020 Training plan" which covers the Bankia Group scope.

GRI 102-46 Defining report content and topic Boundaries

Introduction

Strategy:
- Evolution of the 2019-2020 Responsible Management Plan
• Materiality

GRI 102-47 List of material topics

Strategy:
- Evolution of the 2019-2020 Responsible Management Plan
• Materiality

GRI 102-48 Restatements of information

There have been no changes to the scope of information or the reporting criteria applied with respect to the 2019 Non-Financial Information Statement.

GRI 102-49 Changes in reporting

There have been no significant changes from previous reports with regard to material topics and coverage

GRI 102-50 Reporting period

2020

GRI 102-51 Date of most recent report

2019

GRI 102-52 Reporting cycle

Annual

GRI 102-53 Contact point for questions regarding the report

rse@bankia.com

GRI 102-54 Claims of reporting in accordance with the GRI Standards

The 2020 Non-Financial Information Statement was prepared in accordance with the comprehensive option of the GRI Sustainability Reporting Standards.

GRI 102-55 GRI content index

2020 Non-Financial Information Statement, Appendix II

GRI 102-56 External assurance

Appendix III: Independent assurance report

INFORMATION SECURITY AND PRIVACY

GRI 103: MANAGEMENT APPROACH	GRI 103-1	Explanation of the material topic and its Boundary	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality Robustness and security: - Information security and privacy
	GRI 103-2	The management approach and its components	Robustness and security: - Information security and privacy
	GRI 103-3	Evaluation of the management approach	Robustness and security: - Information security and privacy
GRI 418: CUSTOMER PRIVACY	GRI 418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	No significant claims have been identified in this regard (one claim for an amount under EUR 60,000)

ETHICS AND INTEGRITY

GRI 103: MANAGEMENT APPROACH	GRI 103-1	Explanation of the material topic and its Boundary	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality Responsible banking: - Ethics and integrity
	GRI 103-2	The management approach and its components	Responsible banking: - Ethics and integrity
	GRI 103-3	Evaluation of the management approach	Responsible banking: - Ethics and integrity
GRI 102: GENERAL DISCLOSURES	GRI 102-16	Values, principles, standards, and norms of behavior	Responsible banking: - Ethics and integrity
	GRI 102-17	Mechanisms for advice and concerns about ethics	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Global Compact Responsible banking: - Ethics and integrity - Human rights
GRI 205: ANTI- CORRUPTION	GRI 205-1	Operations assessed for risks related to corruption	The Bankia Group has a Commercial Network Audit area, which is mainly charged with overseeing compliance with the policies, standards and procedures in place at any given time in the operational environment developed by the Retail Network and the Business Banking Network, covering all of the bank's transactions, as defined by the GRI indicator.
	GRI 205-2	Communication and training about anti-corruption policies and procedures	Robustness and security: - Internal control and compliance Responsible banking: - Ethics and integrity

	GRI 205-3	Confirmed incidents of corruption and actions taken	No incidents of corruption or sanctions within the remit of the entity's Ethics and Conduct Committee have been detected in 2020.
GRI 206: ANTI- COMPETITIVE BEHAVIOR	GRI 206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	No legal actions related to these topics were identified.
GRI 207: TAXATION	GRI 207-1	Tax approach	Security and robustness: - Tax commitment
	GRI 207-2	Tax governance, risk control and management	Security and robustness: - Tax commitment
	GRI 207-3	Involvement of stakeholders and management of concerns regarding tax	Security and robustness: - Tax commitment
	GRI 207-4	Country-by-country reporting	Security and robustness: - Tax commitment

TRANSPARENCY OF INFORMATION
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GRI 103: MANAGEMENT APPROACH	GRI 103-1	Explanation of the material topic and its Boundary	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality Responsible banking: - Transparency of information
	GRI 103-2	The management approach and its components	Responsible banking: - Transparency of information
	GRI 103-3	Evaluation of the management approach	Responsible banking: - Transparency of information

CORPORATE GOVERNANCE

GRI 103: MANAGEMENT APPROACH	GRI 103-1	Explanation of the material topic and its Boundary	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality Responsible banking: - Corporate governance
	GRI 103-2	The management approach and its components	Responsible banking: - Corporate governance
	GRI 103-3	Evaluation of the management approach	Responsible banking: - Corporate governance

SOLVENCY AND LIQUIDITY

GRI 103: MANAGEMENT APPROACH	GRI 103-1	Explanation of the material topic and its Boundary	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality Robustness and security: - Solvency and liquidity
	GRI 103-2	The management approach and its components	Robustness and security: - Solvency and liquidity
	GRI 103-3	Evaluation of the management approach	Robustness and security: - Solvency and liquidity
GRI 201: ECONOMIC PERFORMANCE	GRI 201-1	Direct economic value generated and distributed (in EUR thousand)	
		Gross income	€3,088,423.00
		Profit/(loss) after tax from discontinued operations	€0.00
		Gains on disposal of assets not classified as non-current assets held for sale	€2,302.00
		Direct economic value generated	€3,090,725.00
		Dividends	€0.00
		Operating costs	€485,938.00
		Staff expenses	€1,069,775.00
		Social investment	€22,974.83
		Income tax and other taxes	€110,956.00
		Direct economic value distributed	€1,689,643.83
		Direct economic value retained	€1,401,081.17
	GRI 201-2	Financial implications and other risks and opportunities due to climate change	Strategy: - Evolution of the 2019-2020 Responsible Management Plan Responsible banking: - Sustainable financing Commitment to the environment: - Direct environmental impact
	GRI 201-3	Defined benefit plan obligations and other retirement plans	Note 38.2 to the 2020 consolidated financial statements describes the features of the fund for pensions and similar obligations (obligations to employees) and insurance contracts linked to pensions. As described in Note 2.13, the Group has undertaken certain post-employment defined benefit obligations with its employees.
	GRI 201-4	Financial assistance received from government	Bankia did not receive any government grants in 2020.

RESPONSIBLE MARKETING

GRI 103: MANAGEMENT APPROACH	GRI 103-1	Explanation of the material topic and its Boundary	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality Customer focus: - Responsible marketing
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GRI 416: CUSTOMER HEALTH AND SAFETY	GRI 103-2	The management approach and its components	Customer focus: - Responsible marketing
	GRI 103-3	Evaluation of the management approach	Customer focus: - Responsible marketing
	GRI 416-1	Assessment of the health and safety impacts of product and service categories	Robustness and security: - Internal control and compliance: Customer focus: - Responsible marketing - Effective management of non-performing loans
	GRI 416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Not applicable. Not relevant for Bankia's business.
	GRI 417-1	Requirements for product and service information and labeling	Robustness and security: - Internal control and compliance: Customer focus: - Responsible marketing
	GRI 417-2	Incidents of non-compliance concerning product and service information and labeling	There is no evidence of any warnings being received in 2020 from the Bank of Spain or the Spanish National Securities Market Commission (CNMV) concerning risks of non-compliance in matters related to the labelling of products and services, understood as those associated with the obligation to classify financial products by level of risk, as required by Order ECC/2316/2015 of 4 November.
GRI 417: MARKETING AND LABELING	GRI 417-3	Incidents of non-compliance concerning marketing communications	As regards commercial communications issued, within the remit of Regulatory Compliance alongside the Corporate Branding Directorate, in 2020 a campaign was launched with a negative copy advice from Autocontrol. The risk of this campaign was pre-assessed by said Directorate in accordance with regulation, concluding that it met all marketing requirements. No other campaigns were launched with negative copy advice..
EFFECTIVE MANAGEMENT OF NON-PERFORMING LOANS			
GRI 103: MANAGEMENT APPROACH	GRI 103-1	Explanation of the material topic and its Boundary	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality Robustness and security: - Risk management Customer focus: - Effective management of non-performing loans
	GRI 103-2	The management approach and its components	Robustness and security: - Risk management Customer focus: - Effective management of non-performing loans

GRI 203: INDIRECT ECONOMIC IMPACTS	GRI 103-3	Evaluation of the management approach	Robustness and security: - Risk management Customer focus: - Effective management of non-performing loans
	GRI 203-1	Infrastructure investments and services supported	Responsible banking: - Sustainable financing Customer focus: - Business model • Business Banking
	GRI 203-2	Significant indirect economic impacts	Responsible banking: - Sustainable financing Customer focus: - Business model - Accessibility and financial inclusion
			Commitment to the environment: - Social contribution

**INNOVATION AND
DIGITALISATION**

GRI 103: MANAGEMENT APPROACH	GRI 103-1	Explanation of the material topic and its Boundary	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality Customer focus: - Innovation and digitalisation
	GRI 103-2	The management approach and its components	Customer focus: - Innovation and digitalisation
	GRI 103-3	Evaluation of the management approach	Customer focus: - Responsible marketing - Business model - Innovation and digitalisation

**COMPLIANCE AND RISK
MANAGEMENT**

GRI 103: MANAGEMENT APPROACH	GRI 103-1	Explanation of the material topic and its Boundary	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality Robustness and security: - Risk management
	GRI 103-2	The management approach and its components	Robustness and security: - Risk management
	GRI 103-3	Evaluation of the management approach	Robustness and security: - Risk management

TALENT MANAGEMENT

GRI 103: MANAGEMENT APPROACH	GRI 103-1	Explanation of the material topic and its Boundary	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality Responsible banking: - People and talent management
	GRI 103-2	The management approach and its components	Responsible banking: - People and talent management
	GRI 103-3	Evaluation of the management approach	Responsible banking: - People and talent management
GRI 401: EMPLOYMENT	GRI 401-1	New employee hires and employee turnover	Responsible banking: - People and talent management: • Employment indicators • Other people indicators
	GRI 401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Responsible banking: - People and talent management: • Employment indicators • Other people indicators
	GRI 401-3	Parental leave	Responsible banking: - People and talent management: • Other people indicators
GRI 404: TRAINING AND EDUCATION	GRI 404-1	Average hours of training per year per employee	Responsible banking: - People and talent management: • 2020 Training Plan
	GRI 404-2	Programs for upgrading employee skills and transition assistance programs	Responsible banking: - People and talent management
	GRI 404-3	Percentage of employees receiving regular performance and career development reviews	100%

ACCESSIBILITY AND FINANCIAL INCLUSION
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GRI 103: MANAGEMENT APPROACH	GRI 103-1	Explanation of the material topic and its Boundary	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality Customer focus: - Accessibility and financial inclusion
	GRI 103-2	The management approach and its components	Customer focus: - Business model - Accessibility and financial inclusion
	GRI 103-3	Evaluation of the management approach	Customer focus: - Responsible marketing - Accessibility and financial inclusion

SOCIAL CONTRIBUTION

GRI 103: MANAGEMENT APPROACH	GRI 103-1	Explanation of the material topic and its Boundary	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality Commitment to the environment: - Social contribution
	GRI 103-2	The management approach and its components	Commitment to the environment: - Social contribution
	GRI 103-3	Evaluation of the management approach	Commitment to the environment: - Social contribution
GRI 413: LOCAL COMMUNITIES	GRI 413-1	Operations with local community engagement, impact assessments, and development programs	The percentage is not reported since this does not apply to Bankia's business model. This indicator is addressed in the following section of the report: Commitment to the environment: - Social contribution
	GRI 413-2	Operations with significant actual and potential negative impacts on local communities	Not applicable. Not relevant for Bankia's business.

**INCLUSION OF
ENVIRONMENTAL AND SOCIAL
TOPICS IN THE BUSINESS**

GRI 103: MANAGEMENT APPROACH	GRI 103-1	Explanation of the material topic and its Boundary	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality Responsible banking: - Sustainable financing
	GRI 103-2	The management approach and its components	Responsible banking: - Sustainable financing Customer focus: - Business model • Bankia Asset Management: Commitment to responsible management
	GRI 103-3	Evaluation of the management approach	Responsible banking: - Sustainable financing Customer focus: - Business model • Bankia Asset Management: Commitment to responsible management

RESPONSIBLE PURCHASING

GRI 103: MANAGEMENT APPROACH	GRI 103-1	Explanation of the material topic and its Boundary	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality Responsible banking: - Responsible purchasing
	GRI 103-2	The management approach and its components	Responsible banking: - Responsible purchasing

	GRI 103-3	Evaluation of the management approach	Responsible banking: - Responsible purchasing
GRI 204: PROCUREMENT PRACTICES	GRI 204-1	Proportion of spending on local suppliers	Responsible banking: - Responsible purchasing
GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT	GRI 308-1	New suppliers that were screened using environmental criteria	Responsible banking: - Responsible purchasing • Supplier profile
	GRI 308-2	Negative environmental impacts in the supply chain and actions taken	Responsible banking: - Responsible purchasing • Responsible purchasing • Supplier profile
DIRECT ENVIRONMENTAL IMPACT			
GRI 103: MANAGEMENT APPROACH	GRI 103-1	Explanation of the material topic and its Boundary	Strategy: - Evolution of the 2019-2020 Responsible Management Plan • Materiality Commitment to the environment: - Direct environmental impact
	GRI 103-2	The management approach and its components	Commitment to the environment: - Direct environmental impact
	GRI 103-3	Evaluation of the management approach	Commitment to the environment: - Direct environmental impact
GRI 301: MATERIALS	GRI 301-1	Materials used by weight or volume	Commitment to the environment: - Direct environmental impact • Environmental indicators
	GRI 301-2	Recycled input materials used	Not applicable. Not relevant for Bankia's business.
	GRI 301-3	Reclaimed products and their packaging materials	Not applicable. Not relevant for Bankia's business.
GRI 302: ENERGY	GRI 302-1	Energy consumption within the organization	Commitment to the environment: - Direct environmental impact • Environmental indicators
	GRI 302-2	Energy consumption outside of the organization	Responsible banking: - Sustainable financing 23.08 GJ / employee
	GRI 302-3	Energy intensity	The calculation divided the total primary energy consumption and electricity consumption by Bankia's headcount at 31 December 2020.
	GRI 302-4	Reduction of energy consumption	Commitment to the environment: - Direct environmental impact • Environmental indicators
	GRI 302-5	Reductions in energy requirements of products and services	Not applicable. Not relevant for Bankia's business.

GRI 305: EMISSIONS	GRI 305-1	Direct (Scope 1) GHG emissions	Commitment to the environment: - Direct environmental impact • Environmental indicators
	GRI 305-2	Energy indirect (Scope 2) GHG emissions	Commitment to the environment: - Direct environmental impact • Environmental indicators
	GRI 305-3	Other indirect (Scope 3) GHG emissions	Commitment to the environment: - Direct environmental impact • Environmental indicators
			0.77 tCO ₂ / EUR million
	GRI 305-4	GHG emissions intensity	The calculation divided the total Scope 1 and 2 emissions by Bankia S.A.'s income (EUR 3,872.19 million).
	GRI 305-5	Reduction of GHG emissions	Commitment to the environment: - Direct environmental impact • Environmental indicators
	GRI 305-6	Emissions of ozone-depleting substances (ODS)	Not applicable. Not relevant for Bankia's business.
	GRI 305-7	Nitrogen oxides (NO _x), sulphur oxides (SO _x), and other significant air emissions	Commitment to the environment: - Direct environmental impact • Environmental indicators
GRI 306: WASTE	GRI 306-1	Waste generation and significant waste-related impacts	Commitment to the environment: - Direct environmental impact
	GRI 306-2	Management of significant waste-related impacts	Commitment to the environment: - Direct environmental impact • Environmental indicators
	GRI 306-3	Waste generated	Commitment to the environment: - Direct environmental impact • Environmental indicators
	GRI 306-4	Waste not destined for disposal	Commitment to the environment: - Direct environmental impact • Environmental indicators
	GRI 306-5	Waste destined for disposal	Not applicable. Not relevant for Bankia's business.
GRI 307: ENVIRONMENTAL COMPLIANCE	GRI 307-1	Non-compliance with environmental laws and regulations	No incidents of non-compliance related to this topic, understood as fines and/or non-monetary sanctions notified by the competent body from 1 January to 31 December 2020, have been identified.

ISSUER IDENTIFICATION DETAILS

YEAR END-DATE: [31/12/2020]

TAX ID (CIF): [A-14010342]

Company name:

[BANKIA, S.A]

Registered office:

[CL. PINTOR SOROLLA N.8 (VALENCIA)]

A. OWNERSHIP STRUCTURE

A.1. Complete the table below with details of the company's share capital:

Date of last change	Share capital (euros)	Number of shares	Number of voting rights
22/03/2019	3,069,522.105.00.	3,069,522.105.	3,069,522.105.

Indicate whether there are different classes of shares with different associated rights:

[] Yes

[✓] No

A.2. List the company's significant direct and indirect shareholders at year end, excluding directors:

Name or company name of shareholder	% of voting rights attached to the shares		% of voting rights through financial instruments		% of total voting rights
	Direct	Indirect	Direct	Indirect	
ARTISAN PARTNERS ASSET MANAGEMENT INC.	0.00.	3.07.	0.00.	0.00.	3.07.
FROB	0.00.	61.83.	0.00.	0.00.	61.83.
BLACKROCK INC.	0.00.	1.23.	0.00.	1.77.	3.00.

It should also be noted that State Street Bank and Trust and Chase Nominees Ltd., as international custodian/depository banks, appear in the Company's shareholder register as at 31 December 2020, with shareholdings of 4.56% and 4.35%, respectively, in Bankia's share capital. Nevertheless, the Company understands that these shareholdings are held on behalf of third parties, none of which, to the best of the Company's knowledge, has a shareholding equal to or greater than 3% of the share capital or voting rights.

Breakdown of the indirect holding:

Name or company name of the indirect owner	Name or company name of the direct owner	% of voting rights attached to the shares	% of voting rights through financial instruments	% of total voting rights
ARTISAN PARTNERS ASSET MANAGEMENT INC.	ARTISAN PARTNERS LIMITED PARTNERSHIP	3.07.	0.00.	3.07.
FROB	BFA, TENEDORA DE ACCIONES, S.A.U.	61.83.	0.00.	61.83.
BLACKROCK INC.	Funds controlled by BLACKROCK INC.	1.23.	1.77.	3.00.

Indicate the most significant changes in the shareholder structure during the year:

Most significant movements

BFA, TENEDORA DE ACCIONES, S.A.U.::

As a result of Bankia shares coming into BFA's hands by virtue of the enforcement of judgments and out-of-court settlements to avoid or end litigation, BFA TENEDORA DE ACCIONES S.A.U.'s stake in Bankia was increased by +3 bp to 61.83% over the course of the year.

BLACKROCK INC.:

21/05/2020 BLACKROCK INC. informed the CNMV that its stake exceeded 3% of the share capital (3.129%).

01/06/2020 BLACKROCK INC. informed the CNMV its stake had fallen below 3% of the share capital (2.725%).

26/08/2020 BLACKROCK INC. informed the CNMV that its stake exceeded 3% of the share capital (3.014%).

25/09/2020 BLACKROCK INC. informed the CNMV its stake had fallen below 3% of the share capital (2.988%).

22/12/2020 BLACKROCK INC. informed the CNMV that its stake exceeded 3% of the share capital (3.005%).

A.3. Complete the following tables on members of the company's Board of Directors holding voting rights on the company's shares:

Name or company name of Director	% of voting rights attached to the shares		% of voting rights through financial instruments		% of total voting rights	% of voting rights that <u>can be transferred</u> through financial instruments	
	Direct	Indirect	Direct	Indirect		Direct	Indirect
MR. JOSÉ IGNACIO GOIRIGOLZARRI TELLAECHÉ	0.01.	0.00.	0.00.	0.00.	0.01.	0.00.	0.00.
MR. JOSÉ SEVILLA ÁLVAREZ	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.
MR. JOAQUÍN AYUSO GARCÍA	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.
MR. FRANCISCO JAVIER CAMPO GARCÍA	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.
MRS. EVA CASTILLO SANZ	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.
MR. JORGE COSMEN MENÉNDEZ-CASTAÑEDO	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.
MR. CARLOS EGEA KRAUEL	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.
MR. JOSE LUIS FEITO HIGUERUELA	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.
MR. FERNANDO FERNÁNDEZ MÉNDEZ DE ANDÉS	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.
MRS LAURA GONZALEZ MOLERO	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.
MR. ANTONIO GREÑO HIDALGO	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.
MR. ANTONIO ORTEGA PARRA	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.	0.00.
Total percentage of voting rights held by the Board of Directors						0.01.	

Breakdown of the indirect holding:

Name or company name of Director	Name or company name of the direct owner	% of voting rights attached to the shares	% of voting rights through financial instruments	% of total voting rights	% of voting rights that can be transferred through financial instruments
MR. JORGE COSMEN MENÉNDEZ-CASTAÑEDO	QUINTORGE, S.L.	0.00.	0.00.	0.00.	0.00.

At 31 of December 2019, the directors of Bankia held the following shares of the Entity:

Mr. José Ignacio Goirigolzarri, direct owner of 271,091 shares of the Company (representing 0.008% of the share capital);
 Mr. José Sevilla Álvarez, direct owner of 66,933 shares of the Company (representing 0.002% of the share capital);
 Mr. Antonio Ortega Parra, direct owner of 86,921 shares of the Company (representing 0.002% of the share capital);
 Mr. Carlos Egea Krauel, direct owner of 15,595 shares of the Company (representing 0.001% of the share capital);
 Mr. Joaquín Ayuso García, direct owner of 55,015 shares of the Company (representing 0.002% of the share capital);
 Mr. Francisco Javier Campo García, direct owner of 50,315 shares of the Company (representing 0.002% of the share capital);
 Ms. Eva Castillo Sanz direct, owner of 25,000 shares of the Company (representing 0.001% of the share capital);
 Mr. Jorge Cosmen Menéndez-Castañedo, direct owner of 21 shares and indirect owner of (through Quintorge, S.L.) of 30,268 shares of the Company (representing 0.001% of the share capital);
 Mr. José Luis Feito Higuera, direct owner of 49,452 shares of the Company (representing 0.002% of the share capital);
 Mr. Fernando Fernández Méndez de Andés, direct owner of 16,358 shares of the Company (representing 0.001% of the share capital);
 Ms. Laura González Molero, direct owner of 5,000 shares of the Company (representing 0.0002% of the share capital);
 Mr. Antonio Greño Hidalgo, direct owner of 20,750 shares of the Company (representing 0.001% of the share capital);

A.4. If applicable, indicate any family, commercial, contractual or corporate relationships that exist among significant shareholders to the extent that they are known to the company, unless they are insignificant or arise in the ordinary course of business, with the exception of those reported in section A.6:6:

Name or company name of related party	Nature of relationship	Brief description
No data		

A.5. If applicable, indicate any commercial, contractual or corporate relationships that exist between significant shareholders and the company and/or its group, unless they are insignificant or arise in the ordinary course of business:

Name or company name of related party	Nature of relationship	Brief description
BFA, TENEDORA DE ACCIONES, S.A.U.	Contractual	Framework agreement governing the relations between BFA, Tenedora de Acciones S.A.U. (BFA) and Bankia, setting out the mechanisms necessary, within the legal limits, to ensure an appropriate level of coordination between Bankia and BFA and group companies at all times, and to manage and minimize any situations that may give rise to potential conflicts of interest between the two entities, while ensuring due respect for and protection of the rest of the shareholders in an atmosphere of transparency in dealings between the two entities.
BFA, TENEDORA DE ACCIONES, S.A.U.	Contractual	Service level agreement, a development of the framework agreement, enabling BFA to manage its activity appropriately using Bankia's human and material resources to prevent duplications.
BFA, TENEDORA DE ACCIONES, S.A.U.	Contractual	Cost-sharing agreement for lawsuits related to preference shares and subordinated bonds.
BFA, TENEDORA DE ACCIONES, S.A.U.	Contractual	Agreement establishing an access mechanism allowing BFA, through Bankia, to avail of the liquidity and funding mechanisms set up by the ECB for credit institutions, as well as other transactions inherent in the business of credit institutions.
BFA, TENEDORA DE ACCIONES, S.A.U.	Contractual	Cost-sharing agreement for lawsuits related to the IPO.
BFA, TENEDORA DE ACCIONES, S.A.U.	Contractual	BFA/Bankia cooperation protocol. Article 11 (2) of the CRR, the purpose of which is to govern the relations between BFA and Bankia with a view to defining and implementing the mechanisms and procedures necessary to permit Bankia to comply with the obligations laid down in 11.2 of Regulation (EU) number 575/2013 and, in particular, to ensure that BFA complies with the capital requirements imposed in applicable legislation.

Name or company name of related party	Nature of relationship	Brief description
BFA, TENEDORA DE ACCIONES, S.A.U.	Corporate	Agreement on the management of the FROB's indirect interest in Bankia, S.A. through BFA, Tenedora de Acciones, S.A.U:

A.6. Describe the relationships, unless insignificant for both parties, that exist between significant shareholders or shareholders represented on the Board and directors, or their representatives in the case of directors that are legal persons.

Explain, if applicable, how the significant shareholders are represented. Specifically, indicate those directors appointed to represent significant shareholders, those whose appointment was proposed by significant shareholders, or who are related to significant shareholders and/or companies in their group, specifying the nature of such relationships or ties. In particular, mention the existence, identity and post of any directors of the listed company, or their representatives, who are in turn members or representatives of members of the Board of Directors of companies that hold significant shareholdings in the listed company or in group companies of these significant shareholders.

Name or company name of related director or representative	Name or company name of related significant shareholder	Company name of the group company of the significant shareholder	Description of relationship / post
MR. JOSÉ IGNACIO GOIRIGOLZARRI TELLAECHÉ	BFA, TENEDORA DE ACCIONES, S.A.U.	BANKIA, S.A.	PHYSICAL PERSON REPRESENTATIVE CHAIRMAN (FROB)
MR. JOSÉ SEVILLA ÁLVAREZ	BFA, TENEDORA DE ACCIONES, S.A.U.	BANKIA, S.A.	DIRECTOR
MR. ANTONIO ORTEGA PARRA	BFA, TENEDORA DE ACCIONES, S.A.U.	BANKIA, S.A.	DIRECTOR

There are no proprietary directors on Bankia S.A.'s Board of Directors. The Board of Directors was made up of 13 directors at 31 December 2020, 3 executive, 9 independent and 1 external.

BFA Tenedora de Acciones S.A.U. held shares representing 61.829 % of Bankia's share capital at 31 December 2020.

Since 27 June 2012, BFA has been wholly owned by the FROB, an institution under public law with its own legal personality and full public and private capacity to pursue its objectives, and the purpose of which is to manage credit institution restructuring and resolution processes.

In any event, at the General Meeting of Shareholders of Bankia, S.A. held on 29 June 2012, under item 3 of the Agenda, the proposals for the appointment and ratification of directors were approved with 95% of all valid votes and abstentions in favour, equivalent to 57% of Bankia, S.A.'s share capital at the date of the meeting.

At the General Meeting of Shareholders held on 15 March 2016, resolutions were adopted to appoint a new independent director and to re-elect 4 directors: 3 independent and 1 executive.

In addition, at the General Meeting of Shareholders held on 24 March 2017, to continue with the partial renovation of members of the Board of Directors commenced in the previous year, resolutions were adopted to re-elect 6 directors: 2 executive and 4 independent.

In addition, at the Extraordinary General Meeting of Shareholders held on 14 September 2017, pursuant to the Common Terms of Merger executed between Bankia, S.A. and Banco Mare Nostrum, S.A., a resolution was adopted to appoint a new external director, Mr. Carlos Egea Krauel. He was included on the Bank of Spain's Register of Senior Officers (Registro de Altos Cargos or RAC) on 12 January 2018. On 25 January 2018, this director changed category after being appointed executive director. In 2019, Mr. Egea resigned from his executive duties and since 28 June 2019 has been an external director.

To fill the vacancy arising in October 2017 as a result of the departure of an independent director, on 25 October 2018, after obtaining the pertinent regulatory authorisations, the Board of Directors agreed to appoint Mrs. Laura González Molero as independent director by means of co-optation. The appointment of Ms. González Molero was ratified by the shareholders at the General Meeting of 22 March 2019.

Finally, at the General Meeting of Shareholders held on 27 March 2020, it was resolved to appoint Ms. Nuria Oliver Ramirez as independent director of the Company. At the same General Meeting, it was also resolved to reappoint Mr. José Sevilla Álvarez as executive director, and Mr. Joaquín Ayuso García, Mr. Francisco Javier Campo García, Ms. Eva Castillo Sanz and Mr. Antonio Greño Hidalgo, as independent directors.

Agreement on the management of the FROB's indirect interest in Bankia, S.A. through BFA, Tenedora de Acciones, S.A.U:

On 25 January 2019, the FROB (holder of 100% of BFA's share capital), BFA (controlling shareholder of Bankia) and Bankia signed an agreement on the management of the FROB's indirect interest in Bankia (through BFA). Under the above agreement, the FROB undertook not to take part in the ordinary management of Bankia, which is the responsibility of Bankia's governing bodies and will be freely and independently exercised by Bankia's directors. Hence the FROB, through BFA, will not nominate proprietary directors for appointment to Bankia's Board of Directors as provided for in Article 529 duodecies (3) of Royal Legislative Decree 1/2010, of 2 July, approving the revised Corporate Enterprises Act.

A.7. Indicate whether the company has been notified of any shareholders' agreements that may affect it, in accordance with the provisions of Articles 530 and 531 of the Spanish Corporate Enterprises Act. If so, describe them briefly and list the shareholders bound by the agreement:

[] Yes
[✓] No

Indicate whether the company is aware of any concerted actions among its shareholders. If so, provide a brief description:

[] Yes
[✓] No

If any of the aforementioned agreements or concerted actions have been amended or terminated during the year, indicate this expressly:

Not applicable.

A.8. Indicate whether any individual or company exercises or may exercise control over the company in accordance with Article 5 of the Securities Market Act. If so, identify them:

[✓] Yes
[] No

Name or company name
BFA, TENEDORA DE ACCIONES, S.A.U.

BFA Tenedora de Acciones, S.A.U held shares representing 61.829% of Bankia, S.A.'s share capital at 31 December 2020.

The Fund for Orderly Bank Restructuring (FROB) holds 100% of BFA, Tenedora, S.A.U's shares.

A.9. Complete the following table with details of the company's treasury shares:

At the close of the year:

Number of direct shares	Number of indirect shares (*)	Total percentage of share capital
31,985.200.		1.04.

(*) Through:

Name or company name of direct shareholder	Number of direct shares
No data	

Explain any significant changes during the year:

Explain significant changes

Notification to the CNMV on 13/05/2020: Acquisitions with treasury shares reached the 1% threshold at 11/05/2020. At that date, the total position in treasury shares (29,205,776) amounted to 0.951% of share capital.

Based on privileged information published at the CNMV on 03/09/2020, on the analysis of the merger between Bankia and CaixaBank, Bankia's treasury share transactions in the market have ceased.

A.10. Provide a detailed description of the conditions and terms of the authority given to the Board of Directors to issue, repurchase, or dispose of treasury shares:

On 27 March 2020, a resolution was adopted at the General Meeting of Shareholders of Bankia, S.A. to grant "Authorisation to the Board of Directors for the derivative acquisition of treasury stock in accordance with the limits and requirements established in the Corporate Enterprises Act. Delegation of authority to the Board of Directors to implement this resolution, rendering without effect the delegation granted by the previous General Meeting":

To authorise the Board of Directors, on the broadest of terms, and per the provisions of article 146 of the Corporate Enterprises Act, to engage in the derivative acquisition of treasury shares of Bankia, directly or through companies in its Group, subject to the following limits and requirements:

- Forms of acquisition: acquisition by way of purchase, by way of any other "inter vivos" act for consideration or any other transaction permitted by law, including with a charge to profits for the fiscal year and/or unrestricted reserves.
- Maximum number of shares to be acquired: acquisitions may be made, from time to time, on one or more occasions, up to the maximum permitted by law.
- The price or countervalue will vary from a minimum equal to the lesser of par value or 75% of the stock market price on the date of acquisition, and a maximum equal to up to 5% more than the maximum price achieved for the shares in free trading (including the block market) in the Continuous Market session on the date of acquisition.
- Duration of the authorisation: five (5) years from the date of this resolution.

These transactions shall also be conducted in compliance with the rules in this regard contained in Bankia's Internal Rules of Conduct for Securities Markets Activities.

To authorise the Board of Directors so that it may sell the shares acquired or use the treasury shares acquired, in whole or in part, to implement remuneration schemes that have as their purpose or entail delivery of shares or option rights on shares, in accordance with the provisions of section 1 a) of article 146 of the Corporate Enterprises Act.

This delegation of authority to the Board of Directors replaces the delegation granted by the General Meeting of Shareholders of the Company held on 22 March 2019, which will therefore be rendered void.

The Board of Directors is authorised, on the broadest of terms, to use the authorisation covered by this resolution for full implementation and development thereof, it being entitled to delegate this authority, without distinction and as extensively as it sees fit, to the Executive Chairman, to any of the directors, to the General Secretary and to the Board Secretary or to any other such person as the Board expressly authorises for this purpose.

A.11. Estimated floating capital:

	%
Estimated floating capital	37.11.

The percentage free float reported was calculated after subtracting the percentage of capital held at 31 December 2020 by BFA Tenedora de Acciones S.A.U. - BFA (61.829%), as controlling shareholder, by members of the Board of Directors (0.023%) and by the Company in treasury shares (1.042%).

As to significant shareholders, only BFA has been considered a major shareholder (core). Other shareholders do not qualify as they are not major shareholders, their stakes have varied considerably over time and their exact ownership interest cannot be ascertained because they buy shares through different custodians.

However, for information purposes only, the free float resulting from also subtracting the interests owned by the other two shareholders that had disclosed significant shareholdings to the CNMV at 31 December 2020 (Artisan Partners Asset Management Inc., holding 3.07% and Blackrock Inc. holding 3.005%) is 31.032%.

The same criterion has been used to complete section B.4.

A.12. Indicate whether there are any restrictions (articles of incorporation, legislative or of any other nature) placed on the transfer of shares and/or any restrictions on voting rights. In particular, indicate the existence of any type of restriction that may inhibit a takeover of the company through acquisition of its shares on the market, as well as such regimes for prior authorisation or notification that may be applicable, under sector regulations, to acquisitions or transfers of the company's financial instruments.

[☒] Yes
[☐] No

Description of restrictions

There are no restrictions on the transfer of securities of the entity except for the statutory restrictions.

Pursuant to article 17 of Law 10/2014 of 26 June 2014, on Governance, Supervision and Solvency of Credit Institutions, any natural or legal person which, acting alone or in collaboration with others, decides to directly or indirectly acquire a significant share in a Spanish credit institution or directly or indirectly increase its interest therein such that the percentage of voting rights or capital held therein equals or exceeds 20%, 30% or 50%, or such that control of the credit institution could be gained through the acquisition, must first notify the Bank of Spain, indicating the amount of the expected investment and any other information required by regulations. This information must be relevant for the evaluation, and proportional and appropriate to the nature of the potential acquirer and the proposed acquisition.

There are no statutory or bylaw restrictions on the exercise of voting rights. Article 32.2 of the Bylaws states that those attending the General Meeting will be entitled to one vote for each share owned or represented.

A.13. Indicate whether the general shareholders' meeting has resolved to adopt measures to neutralise a takeover bid by virtue of the provisions of Law 6/2007.

☐ Yes
☒ No

If so, explain the measures approved and the terms under which such limitations would cease to apply:

A.14. Indicate whether the company has issued shares that are not traded on a regulated EU market.

☐ Yes
☒ No

If so, indicate each share class and the rights and obligations conferred.

B. GENERAL SHAREHOLDERS' MEETING

B.1. Indicate whether there are any differences between the minimum quorum regime established by the Spanish Corporate Enterprises Act for General Shareholders' Meetings and the quorum set by the company, and if so give details.

☐ Yes
☒ No

B.2. Indicate whether there are any differences between the company's manner of adopting corporate resolutions and the regime provided for in the Spanish Corporate Enterprises Act and, if so, give details:

☐ Yes
☒ No

B.3. Indicate the rules for amending the company's articles of incorporation. In particular, indicate the majorities required for amendment of the articles of incorporation and any provisions in place to protect shareholders' rights in the event of amendments to the articles of incorporation.

The rules governing amendments to the Company's Bylaws are those set forth in the Corporate Enterprises Act. Any amendment to the Bylaws is the responsibility of the General Meeting of Shareholders and will require, at first call, shareholders holding at least fifty percent of the subscribed share capital conferring voting rights to be present in person or by proxy. At second call, shareholders representing twenty-five percent of the share capital shall be sufficient.

In particular, resolutions to amend the Bylaws may be adopted by an absolute majority if shareholders representing over fifty percent of the share capital are present or represented by proxy at the General Meeting. However, a favourable vote of a two-thirds majority of the share capital present or represented at the meeting is required where, at second call, shareholders representing at least twenty-five percent but less than fifty percent of the subscribed capital with voting rights are in attendance.

In addition, according to 31.1 of the Bylaws, in line with article 197 bis of the Corporate Enterprises Act, in the case of amendment of the Bylaws, separate votes must be held on the amendment of each article or group of articles that is independent of the others, even where they appear in the same agenda item.

Moreover, article 3.1 of the Bylaws states that the Board of Directors has authority to resolve to change the registered office within the same municipality.

B.4. Give details of attendance at General Shareholders' Meetings held during the reporting year and the two previous years:

Date of general meeting	Attendance data				Total
	% physically present	% distance voting proxy	Electronic voting	Other voting	
10/04/2018	61.84	16.07	0.01	0.38	78.30
Of which floating capital:	0.04	16.07	0.01	0.38	16.50
22/03/2019	62.87	17.09	0.01	0.35	80.32
Of which floating capital:	0.45	17.09	0.01	0.35	17.90
27/03/2020	63.13	18.62	0.01	0.14	81.90
Of which floating capital:	0.45	18.62	0.01	0.14	19.22
01/12/2020	62.90	17.05	0.02	0.19	80.16
Of which floating capital:	0.03	17.05	0.02	0.19	17.29

The percentage free float reported was calculated after subtracting the percentage of capital held by BFA, as controlling shareholder, that held by members of the Board of Directors, and that held by the Company in treasury shares, at the date of the General Meetings indicated in the heading.

As regards the percentage of shareholders attending the General Meeting held on 27 March 2020 in person, as a result of the state of emergency declared by Royal Decree 463/2020 of 14 March 2020, and the provisions of Royal Decree-Law 8/2020, of 17 March 2020, on extraordinary urgent measures to address the economic and social impact of Covid-19, the Meeting was held with the shareholders and shareholders' representatives attending electronically.

As regards the percentage of shareholders attending the Extraordinary General Meeting held on 1 December 2020 in person, this meeting was held with shareholders and shareholders' representatives attending both in person and electronically.

B.5. Indicate whether any point on the agenda of the General Shareholders' Meetings during the year was not approved by the shareholders for any reason.

[] Yes
[☒] No

B.6. Indicate whether the articles of incorporation contain any restrictions requiring a minimum number of shares to attend General Shareholders' Meetings, or to vote remotely:

[☒] Yes
[] No

Number of shares required to attend General Meetings	500
Number of shares required for voting remotely	1

B.7. Indicate whether it has been established that certain decisions, other than those established by law, entailing an acquisition, disposal or contribution to another company of essential assets or other similar corporate transactions must be submitted for approval to the General Shareholders' Meeting.

[] Yes
[☒] No

B.8. Indicate the address and manner of access on the company's website to information on corporate governance and other information regarding General Shareholders' Meetings that must be made available to shareholders through the company website.

The Company's website address is: www.bankia.com, the domain name of which is entered at the Mercantile Registry.

In accordance with article 52 of the Bylaws of Bankia, S.A., the Company must have, for the purposes envisaged in the applicable laws, a website (www.bankia.com) through which its shareholders, investors and the market in general will be advised of material or significant matters related to the Company, and any notices it may legally be required to publish.

On the Company's website, upon call of general meetings, an electronic shareholder forum must be set up, to which both individual shareholders and such voluntary associations as they may establish on the terms contemplated by law must have appropriately secure access, to facilitate their communication prior to the holding of general meetings.

In this respect, the www.bankia.com home page includes a menu with a heading entitled "Shareholders and Investors" which has a "Corporate Governance and Remuneration Policies" section containing information on the entity's corporate governance. This section contains a specific sub-section providing access to the entity's annual corporate governance reports, and one providing access to documentation regarding the General Meeting of Shareholders among others containing information on corporate governance at the Company.

The Company website can be accessed in Spanish and English.

C. STRUCTURE OF THE COMPANY'S ADMINISTRATION

C.1. Board of Directors

C.1.1 Maximum and minimum number of directors established in the articles of incorporation and the number set by the general meeting:

Maximum number of directors	15
Minimum number of directors	5
Number of directors set by the general meeting	13

C.1.2 Complete the following table on Board members:

Name or company name of director	Representative	Category of director	Position on the board	Date first appointed	Date of last appointment	Election procedure
MR. JOSÉ IGNACIO GOIRIGOLZARRI TELLAECHÉ		Executive	CHAIRMAN	09/05/2012	24/03/2017	RESOLUTION OF GENERAL MEETING OF SHAREHOLDERS
MR. JOSÉ SEVILLA ÁLVAREZ		Executive	CHIEF EXECUTIVE OFFICER	25/05/2012	27/03/2020	RESOLUTION OF GENERAL MEETING OF SHAREHOLDERS
MR. JOAQUÍN AYUSO GARCÍA		Independent	DIRECTOR	25/05/2012	27/03/2020	RESOLUTION OF GENERAL MEETING OF SHAREHOLDERS
MR. FRANCISCO JAVIER CAMPO GARCÍA		Independent	DIRECTOR	25/05/2012	27/03/2020	RESOLUTION OF GENERAL MEETING OF SHAREHOLDERS
MRS. EVA CASTILLO SANZ		Independent	INDEPENDENT COORDINATING DIRECTOR	25/05/2012	27/03/2020	RESOLUTION OF GENERAL MEETING OF SHAREHOLDERS
MR. JORGE COSMEN MENÉNDEZ-CASTAÑEDO		Independent	DIRECTOR	25/05/2012	24/03/2017	RESOLUTION OF GENERAL MEETING OF SHAREHOLDERS
MR. CARLOS EGEA KRAUEL		Other external	DIRECTOR	14/09/2017	14/09/2017	RESOLUTION OF GENERAL MEETING OF SHAREHOLDERS

Name or company name of director	Representative	Category of director	Position on the board	Date first appointed	Date of last appointment	Election procedure
MR. JOSÉ LUIS FEITO HIGUERUELA		Independent	DIRECTOR	25/05/2012	24/03/2017	RESOLUTION OF GENERAL MEETING OF SHAREHOLDERS
MR. FERNANDO FERNÁNDEZ MÉNDEZ DE ANDÉS		Independent	DIRECTOR	25/05/2012	24/03/2017	RESOLUTION OF GENERAL MEETING OF SHAREHOLDERS
MRS LAURA GONZALEZ MOLERO		Independent	DIRECTOR	25/10/2018	25/10/2018	CO-OPTATION
MR. ANTONIO GREÑO HIDALGO		Independent	DIRECTOR	15/03/2016	27/03/2020	RESOLUTION OF GENERAL MEETING OF SHAREHOLDERS
MS. NURIA OLIVER RAMIREZ		Independent	DIRECTOR	27/03/2020	27/03/2020	RESOLUTION OF GENERAL MEETING OF SHAREHOLDERS
MR. ANTONIO ORTEGA PARRA		Executive	DIRECTOR	25/06/2014	24/03/2017	RESOLUTION OF GENERAL MEETING OF SHAREHOLDERS
Total number of directors			13			

Indicate any cessations, whether through resignation or by resolution of the general meeting, that have taken place in the Board of Directors during the reporting period:

Name or company name of director	Category of the director at the time of cessation	Date of last appointment	Date of cessation	Specialised committees of which he/she was a member	Indicate whether the director left before the end of his or her term of office
No data					

C.1.3 Complete the following tables on the members of the Board and their categories:

EXECUTIVE DIRECTORS		
Name or company name of Director	Post in organisation chart of the company	Profile
MR. JOSÉ IGNACIO GOIRIGOLZARRI TELLAECHÉ	EXECUTIVE CHAIRMAN	<p>Born in 1954, Mr. Goirigolzarri holds a degree in Economics and Business Studies from the Universidad Comercial de Deusto (Bilbao). Finance and Strategic Planning from the University of Leeds (United Kingdom). He has been Chairman of Bankia and BFA, Tenedora de Acciones, S.A.U. since 9 May 2012. He is also Chairman of the Bankia Technology and Innovation Committee. He is Vice Chairman of CECA, trustee of CEDE, Pro Real Academia Española Foundation and honorary trustee of the Spain-USA Board Foundation, Chairman of the Deusto Business School, Chairman of the Advisory Board of the Instituto Americano de Investigación Benjamin Franklin and Chairman of Garum Foundation.</p> <p>He is also Chairman of the Fundación Bankia por la Formación Dual. He began his professional career in Banco de Bilbao in 1977, where he served as general director of BBV and member of the Management Committee, with responsibilities in commercial banking in Spain and operations in Latin America. Mr. Goirigolzarri was responsible for Retail Banking at BBVA and served as Chief Executive Officer there until 2009. During that period he also held directorships in BBVA-Bancomer (Mexico), Citic Bank (China) and CIFIH (Hong Kong). He furthermore served as Vice Chairman at Telefónica and Repsol and was Spanish Chairman of the Spain-USA Foundation.</p>
MR. JOSÉ SEVILLA ÁLVAREZ	CHIEF EXECUTIVE OFFICER	<p>Born in 1964, Mr. Sevilla holds a degree in Economics and Business Studies from CUNEF. He is Chief Executive Officer of Bankia and Chairman of the Board Risk Committee. He is also a member of the Board of Directors of BFA, Tenedora de Acciones, S.A.U. Before joining Bankia he held various management positions in BBVA, where he served as general manager of Risks and member of the Management Committee, head of the Office of the Chairman and of the Division of Strategy and Finance for the Americas in BBVA and director of BBVA Bancomer. He is a director of the Asociación para el Progreso de la Dirección (APD). He began his professional career in the investment banking field, working at Merrill Lynch and FG Inversiones Bursátiles.</p>

MR. ANTONIO ORTEGA PARRA	EXECUTIVE DIRECTOR, AND GENERAL MANAGER OF PEOPLE, RESOURCES AND TECHNOLOGY	Born in 1947, Mr. Ortega has a PhD in Business Studies from the Antonio de Nebrija University and holds a degree in Law from the Universidad Nacional de Educación a Distancia. He is a member of the Board of Directors of Bankia and of its Technology and Innovation Committee. He has been general director of People, Resources and Technology at Bankia since 16 May 2012. He has been a member of the Board of Directors of BFA, Tenedora de Acciones, S.A.U. since June 2012. Before joining the bank, he was director of the Master's Degree in Human Resources at Centro de Estudios Garrigues and a member of its academic council. At the same time, he provided business consultancy services and was director of the School of Banking at the Universidad Virtual of the Instituto Tecnológico de Monterrey (Mexico). He spent a large part of his career at the BBVA Group, where he held various management positions. He has been a director of BBVA Bancomer and BBVA Continental, Vice Chairman of Banca Nazionale del Lavoro, general director of Human Resources and Quality at BBVA and a member of the Group's Management Committee. He is a trustee of the Fundación Bankia por la Formación Dual. He is also a director of Cecabank, S.A.
Total number of executive directors	3	
Percentage of Board	23.08	

EXTERNAL PROPRIETARY DIRECTORS		
Name or company name of Director	Name or company name significant shareholder represented or that nominated the director	Profile
No data		

EXTERNAL INDEPENDENT DIRECTORS	
Name or company name of Director	Profile
MR. JOAQUÍN AYUSO GARCÍA	Born in 1955, he holds a degree in Civil Engineering from Universidad Politécnica de Madrid. He is a member of the Board of Directors of Bankia and until March 2019 he was Independent Coordinating Director. He is Chairman of its Risk Advisory Committee and a member of its Appointments and Responsible Management Committee and of its Remuneration Committee. He has spent his professional career at Ferrovial, where he was Chief Executive Officer and Vice-Chairman of the Board of Directors. Currently, he is Chairman of Adriano Care Socimi. He was Chairman of Autopista del Sol, Concesionaria Española, and a member of the boards of directors of National Express Group PLC and Hispania Activos Inmobiliarios. He is a member of the Advisory Board of the Instituto Benjamin Franklin at the Universidad de Alcalá de Henares and of the advisory board of Kearney. He is also vice-Chairman of the management board of the Real Sociedad Hípica Española Club de Campo.
MR. FRANCISCO JAVIER CAMPO GARCÍA	Born in 1955, he holds a degree in Industrial Engineering from Universidad Politécnica de Madrid. He is a member of Bankia's Board of Directors, Chairman of the Audit and Compliance Committee and a member of the Appointments and Responsible Management Committee and the Technology and Innovation Committee. He is chairman of Asociación Española del Gran Consumo (AECOC), director of Meliá Hotels International and chairman of its Audit and Compliance Committee. He is also a member of the Advisory Board of Kearney (senior advisor) and of the Advisory Board of the Palacios Alimentación Group and IPA Capital S.L. (Pastas Gallo). He is a director of the Asociación para el Progreso de la Dirección (APD) and trustee of the Fundación Bankia por la Formación Dual, the Fundación F. Campo and the Fundación Iter. He began his professional career at Arthur Andersen and served as worldwide Chairman of the Día Group, as a member of the Worldwide Executive Committee of the Carrefour Group and Chairman of the Zena and Cortefiel Groups.
MRS. EVA CASTILLO SANZ	Born in 1962, she holds a degree in Law and Business Studies from Universidad Pontificia de Comillas (E-3) in Madrid. She is a member of Bankia's Board of Directors, chairwoman of the Appointments and Responsible Management Committee, member of its Board Risk Committee and its Technology and Innovation Committee and Independent Coordinating Director. She is an independent director of Zardoya Otis and International Consolidated Airlines Group (IAG), a member of the Council for the Economy of the Holy See, and a member of the Boards of Trustees of Fundación Comillas-ICAI, and Fundación Entreculturas. She has been a director of Telefónica, S.A., and chairwoman of the Supervisory Board of Telefónica Deutschland. Previously, Ms. Castillo worked at Merrill Lynch, where she became chairwoman of its Spanish subsidiary.
MR. JORGE COSMEN MENÉNDEZ-CASTAÑEDO	Born in 1968, he holds a degree in Business Administration and an MBA from Instituto de Empresa. He is a member of the Board of Directors of Bankia and of its Remuneration Committee. Chairman of ALSA and vice-Chairman of National Express Group, PLC, he is also a member of the Fundación Consejo España-China and of Fundación Integra. Previously, he worked in companies in the tourism, banking and international trade sectors in Spain, Switzerland, Hong Kong and China.

<p>MR. JOSÉ LUIS FEITO HIGUERUELA</p>	<p>Born in 1952, he holds a degree in Economics and Business Studies from Universidad Complutense de Madrid. He has been a member of the Board of Directors of Bankia and of its Audit and Compliance Committee since June 2012. Qualified as a State Trade Expert and Economist and former ambassador of the Kingdom of Spain, at present he is member of the Economic and Financial Policy Commission of the CEOE and trustee of the Fundación Carlos III. He has been Chairman and general manager of the Institute for Economic Studies (IEE) and an independent director of Red Eléctrica Corporación. Previously, he worked in the Spanish Ministry of the Economy, the International Monetary Fund, the OECD, the Banco de España and AB Asesores Bursátiles.</p>
<p>MR. FERNANDO FERNÁNDEZ MÉNDEZ DE ANDÉS</p>	<p>Born in 1956, he holds a doctorate in Economics. He is a member of the Board of Directors of Bankia and of its Board Risk Committee, Risk Advisory Committee and Audit and Compliance Committee. He has been a member of the Board of Directors of BFA, Tenedora de Acciones, S.A.U. He is a lecturer in economics at the IE Business School specialized in Macroeconomics, International Economics and Financial Stability. He has served as Chief Economist of the International Monetary Fund and as Chief economist and head of the Research Service at Banco Central Hispano and Banco Santander and Director of Red Eléctrica.</p>
<p>MRS LAURA GONZALEZ MOLERO</p>	<p>Born in 1965, she holds a degree in Pharmacy, specializing in Industrial Pharmacy, from the Complutense University in Madrid, an Executive MBA from the IE Business School, a higher course from Fontainebleau and a higher course in innovation from IMD Lousanne. She is a member of Bankia's Board of Directors, the Appointments and Responsible Management Committee, the Remuneration Committee and the Board Risk Committee. She has spent her career in major international corporations in the health and chemical sectors; she was Chairwoman of Bayer HealthCare Latin America, Chairwoman of Merck Serono Latin America, Chief Executive Officer of Merck Group Spain, and Vice-Chairwoman of Serono Iberia & Scandinavia. She is currently an independent director of Acerinox, Grupo Ezentis and Viscofan. She is also chairwoman of the Asociación para el Progreso de la Dirección (APD) and a member of the Advisory Board of ISS Facility Management in Spain.</p>
<p>MR ANTONIO GREÑO HIDALGO.</p>	<p>Born in 1956, he holds a degree in Business Science and is a Certified Public Accountant. He is a member of the Board of Directors of Bankia, Chairman of the Remuneration Committee and member of its Audit and Compliance Committee and Risk Advisory Committee. Previously, he was a member of the Board of Directors of BFA, Tenedora de Acciones, S.A.U.</p> <p>He has made his career at PricewaterhouseCoopers (PwC), where in 1995 he was appointed International Partner and from 2003 to 2010 was the partner responsible for the financial sector at PwC in Spain and he was a member of the PwC EMEA (Europe, Middle East and Africa) Financial Sector Management Committee. He is also an independent director at Liberty Seguros. He has served as a director representing the Deposit Guarantee Fund in Catalunya Bank.</p>

MRS. NURIA OLIVER RAMIREZ	Born in 1970, she holds a higher degree in Telecommunications Engineering from the Universidad Politécnica de Madrid and a Doctorate with honours in Media Arts and Sciences from the Massachusetts Institute of Technology (Massachusetts - United States). She is a member of the Board of Directors of Bankia and of its Technology and Innovation Committee. She has pursued her professional career in internationally recognised companies as researcher, innovator and director of research in artificial intelligence, intelligent and interactive systems, mobile IT and big data. She has been a researcher at Microsoft Research, scientific director at Telefónica I+D and global director of data science research at Vodafone. She is chief data scientist at Data-Pop Alliance and advisor to universities, thinktanks, governments and institutions such as the European Commission and the World Economic Forum. She is co-founder and vice-chairwoman of the European Laboratory of Learning and Intelligent Systems (ELLIS), a European network that seeks to foster scientific excellence in Artificial Intelligence. She has an honorary doctorate from the Universidad Miguel Hernández de Elche and academic member of the Royal Academy of Engineering. She is also the Commissioner of the Office of the President of the Region of Valencia for Artificial Intelligence and, specifically to coordinate data intelligence in the face of the COVID-19 epidemic.
Total number of independent directors	9
Percentage of Board	69.23

Indicate whether any director classified as independent receives from the company or any company in its group any amount or benefit other than remuneration as a director, or has or has had a business relationship with the company or any company in its group during the past year, whether in his or her own name or as a significant shareholder, director or senior executive of a company that has or has had such a relationship.

If so, include a reasoned statement by the Board explaining why it believes that the director in question can perform his or her duties as an independent director.

Name or company name of director	Description of the relationship	Reasoned statement
MR. JOAQUÍN AYUSO GARCÍA	Finance lease agreements between Bankia and the Real Sociedad Hípica Española Club de Campo.	Based on the report of the Appointments and Responsible Management Committee, the Board of Directors of Bankia, S.A. considers that Joaquín Ayuso García, a member of the management board of the Real Sociedad Hípica Española Club de Campo, can continue to be classified as an independent director of Bankia, S.A. and the Real Sociedad Hípica Española Club de Campo given (i) the ordinary nature of the relations, with business conducted under general market terms; (ii) Bankia, S.A.'s generally rigorous procedures for engaging works and services, which were applied in this case; (iii) the non-intervention by this director in the negotiations and decision-making processes of either party; and (iv) the express intervention of the Board of Directors and the Audit and Compliance Committee given the related-party nature of the relationship.
MR. FRANCISCO JAVIER CAMPO GARCÍA	Financing agreements between Bankia and the Meliá Hotels International Group, the Palacios Alimentación Business Group, IPA Capital, S.L. and guarantee agreement between Bankia and AECOC.	Based on the report of the Appointments and Responsible Management Committee, the Board of Directors of Bankia, S.A. considers that Mr. Francisco Javier Campo García, member of the Board of Directors of Meliá Hotels International, minority shareholder and Senior Advisor of the Palacios Alimentación Group, minority shareholder and Senior Advisor of IPA Capital, S.L. and chairman of AECOC representing Bankia, can continue to be classified as an independent director of Bankia, S.A., Meliá Hotels International, the Palacios Alimentación Group, IPA Capital, S.L. and AECOC, and or the companies of their groups, given (i) the ordinary nature of the relations, with business conducted under general market terms; (ii) Bankia, S.A.'s generally rigorous procedures for engaging works and services, which were applied in this case; (iii) the non-intervention by this director in the negotiations and decision-making processes of either party; and (iv) the express intervention of the Board of Directors and the Audit and Compliance Committee

		given the related-party nature of the relationship.
MRS. EVA CASTILLO SANZ	Financing and services agreements between Bankia and Zardoya Otis and financing and service agreements between Bankia and the IAG Group.	Based on the report by the Appointments and Responsible Management Committee, the Board of Directors of Bankia, S.A. considers that Ms. Eva Castillo Sanz, a member of the board of directors of Zardoya Otis, S.A. and that of International Consolidated Airlines Group, S.A. (IAG) (since 31 December 2020) can continue to be classified as an independent director of Bankia, S.A. despite the commercial relations between Bankia and Zardoya Otis, S.A., and its group companies and between Bankia and IAG and its group companies, given i) that they entail agreements and/or transactions arranged before she joined the board of Zardoya Otis, whose terms and conditions have not been modified since; (ii) the ordinary nature of the relations, with business conducted under general market terms; (iii) Bankia, S.A.'s generally rigorous procedures for engaging works and services, which were applied in this case; and (iv) the non-intervention by this director in the negotiations and decision-making processes of either party.
MR. JORGE COSMEN MENÉNDEZ- CASTAÑEDO	Service agreements between Bankia and the Alsa Group (National Express Group).	Based on the report of the Appointments and Responsible Management Committee, the Board of Directors of Bankia, S.A. considers that Mr. Mr. Jorge Cosmen Menéndez-Castañedo, a member of the Board of

		<p>Directors of the National Express Group PLC, can continue to be classified as an independent director of Bankia, S.A. despite the commercial relations between Bankia, S.A. and the ALSA Group (National Express Group), given (i) the ordinary nature of the relations, with business conducted under general market terms; (ii) Bankia, S.A.'s generally rigorous procedures for engaging works and services, which were applied in this case; (iii) the non-intervention by this director in the negotiations and decision-making processes of either party; and (iv) the express intervention of the Board of Directors and the Audit and Compliance Committee given the related-party nature of the relationship.</p>
<p>MRS LAURA GONZALEZ MOLERO</p>	<p>Financing agreements between Bankia and the Acerinox Group, between Bankia and the Ezentis Group, and between Bankia and the Viscofan Group and service agreements between Bankia and the Integrated Service Solutions Group (ISS).</p>	<p>The Board of Directors of Bankia, S.A., based on a report by the Appointments and Responsible Management Committee, considers that Laura González Molero, member of the boards of directors of Acerinox, S.A., Ezentis, S.A. and Viscofan, S.A. and of the advisory board of Integrated Service Solutions, S.L. (ISS), may continue to be classified as an independent director of Bankia, S.A. despite the commercial relations with Bankia, S.A. and Acerinox, Ezentis, Viscofan and the ISS Group, given (i) the ordinary nature of the relations, with business conducted under general market terms; (ii) Bankia, S.A.'s generally rigorous procedures for engaging works and services, which were applied in this case; and (iii) the non-intervention by this director in the negotiations and decision making processes of either party and, (iv) the express intervention of the Board of Directors and Audit and Compliance Committee given the related-party nature of the relationship.</p>

OTHER EXTERNAL DIRECTORS			
Identify the other external directors, indicate the reasons why they cannot be considered either proprietary or independent, and detail their ties with the company or its management or shareholders:			
Name or company name of Director	Reasons	Company, manager or shareholder to which or to whom the director is related	Profile
MR. CARLOS EGEEA KRAUEL	<p>On 26 March 2019, Mr. Egea tendered his resignation from his executive duties on the Bankia Board of Directors, while remaining a director.</p> <p>Mr. Egea explained that his resignation from his executive duties was prompted by the completion of the integration of Banco Mare Nostrum, S.A. with Bankia, S.A., and by strictly personal reasons.</p> <p>The effects of Mr. Egea's resignation from his executive duties were in accordance with the terms of the contract for services between Bankia and Mr. Egea.</p> <p>As a result of this resignation from executive duties, on 26 June 2019, in accordance with Article 529 duodecies of the Corporate Enterprises Act, the Board of Directors, based on a report by the Appointments and Responsible Management Committee in favour of the measure, resolved to assign Mr. Egea to the category of "other external director", with effect from 28 June 2019.</p>	BANKIA, S.A.	<p>Born in 1947, he has an Industrial Engineering degree from Escuela Técnica Superior de Ingenieros Industriales de Madrid and a PhD in Economics and Business from Universidad Autónoma de Madrid.</p> <p>He is a member of the Board of Directors of Bankia and its Audit and Compliance Committee.</p> <p>He was vice-president of Ahorro Corporación, S.A. Member of the boards of directors of CASER, Enagás, S.A. and Iberdrola Renovables, S.A. and Secretary of the board of directors of the Spanish Confederation of Savings Banks (Confederación Española de Cajas de Ahorros, CECA).</p> <p>He started his career in the industrial sector, with the company Fraymon. From there, he joined the financial sector through Banco Atlántico.</p> <p>In 1976, he joined Caja de Ahorros de Murcia, where he was appointed General Manager in 1983 and President in 2008. Since June 2008, he has been President of Fundación Caja Murcia, of which he had previously (since its creation in 2001) been Vice-President.</p> <p>He was the chairman of the board of directors of Banco Mare Nostrum, S.A.</p>

			from 2010 and until the merger with Bankia.
Total number of other external directors	1		
Percentage of Board	7.69		

Indicate any changes that have occurred during the period in each director's category:

Name or company name of director	Date of change	Previous category	Current category
No data			

C.1.4 Complete the following table with information relating to the number of female directors at the close of the past four years, as well as the category of each:

	Number of female directors				% of total directors for each category			
	Year 2020	Year 2019	Year 2018	Year 2017	Year 2020	Year 2019	Year 2018	Year 2017
Executive					0.00	0.00	0.00	0.00
Proprietary					0.00	0.00	0.00	0.00
Independent	3	2	2	1	33.33	25.00	25.00	14.29
Other External					0.00	0.00	0.00	0.00
Total	3	2	2	1	23.08	16.67	16.67	10.00

C.1.5 Indicate whether the company has diversity policies in relation to its Board of Directors on such questions as age, gender, disability, education and professional experience. Small and medium-sized enterprises, in accordance with the definition set out in the Spanish Auditing Act, will have to report at least the policy that they have implemented in relation to gender diversity.

☒ Yes

☐ No

☐ Partial policies

If so, describe these diversity policies, their objectives, the measures and the way in which they have been applied and their results over the year. Also indicate the specific measures adopted by the Board of Directors and the nomination and remuneration committee to achieve a balanced and diverse presence of directors.

If the company does not apply a diversity policy, explain the reasons why.

Description of policies, objectives, measures and how they have been applied, and results achieved

In 2018, Bankia's Board of Directors approved the Selection, Diversity, Suitability, Integration and Training Policy for Directors, which brings together and completes the various policies in place at the Bank until then.

In 2020, the Board reviewed and updated the Policy.

With this policy, Bankia ensures that the members of its Board of Directors are suitable and together have the right knowledge, skills and experience necessary to carry out their duties. It also promotes diversity in terms of nationality, gender, knowledge and experience to enrich decisions and provide a broad range of viewpoints. Moreover, it seeks a diversity of profiles in the Board of Directors.

Therefore, the Board of Directors and the Appointments and Responsible Management Committee have set an objective of ensuring that the following areas of diversity are upheld at all times:

- a) Academic and professional profile.
- b) Gender.
- c) Age.
- d) Geographical origin.
- e) Non-discrimination.

In addition, to achieve the gender diversity target Bankia has established (i.e. having at least 30% of total board places occupied by women directors by the year 2020) the Board of Directors and the Appointments and Responsible Management Committee shall ensure, when new vacancies arise, that the selection procedures do not involve hidden biases that could result in any discrimination whatsoever and, in particular, that they facilitate the selection of sufficient female directors to ensure an equal number of men and women on the Board. In this respect, it shall not establish any requirements and/or apply any criteria that in any way could result in any type of discrimination.

Bankia operates a policy on replacements on the Board based on balancing the principles of representativeness, diversity and independence in the light of domestic and international good governance recommendations, ensuring stability in the composition of the Board of Directors and its Committees, and complying with the duration of directors' mandates in accordance with appointments, re-elections and ratifications.

C.1.6 Describe the measures, if any, agreed upon by the nomination committee to ensure that selection procedures do not contain hidden biases which impede the selection of female directors and that the company deliberately seeks and includes women who meet the target professional profile among potential candidates, making it possible to achieve a balance between men and women. Also indicate whether these measures include encouraging the company to have a significant number of female senior executives:

Explanation of measures

Article 15 of the Board of Directors Regulations of Bankia stipulates that the Appointments and Responsible Management Committee is responsible for setting a representation objective for the least-represented gender on the Board of Directors and developing guidance on how to increase the number of the least-represented gender to achieve this objective.

In this respect, the Board of Directors, on a proposal by the Appointments and Responsible Management Committee, has approved the Suitability Policy for Directors, General Managers or Similar, and other key position holders at Bankia and the Director Selection, Diversity, Integration and Training Policy to ensure that the Bankia director selection procedure favours a diversity of gender, experience and knowledge, facilitating the selection of female directors and, in general, does not involve hidden biases that could imply any discrimination, seeking a diversity of profiles on the Board of Directors.

Likewise, with a view to increasing the presence of female directors, in 2020 the General Meeting of Shareholders resolved to appoint and incorporate a new independent director to the Board of Directors.

If in spite of any measures adopted there are few or no female directors or senior managers, explain the reasons for this:

Explanation of reasons

The progressive increase in gender diversity over recent years is noteworthy.

In 2018, the number of female directors on the Board of Directors of Bankia increased with the incorporation of Mrs. Laura Gonzalez Molero.

Additionally, as noted above, the number of female directors increased again in 2020 with the incorporation of Ms. Nuria Oliver Ramirez to the Board of Directors as an independent director.

At year-end 2020, the Board of Directors of Bankia was composed of three executive directors, one "other external director", and nine independent directors, of which three were women, one of whom was an Independent Coordinating Director.

This means that 23.1% of the board seats were occupied by women, representing a 6.4% increase on the previous year.

Women also account for 33.3% of the independent directors, with one of the six board committees chaired by a woman and female directors present on five board committees in total.

Accordingly, as regards the presence of women in the Board of Directors' delegate bodies, they currently account for 50% of the Appointments and Responsible Management Committee, which is also chaired by a woman, 25% of the Remuneration Committee, 25% of the Risk Advisory Committee, and 33 % of the Board Risk Committee and 40% of the Technology and Innovation Committee.

C.1.7 Explain the conclusions of the nomination committee regarding verification of compliance with the policy aimed at promoting an appropriate composition of the Board of Directors.

Pursuant to the Board of Directors Regulations, the Appointments and Responsible Management Committee is the body responsible for periodically reviewing the policy, submitting to the Board of Directors its findings or making the proposals for amendments or improvements it deems appropriate.

The Appointments and Responsible Management Committee is also responsible for running an annual check, based on the report submitted to it by the People, Resources and Technology Department, on compliance with the Policy.

As a result, in 2018, the Board of Directors approved an amendment to Bankia, S.A.'s Director Selection Policy which, at the request of the Appointments and Responsible Management Committee, was reviewed in 2020. At the meeting held on 24 April 2020, the Board approved the Suitability Policy for Directors, General Managers and Similar, and other key position holders at Bankia and the Director Selection, Diversity, Suitability, Integration and Training Policy, to guarantee that the bodies overseeing the director selection process at Bankia seek to ensure that the selection procedure favours a diversity of gender, experience and knowledge, facilitating the selection of female directors and promoting a diversity of profiles.

This ensures a diverse composition with directors of varying professional and personal profiles (e.g. age, gender, nationality) that enriches and brings different viewpoints to the debates and decision-making of the governing bodies.

Bankia has maintained the diversity objective pursued by the previous selection policy of having at least 30% of total board places occupied by women directors before the year 2020.

C.1.8 If applicable, explain the reasons for the appointment of any proprietary directors at the request of shareholders with less than a 3% equity interest:

Name or company name of shareholder	Reason
No data	

Indicate whether the Board has declined any formal requests for presence on the Board from shareholders whose equity interest is equal to or greater than that of others at whose

request proprietary directors have been appointed. If so, explain why the requests were not granted:

[] Yes
[✓] No

C.1.9 Indicate the powers, if any, delegated by the Board of Directors to directors or Board committees:

Name or company name of director or committee	Brief description
MR. JOSÉ IGNACIO GOIRIGOLZARRI TELLAECHÉ	The Chairman of the Board of Directors has broad powers of representation and administration in accordance with the characteristics and requirements of the position of executive Chairman of the Company, with all powers vested in him except for those that cannot be delegated by law or per the Bylaws.
MR. JOSÉ SEVILLA ÁLVAREZ	Mr. Sevilla has been delegated, jointly and severally, all powers delegable to him by law or per the Bylaws in the areas of financial and risk management, financial control and internal audit, those related to real estate and investees, and legal, tax and regulatory compliance advice. The Company also granted Mr. Sevilla general powers of attorney, subject in any event, to the Bankia Group's Catalogue of General Powers, which shall be exercised in accordance with the system in place for each class of legal representative approved by the Board of Directors
MR. ANTONIO ORTEGA PARRA	The Company also granted Mr. Ortega general powers of attorney, subject in any event to the Bankia Group's Catalogue of General Powers, which shall be exercised in accordance with the system in place for each class of legal representative approved by the Board of Directors.
BOARD RISK COMMITTEE	The Board Risk Committee is an executive body and may therefore adopt the corresponding decisions within the scope of the powers delegated to it by the Board of Directors. The Board Risk Committee has the following delegated powers: - To make decisions within the scope of the powers delegated to it by the Board of Directors in risk matters specifically provided for in the Board's delegation resolution in force from time to time. - Within the scope of its authority, to set the overall pre-classification limits for account holders or customer groups in relation to exposures by risk class. - To report to the Board of Directors on risks that may affect the Company's capital adequacy, recurring results, operations or reputation. - With respect to the approval of risk types other than credit risk, the powers of the Board Risk Committee will be those delegated to it by the Board of Directors at any given time. - Pursuant to the resolution for the delegation of powers to the Board Risk Committee adopted on 29 June 2012, the Board Risk Committee has powers to decide on credit risk proposals falling within its remit and delegated powers. Such powers are currently limited to between EUR 300 million, for transactions

	with the lowest rating level, and EUR 1,300 million for those with the highest, above which amount approval by the Board of Directors is required in all cases. There is a specific rule for specific groups with reputational risk, with respect to which the maximum amount authorised is EUR 10 million.
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C.1.10 Identify any members of the Board who are also directors, representatives of directors or managers in other companies forming part of the listed company's group:

Name or company name of director	Company name of the group entity	Position	Does the director have executive powers?
No data			

C.1.11 List any directors or representatives of legal-person directors of your company who are members of the Board of Directors or representatives of legal-person directors of other companies listed on regulated markets other than group companies of which the company has been informed:

Name or company name of director	Company name of the listed entity	Position
MR. FRANCISCO JAVIER CAMPO GARCÍA	MELIÁ HOTELS INTERNATIONAL, S.A.	DIRECTOR
MRS. EVA CASTILLO SANZ	ZARDOYA OTIS, S.A.	DIRECTOR
MRS. EVA CASTILLO SANZ	INTERNATIONAL CONSOLIDATED AIRLINES GROUP, S.A. (IAG)	DIRECTOR
MR. JORGE COSMEN MENÉNDEZ-CASTAÑEDO	NATIONAL EXPRESS GROUP, PLC.	VICE-CHAIRMAN
MRS. LAURA GONZÁLEZ MOLERO	GRUPO EZENTIS, S.A.	DIRECTOR
MRS. LAURA GONZÁLEZ MOLERO	ACERINOX, S.A.	DIRECTOR
MRS. LAURA GONZÁLEZ MOLERO	VISCOFAN, S.A.	DIRECTOR

Bankia, S.A., as a credit institution, is subject to the restrictions contained in Law 10/2014, of 26 June, on the regulation, supervision and solvency of credit institutions, which sets out the rules for incompatibilities and restrictions to which members of the Board of Directors and general managers or similar of a credit institution are subject, and which regulates the number of Boards on which the directors of credit institutions may sit at the same time.

In this respect, article 8 of the Board of Directors Regulations states that the number of Boards on which directors may sit at the same time shall not exceed that set out in banking and company laws applicable at any given time.

It should also be noted that Ms Eva Castillo Sanz was appointed independent director of International Consolidated Airlines Group, S.A. (IAG) on 31 December 2020.

C.1.12 Indicate whether the company has established rules on the maximum number of company boards on which its directors may sit, explaining if necessary and identifying where this is regulated, if applicable:

[☒] Yes
[☐] No

Explanation of the rules and identification of the document where this is regulated

Bankia, S.A., as a credit institution, is subject to the restrictions contained in Law 10/2014, of 26 June, on the regulation, supervision and solvency of credit institutions, which sets out the rules for incompatibilities and restrictions to which members of the Board of Directors and general managers or similar of a credit institution are subject, and which regulates the number of Boards on which the directors of credit institutions may sit at the same time.

In this respect, article 8 of the Board of Directors Regulations states that the number of Boards on which directors may sit at the same time shall not exceed that set out in banking and company laws applicable at any given time.

C.1.13 Indicate the remuneration received by the Board of Directors as a whole for the following items:

Remuneration accruing in favour of the Board of Directors in the financial year (thousands of euros)	2.472
Amount of pension rights accumulated by directors currently in office (thousands of euros)	
Amount of pension rights accumulated by former directors (thousands of euros)	1.541

In relation to the caption "Remuneration accruing in favour of the Board of Directors in the financial year":

It includes the remuneration of both executive and non-executive directors.

Ms. Oliver Ramírez was appointed as a Board member with effect as of 3 April 2020, with total remuneration of EUR 100,000 per year. The amounts shown correspond to the period running from that date to 31 December 2020.

Mr. Goirigolzarri, Mr. Sevilla and Mr. Ortega have waived any variable remuneration in 2020.

In relation to the caption "Amount of pension rights accumulated by former directors":

Total amount related to accumulated and updated pension interests as at 31 December 2019 of Rodrigo de Rato Figaredo, Francisco Verdú Pons, José Luis Olivas Martínez and José Manuel Fernández Norniella. The latest contribution by Bankia was in 2012.

C.1.14 Identify members of senior management who are not also executive directors and indicate their total remuneration accrued during the year:

Name or company name	Position(s)
MR. GONZALO ALCUBILLA POVEDANO	DEPUTY GENERAL MANAGER OF BUSINESS BANKING
MR. LEOPOLDO ALVEAR TRENOR	DEPUTY GENERAL DIRECTOR OF FINANCIAL MANAGEMENT
MRS. AMALIA BLANCO LUCAS	DEPUTY GENERAL MANAGER OF COMMUNICATION AND EXTERNAL RELATIONS
MR. MIGUEL CRESPO RODRÍGUEZ	DEPUTY GENERAL MANAGER OF THE GENERAL SECRETARIAT
MR. MANUEL GALARZA PONT	DEPUTY GENERAL DIRECTOR OF CREDIT RISKS
MR. DAVID LÓPEZ PUIG	DEPUTY GENERAL DIRECTOR OF PEOPLE AND CULTURE

MR. FERNANDO SOBRINI ABURTO	DEPUTY GENERAL DIRECTOR OF ASSET MANAGEMENT AND INVESTEES		
MR. EUGENIO SOLLA TOMÉ	DEPUTY GENERAL DIRECTOR OF RETAIL BANKING		
MR. CARLOS TORRES GARCÍA	DEPUTY GENERAL DIRECTOR OF TRANSFORMATION AND DIGITAL STRATEGY		
MR. IÑAKI AZAOLA ONAINDIA	CORPORATE DIRECTOR OF INTERNAL AUDIT		
Number of women in senior management			1
Percentage of total senior management			10.00

Total remuneration of senior management (thousands of euros)	
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In relation to the caption "total remuneration of senior management":

The amount of variable remuneration granted in 2020 is pending the pertinent authorisations and approvals envisaged in current legislation.

- Clarification regarding "senior managers":

Mr. Iñaki Azaola Onaíndia, Corporate Director of Internal Audit, is included in this group following the instructions to fill in this document.

C.1.15 Indicate whether the Board regulations were amended during the year:

[☒] Yes
[☐] No

Description of amendment(s)

On 27 May 2020, based on a favourable report by the Audit and Compliance Committee, the Board of Directors resolved to include in the Board of Directors Regulations an article 14 bis, to regulate the Technology and Innovation Committee, with a view to regulating its functioning, composition and rules of operation. On the same date, the Board of Directors resolved to appoint the members of that Committee.

Likewise, on 23 December 2020, based on a favourable report by the Audit and Compliance Committee, the Board of Directors resolved to amend the Board of Directors Regulations in order to bring them into line with the provisions of the Code of Good Governance Code for Listed Companies reviewed by the CNMV in June 2020. The Audit and Compliance Committee Regulations were also amended on that date, and for the same purpose.

C.1.16 Specify the procedures for selection, appointment, re-election and removal of directors. List the competent bodies, steps to follow and criteria applied in each procedure.

Directors shall be appointed, re-elected and ratified by the General Meeting of Shareholders or by the Board of Directors in conformity with the provisions set forth in prevailing legislation and in articles 37 to 40 of the Company's Bylaws, article 21 of the Board of Directors Regulations, articles 12 and 13 of the Appointments and Responsible Management Committee Regulations and applying Bankia's Policy on the Suitability of Directors, General Managers and Other Key Function Holders and Policy on the Selection, Diversity, Suitability, Integration and Training of Directors.

In particular, the Board of Directors may appoint directors by the co-optation system to cover vacancies arising during the term of office of the directors. Directors appointed by co-optation shall provisionally hold the post until the date of the first General Meeting of Shareholders after being appointed by co-optation, inclusive, which may resolve to ratify their appointment, whereby the appointment as director shall become permanent. In any event, from the date of appointment, directors appointed by co-optation shall have the same rights and obligations as directors appointed directly by the General Meeting of Shareholders.

Directors appointed by co-optation shall immediately stand down if their appointment is not ratified in the first General Meeting of Shareholders after they are appointed. Moreover, should any vacancies arise once a General Meeting is called but

before it is held, the Board of Directors may appoint a director to fill the vacancy until the new General Meeting of Shareholders.

Any proposals for the appointment, re-election and ratification of directors which the Board of Directors submits to the General Meeting of Shareholders and any appointment decisions made by the Board itself under its powers of co-optation are the responsibility of the Appointments and Responsible Management Committee, in the case of independent directors, or the Board itself, in the case of all other directors, subject to a report by the Appointments and Responsible Management Committee, and must in turn be accompanied by the relevant Board report assessing the competence, experience and merits of the proposed candidate, which will be attached to the General Meeting or Board meeting minutes.

In selecting proposed directors, care will be taken to select persons of recognised business and professional good standing, competence, reputation and experience in the financial sector who are equipped to exercise good governance of the Company, in accordance with applicable laws and regulations in the matter.

The persons appointed as directors must satisfy the conditions imposed by Law or the Bylaws, at the time of taking office formally covenanting to fulfil the obligations and duties contemplated therein and in the Board of Directors Regulations. Specifically, candidates proposed for appointment, re-election or ratification as directors of Bankia must meet the suitability requirements set forth in the Policy on the Suitability of Directors, General Managers and Other Key Function Holders at Bankia.

Any legal person who is appointed a director must appoint a single natural person to perform the director's functions on a permanent basis. Any revocation of such an appointment by the legal person director will have no effect until a replacement is appointed. In addition, the appointment of a natural person to act as representative will be subject to a report by the Appointments and Responsible Management Committee.

The natural person who is permanently appointed to perform the functions of a legal person director must meet the same suitability requirements, shall be subject to the same rules of incompatibility, have the same duties and be jointly and severally liable with the legal person director.

There is no age limit for appointment to or serving in this position.

According to article 23 of the Board of Directors Regulations, directors will cease to serve as such when the term for which they were appointed elapses, when so decided by the General Meeting or when they are to resign.

Where, due to resignation or resolution of the General Meeting of Shareholders, a director stands down before the end of his or her term of office, the director must offer a sufficient explanation of the reasons for his or her decision, or in the case of non-executive directors, their opinion of the reasons for their removal by the General Meeting, in a letter addressed to all members of the Board of Directors. The reasons for the decision shall be explained in the annual corporate governance report. Likewise, insofar as it is relevant to investors, the company must make public the director's removal as soon as possible, adequately referring to the reasons or circumstances adduced by the director.

(CONTINUED IN SECTION H)

C.1.17 Explain to what extent the annual evaluation of the Board has given rise to significant changes in its internal organisation and in the procedures applicable to its activities:

Description of amendment(s)

It has not given rise to any relevant changes.

Describe the evaluation process and the areas evaluated by the Board of Directors with or without the help of an external advisor, regarding the functioning and composition of the Board and its committees and any other area or aspect that has been evaluated.

Description of the evaluation process and areas evaluated

In 2020 the entity carried out an internal assessment which essentially consisted of the surveying of Board Members, in order to assess the Chairman, the Chief Executive Officer, the Coordinating Director, the operation of the Board of Directors, and each Board member. The internal assessment is connected to and completes the previous external assessment (the external assessment is mandatory every three years under the Bankia Bylaws) and provides a means of evaluating the Board of Directors and its most relevant offices and has mainly focussed on the following:

Chairman, Chief Executive Officer and General Secretary

-Activities and performance of the Chairman in 2020.

Assessment of the chairs of the Board Committees:

-Structure, composition, education, operation and competencies of the board committees; - Activities and objectives in 2020.

Assessment of the Lead Independent Director. - Activities and performance in 2020.

Operation of the Board of Directors and individual assessment of each board member:

-Assessment of the operation of the Board: overall assessment (structure, composition, education and competencies of the Board of Directors)

-Individual assessment of each director: performance and contribution of each one.

The findings were presented to the Appointments and Responsible Management Committee and the Board of Directors.

C.1.18 Provide details, for years in which the evaluation was carried out with the help of an external advisor, of the business relationships that the external advisor or company in its group maintains with the company or any company in its group.

The internal evaluation was performed without the assistance of an external advisor.

C.1.19 Indicate the cases in which directors are obliged to resign.

According to article 23 of the Board of Directors Regulations, directors will cease to serve as such when the term for which they were appointed elapses, when so decided by the General Meeting or when they are to resign.

Without prejudice to the above, directors must place their offices at the Board of Directors' disposal and, if the Board deems it appropriate, tender their resignation in the following cases:

- a) When they are affected by any of the scenarios of incompatibility or prohibition or unsuitability prescribed by law.
- b) When they are tried for or accused of alleged criminal offenses or subject to disciplinary proceedings for serious or very serious infractions brought by the supervisory authorities.

For these purposes, directors of the Company must inform the Board of Directors of the existence of any circumstances - related to their activities at the Company or otherwise - that could be detrimental to the standing and reputation of the Company, and, in particular, of any criminal actions in which they are the party under investigation, as well as subsequent procedural developments.

Where the Board is informed or becomes aware in any other manner of any of the circumstances mentioned above, it must investigate the case as quickly as possible and, having regard to the specific circumstances, decide, based on a report from the Appointments and Remuneration Committee, whether or not any measures must be adopted, such as the opening of an internal investigation, asking the director to resign or proposing that he or she be removed by the General Meeting. These events must be reported in the annual corporate governance report, unless there are any special reasons not to do so, which must also be placed on record in the minutes. This without prejudice to the information that the company must disseminate, if appropriate, upon implementation of the corresponding measures.

C.1.20 Are qualified majorities other than those established by law required for any particular kind of decision?

[] Yes
[✓] No

If so, describe the differences.

C.1.21 Explain whether there are any specific requirements, other than those relating to directors, for being appointed as chairman of the Board of Directors.

[] Yes
[✓] No

C.1.22 Indicate whether the articles of incorporation or Board regulations establish any limit as to the age of directors:

[] Yes
[☒] No

C.1.23 Indicate whether the articles of incorporation or Board regulations establish any term limits for independent directors other than those required by law or any other additional requirements that are stricter than those provided by law:

[] Yes
[☒] No

C.1.24 Indicate whether the articles of incorporation or Board regulations establish specific rules for appointing other directors as proxy to vote in Board meetings, if so the procedure for doing so and, in particular, the maximum number of proxies that a director may hold, as well as whether any limit has been established regarding the categories of director to whom votes may be delegated beyond the limits imposed by law. If so, briefly describe these rules.

According to article 18.1 of the Board of Directors Regulations, the directors will do everything possible to attend meetings of the Board. When they cannot do so in person, they will arrange to grant voting proxies to another member of the Board. Proxies will be granted on a special basis for the meeting of the Board of Directors in question, when possible with instructions. Notice thereof may be given in any of the ways contemplated in section 2 of article 17 of the Board of Directors Regulations, although non-executive directors may only grant proxies to another director in accordance with applicable legislation.

Similarly, article 30.4.b) of the Board of Directors Regulations states that directors are required to attend the meetings of the bodies of which they are members and actively participate in the deliberations so that their judgment effectively contributes to decision-making. If, for a justified reason, a director is unable to attend meetings to which he has been called, he to the extent possible must instruct the director who will represent him.

According to article 17.6 of the Board of Directors Regulations, the agendas of Board meetings shall clearly indicate the items on which directors must arrive at a decision or resolution, so they can study the matter beforehand or gather together the material they need to make a decision.

C.1.25 Indicate the number of meetings held by the Board of Directors during the year. Also indicate, if applicable, the number of times the Board met without the chairman being present. Meetings where the chairman gave specific proxy instructions are to be counted as attended.

Number of board meetings	21
Number of board meetings held without the chairman's presence	0

Indicate the number of meetings held by the coordinating director with the other directors, where there was neither attendance nor representation of any executive director:

Number of meetings	0
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Indicate the number of meetings held by each Board committee during the year:

Number of meetings held by the RISK ADVISORY COMMITTEE	19
Number of meetings held by the APPOINTMENTS AND RESPONSIBLE MANAGEMENT COMMITTEE	13
Number of meeting held by the REMUNERATION COMMITTEE	10
Number of meetings held by the TECHNOLOGY AND INNOVATION COMMITTEE	2
Number of meetings held by the BOARD RISK COMMITTEE	27
Number of meetings held by the AUDIT AND COMPLIANCE COMMITTEE	20

C.1.26 Indicate the number of meetings held by the Board of Directors during the year with member attendance data:

Number of meetings in which at least 80% of directors were present in person	21
Attendance in person as a % of total votes during the year	98.86
Number of meetings with attendance in person or proxies given with specific instructions, by all directors	21
Votes cast in person and by proxies with specific instructions, as a % of total votes during the year	100.00

C.1.27 Indicate whether the individual and consolidated financial statements submitted to the Board for issue are certified in advance:

[☒] Yes

[☐] No

Identify, if applicable, the person(s) who certified the individual and consolidated financial statements of the company for issue by the Board:

Name	Position
MR. LEOPOLDO ALVEAR TRENOR	DEPUTY GENERAL DIRECTOR OF FINANCIAL MANAGEMENT

C.1.28 Explain the mechanisms, if any, established by the Board of Directors to ensure that the financial statements it presents to the General Shareholders' Meeting are prepared in accordance with accounting regulations.

Article 53.3 of the Bylaws of Bankia, S.A. states that the Board of Directors will seek to definitively authorise the accounts for issue such that the auditor's report is unqualified. Nevertheless, when the Board believes it must maintain its position, it will, through the Chairman of the Audit and Compliance Committee, publicly explain the substance and scope of the discrepancy and will also seek to have the statutory auditor explain its observations in this regard.

Through the Audit and Compliance Committee, the Board of Directors oversees the entire process of preparing and authorising for issue the annual accounts of the Bank and its Group, and any quarterly and half-yearly financial reports that are prepared. One of the aims of this control and ongoing contact with the auditor is to avoid qualifications in the auditor's report.

Bankia's Audit and Compliance Committee, which is formed exclusively by non-executive directors, all of them independent, shall perform all the duties set forth in applicable legislation. In particular, without limitation, its basic responsibilities include:

Reviewing the Company's accounts to ensure compliance with legal requirements and proper application of generally accepted accounting principles and reporting on any proposals for changes to accounting standards and principles put forward by management, basing its opinion on internal audit reports, other expert reports, and management analysis and opinion, as well as information on the results of the statutory audit, although the Committee must use its judgement to draw its own conclusions. The Committee must also consider in what cases it makes sense and is feasible to involve the statutory auditors in the review of reports other than the financial statements.

Additionally, in the interests of effective supervision the Committee must hold individual meetings with management and internal audit and maintain a free flow of communication with the statutory auditor for the purpose of analysing the following matters:

- (i) The appropriateness of the scope of consolidation.
- (ii) Any judgements, criteria, valuations or estimates that have a material impact on the financial statements and related non-financial reports.
- (iii) Any changes in the significant criteria applied.
- (iv) Where applicable, the reasons why in its public reports the Company uses certain alternative performance measures (APMs) instead of the measures directly defined in the accounting standards, the extent to which those APMs provide useful information to investors and the extent to which the Company complies with international recommendations and best practice in this regard.
- (v) Any material weaknesses in internal control.
- (vi) Any material adjustments identified by the statutory auditor or resulting from reviews performed by internal audit, and management's position on such adjustments, taking into account any demands sent in the current or a previous period by the Comisión Nacional del Mercado de Valores (CNMV), in order to ensure that the incidents identified in those demands are not repeated in future financial statements.

The Committee's independence must be respected in all meetings and communications. In particular, the statutory auditor must not be invited to take part in the decision-making part of Committee meetings.

The Committee must carry out this supervisory task continuously but also on an ad hoc basis at the request of the Board of Directors.

- Reporting to the General Meeting of Shareholders on questions that are posed regarding matters falling within the competence of the Committee and, in particular, on the audit findings, explaining how the audit has contributed to the integrity of the financial information and the Committee's role in this process.

- Overseeing the effectiveness of internal control at the Company, seeking to ensure that the internal control policies and systems in place are effectively applied in practice, internal audit, regulatory compliance, the systems in place to manage and control financial and non-financial risk at the Company and, as the case may be, the Group, and discussing with the statutory auditor any material weaknesses in the internal control system that may have been detected in the audit, without jeopardizing its independence. To this end, where appropriate the Committee may make recommendations or submit proposals to the Board of Directors, including regarding the related follow-up period.

- Supervising and assessing the preparation and filing of regulatory financial and non-financial information and submitting to the Board of Directors recommendations or proposals designed to safeguard the integrity of such information and, in particular:

- Reporting to the Board of Directors, in advance, on the financial information that the Company must publish periodically;
- Reviewing the Company's accounts;
- reviewing issue prospectuses and any periodic financial information the Board is required to provide to the markets and market supervisory bodies.

- Submitting proposals to the Board of Directors for the selection, appointment, re-election and removal of the statutory auditor, and oversee the selection process in accordance with EU legislation and the terms and conditions of engagement.

- Building an appropriate relationship with the external auditors so as to receive information on any matters that could jeopardize the external auditor's independence for examination by the Committee, and on any other matters arising from the audit of the Company's accounts and, as appropriate, authorising the services permitted under the terms of EU legislation and regulations regarding independence, and making any other disclosures required under the applicable auditing legislation and standards. In particular:

- Acting as a communication channel between the Board of Directors and the internal and external auditors, evaluating the results of each audit and the responses of the management team to its recommendations and mediating in the event of disputes between the former and the latter regarding the principles and criteria applicable to the preparation of the financial statements. In particular, the Committee must ensure that the statutory auditor holds at least one meeting each year with the full board of directors to report on the work carried out and any changes in the Company's accounting situation and risks.
- Requesting regular information from the external auditor on the audit plan and its implementation and ensuring that senior management acts on the external auditor's recommendations;
- Ensuring that the external auditor meets, at least once a year, with the Board in full to inform it of the work undertaken and developments in the Company's risk and accounting positions;
- Supervising compliance with the audit contract, seeking to ensure that the opinion on the annual accounts and the principal content of the auditor's report are drafted clearly and accurately;
- Ensuring the independence of the external auditor, as set out in section C.1.30 of this Report.

Issuing a report each year, prior to the release of the auditor's report, expressing an opinion on whether the independence of the external auditor or audit firms has been compromised. This report must contain a reasoned assessment of any additional services other than the statutory audit provided, considered individually and in the aggregate, as well as of the auditor's independence and compliance with auditing standards.

C.1.29 Is the secretary of the Board also a director?

- [] Yes
[√] No

If the secretary is not a director, complete the following table:

Name or company name of the secretary	Representative
MR. MIGUEL CRESPO RODRÍGUEZ	

C.1.30 Indicate the specific mechanisms established by the company to safeguard the independence of the external auditors, and any mechanisms to safeguard the independence of financial analysts, investment banks and rating agencies, including how legal provisions have been implemented in practice.

Specific mechanisms implemented by the Company to preserve the independence of the external auditors:

As stipulated in article 14 of the Board of Directors Regulations, and in article 13 of the Audit and Compliance Committee Regulations, the Audit and Compliance Committee of Bankia S.A. is responsible, among other things, for ensuring the independence of the external auditor to which end it must:

- Request and receive from the external auditors a declaration of their independence with respect to the Company or entities directly or indirectly related thereto, as well as detailed and individualised information on additional services of any kind provided to, and the corresponding fees received from, such entities by the external auditor or persons or entities related thereto, pursuant to the rules regulating the audit profession.
- Annually, prior to the issue of the audit report, issue a report stating an opinion as to whether the independence of the auditors has been compromised. This report must contain a reasoned assessment of any additional services other than the statutory audit provided, considered individually and in the aggregate, as well as of the auditor's independence and compliance with auditing standards.
- Maintain the relationship with the statutory auditor in order to receive information about any matters that might jeopardise the auditor's independence and assess the effectiveness of the safeguards put in place. Also, understand and assess, in aggregate, all dealings between the audited entity and its related entities, on the one hand, and the statutory auditor and its network, on the other, that involve the provision of non-audit services or any other type of relationship.
- Ensure that the company and the external auditor comply with applicable rules regarding the provision of non-audit services other than auditing, limits on the concentration of the auditor's business, and, in general, all other rules regarding auditor independence.
- Ensure that the remuneration of the statutory auditor for its work does not compromise its quality or independence, taking into account the rules on fees set out in auditing standards.
- In the event that the external auditor resigns, examine the circumstances leading to such resignation.
- Make sure that the company informs the CNMV of the change of auditor, along with a statement on any differences that arose with the outgoing auditor and, if applicable, the contents thereof.
- Establish internal sources, within the Company, to obtain relevant information on the independence of the statutory auditor, from financial management, other executive functions, internal audit, or other assurance functions such as regulatory compliance or risks, or external sources such as information supplied by the statutory auditor itself.
- Seek explanations from the statutory auditor about the internal quality control system it has in place to safeguard its independence, as well as information on internal practices regarding the rotation of the audit partner and audit team and whether those practices comply with applicable Spanish and EU regulations in this respect.
- Analyse any changes in the overall remuneration of the statutory auditor.

The Bankia Group has a Policy on Monitoring the Independence of the External Auditor, which is approved by the Board of Directors and reviewed annually. The Policy specifies the control actions designed to ensure compliance with current laws and regulations on the provision of non-audit services, limits on the concentration of the auditor's business and other specific requirements in relation to the independence of the statutory auditor, in accordance with Ley 22/2015 (the Audit Law) and its implementing regulations (Royal Decree 1517/2011) and the recommendations issued by the CNMV in Technical Guide 3/2017 on audit committees at public interest entities.

Policy on Monitoring the Independence of the External Auditor

In particular, the Policy on Monitoring the Independence of the External Auditor, approved annually by the Board of Directors, sets out the mechanisms in place for overseeing the independence of the external auditor. These mechanisms are:

Conflicts of interest arising from personal situations:

- Document provided by the external auditor describing the internal control policies and procedures designed and implemented at the audit firm (and at all firms in its network) with a view to ensuring strict compliance with the independence rules applicable to audit firms.
- The Corporate Internal Audit Department requests an update of this information from the external auditor every six months, which is submitted to the Audit and Compliance Committee along with the half-yearly independence report.
- Half-yearly confirmation of the external auditor's independence implies compliance with this requirement.
- At the beginning of the period to be audited, the external auditor is asked to fully identify the team confirming the people that form it at the date of reference. The team list is updated on completion of the engagement.

- The list is sent to the Executive and People Management Department for reference in selection and hiring processes.

Prohibited services:

- The external auditor informs the Corporate Internal Audit Department of proposals submitted to the Bank before they are signed.
- The Corporate Internal Audit Department reviews proposals for services to be provided by the external auditor prior to their approval.
- The requesting department is asked by the Internal Audit Department to explain why the audit firm is suitable to provide the services by reason of its knowledge and experience.
- The external audit delivers its analysis and assessment of the collaboration proposal, from an independence perspective.
- The internal auditor submits to the Audit and Compliance Committee a monthly report setting out the engagements to be analysed and, as the case may be authorised.
- The Audit and Compliance Committee authorises services on a monthly basis.
- The authorisation of certain engagements ("with no risk to independence") is delegated to the Corporate Internal Audit Department:
- Where required or envisaged by law and/or the supervisor.
- Agreed-upon procedures and other review engagements relating to accounting and financial reporting.
- Translations.

These proposals are ratified by the Audit and Compliance Committee.

- Once the Deputy Secretariat confirms that the Audit and Compliance Committee has authorised the proposal, the external auditor and the Procurement Department are informed so that the relevant contract may be signed, as the case may be.
- The audit firm identifies the members of its team so that any previously unscreened proposals can be retrieved from our systems.
- The conflict of interest arising from providing otherwise non-prohibited services to relations of the principal auditor falls within the scope of "conflicts of interest arising from personal situations".
- The provision of services referred to in Article 5.3 (EU Regulation 537/2014) shall be limited, in its effect on the financial statements, to 5% of the materiality determined by the auditor or 10% of the account item affected. However, if lower limits are set by law, those lower limits shall apply.

(CONTINUED IN SECTION H)

C.1.31 Indicate whether the company changed its external auditor during the year. If so, identify the incoming and outgoing auditors:

[☒] Yes
[☐] No

Outgoing auditor	Incoming auditor
ERNST & YOUNG, S.L.	KPMG Auditores, S.L.

If there were any disagreements with the outgoing auditor, explain their content:

[☐] Yes
[☒] No

C.1.32 Indicate whether the audit firm performs any non-audit work for the company and/or its group and, if so, state the amount of fees it received for such work and express this amount as a percentage of the total fees invoiced to the company and/or its group for audit work:

[☒] Yes
[☐] No

	Company	Group companies	Total
Amount invoiced for non-audit services (thousands of euros)	400	0	400
Amount invoiced for non-audit work/Amount for audit work (in %)	17.36	0.00	17.36

Non-audit work refers to services rendered for the issue of comfort letters and translations, as well as tax advisory and other services.

C.1.33 Indicate whether the auditors' report on the financial statements for the preceding year contains a qualified opinion or reservations. If so, indicate the reasons given to shareholders at the general meeting by the chairman of the audit committee to explain the content and extent of the qualified opinion or reservations.

[] Yes
[☒] No

C.1.34 Indicate the number of consecutive years for which the current audit firm has been auditing the company's individual and/or consolidated financial statements. Also, indicate the number of years audited by the current audit firm as a percentage of the total number of years in which the financial statements have been audited:

	Individual	Consolidated
Number of consecutive years	1	1
	Individual	Consolidated
Number of years audited by the current audit firm/number of years in which the company has been audited (in %)	4.00	10.00

Considering that Bankia, S.A., was set up as a business enterprise in 1995 under the name Altae Banco, S.A., its individual annual accounts have been audited for 25 years. This does not take into account the fact that Banco Altae, S.A. used to be Banco de Crédito y Ahorro, S.A.

A total of 10 years have been taken into account in the case of the consolidated annual accounts.

C.1.35 Indicate whether there is a procedure for directors to be sure of having the information necessary to prepare the meetings of the governing bodies with sufficient time; provide details if applicable:

[☒] Yes
[] No

Details of the procedure

The procedure to ensure that the Directors of Bankia, S.A. have the information necessary to prepare the meetings of the governing bodies with sufficient time is regulated in Article 17.2 of the Board of Directors Regulations, which provides that the Board of Directors will be called by individual notice, stating the agenda for the meeting in sufficient detail. This notice will be sent by fax, e-mail or letter to each of the directors, at least five days in advance of the envisaged date of the meeting, unless the Chairman considers the urgency of the matters to require an urgent call, which may be made by telephone, fax, e-mail or any other telematic means, sufficiently in advance to allow the directors to fulfil their duty to attend.

Agendas for meetings will clearly indicate those points in respect of which the Board of Directors must adopt a decision or resolution, so that the directors may, in advance, study or collect the information necessary for the adoption thereof, in accordance with the Board of Directors Regulations.

When, exceptionally, for reasons of urgency, the Chairman wishes to submit decisions or resolutions not appearing on the agenda for approval of the Board of Directors, the express prior consent of the majority of the directors present will be required, with that consent to be reflected in the minutes.

The directors may gather all the additional information they consider necessary concerning the matters for which the Board of Directors is competent. In the context of this duty of directors to demand and their right to receive from the Company all the information they need in order to perform their obligations, article 26 of the Board of Directors Regulations states that directors have the broadest authority to seek information on any aspect of the Company, to examine its books, records, documents and other background information pertaining to the Company's transactions, and to inspect all its facilities.

In order not to interfere with ordinary management of the Company, exercise of information rights must be channelled through the Chairman or Secretary of the Board of Directors who will respond to director inquiries by providing the information directly, making the appropriate spokesmen within the organisation available as appropriate, or arranging for appropriate on-site review and inspection.

C.1.36 Indicate whether the company has established rules obliging directors to inform the Board of any circumstances, whether or not related to their actions in the company itself, that might harm the company's standing and reputation, tendering their resignation where appropriate. If so, provide details:

[☒] Yes
[☐] No

Explain the rules

According to article 40 of the Bylaws, the members of the Board of Directors of Bankia, S.A. must satisfy the requirements of banking regulations to be considered to be persons of good repute who are suited to exercise of such function. In particular, they must have a reputation of business and professional integrity, have knowledge and experience appropriate to the performance of their duties and be in a position to exercise good governance of the Company. Supervening failure to satisfy the above requirements will be grounds for removal of the director.

As per article 23 of the Board of Directors Regulations, directors must place their directorships at the disposal of the Board of Directors and formally tender their resignations, if the Board deems it to be desirable, in the following circumstances:

- a) When they are affected by any of the scenarios of incompatibility or prohibition or unsuitability prescribed by law.
- b) When they are tried for or accused of alleged criminal offenses or subject to disciplinary proceedings for serious or very serious infractions brought by the supervisory authorities.

For these purposes, directors of the Company must inform the Board of Directors of the existence of any circumstances - related to their activities at the Company or otherwise - that could be detrimental to the standing and reputation of the Company, and, in particular, of any criminal proceedings in which they are the party under investigation, as well as subsequent procedural developments.

Where the Board is informed or becomes aware in any other manner of any of the circumstances mentioned above, it must investigate the case as quickly as possible and, having regard to the specific circumstances, decide, based on a report from the Appointments and Remuneration Committee, whether or not any measures must be adopted, such as the opening of an internal investigation, asking the director to resign or proposing that he or she be removed by the General Meeting. These events must be reported in the annual corporate governance report, unless there are any special reasons not to do so, which must also be placed on record in the minutes. This without prejudice to the information that the company must disseminate, if appropriate, upon implementation of the corresponding measures.

- c) When they are seriously admonished by the Audit and Compliance Committee for violating their duties as directors.

- d) When their remaining as directors could present a reputation risk to the interests of the Company.
- e) When they cease to hold the positions, offices or functions with which their appointment as executive directors was associated.
- f) In the case of proprietary directors, when the shareholder at whose initiative they were appointed disposes of its interest in the Company or reduces its interest to a level that requires a reduction in the number of proprietary directors.
- g) In the case of independent directors, when they no longer satisfy the conditions for being considered independent directors.

In addition, if a natural person representing a legal person director is in any of the situations described in the previous sections, that person will be disqualified from acting as representative.

C.1.37 Indicate whether, apart from such special circumstances as may have arisen and been duly minuted, the Board of Directors has been notified or has otherwise become aware of any situation affecting a director, whether or not related to his or her actions in the company itself, that might harm the company's standing and reputation:

[] Yes
[☒] No

C.1.38 Detail any material agreements entered into by the company that come into force, are modified or are terminated in the event of a change in control of the company following a public takeover bid, and their effects.

Not applicable.

C.1.39 Identify individually as regards directors, and in aggregate form in other cases, and provide details of any agreements between the company and its directors, executives or employees containing indemnity or golden parachute clauses in the event of resignation or dismissal without due cause or termination of employment as a result of a takeover bid or any other type of transaction.

Number of beneficiaries	23
Type of beneficiary	Description of the agreement
EXECUTIVE DIRECTORS, MEMBERS OF THE MANAGEMENT COMMITTEE AND OTHER EXECUTIVES.	<p>EXECUTIVE DIRECTORS: The contracts of Mr. Goirigolzarri, Mr. Sevilla and Mr. Ortega provide for a termination benefit of one year of fixed remuneration if the Company decides to terminate their employment unilaterally or in the event of a change of control of the Company. The contracts of Mr. Sevilla and Mr. Ortega also provide for a post-contractual non-compete clause, as well as a three-month notice period. Pursuant to prevailing legislation, Bankia has amended these contracts, establishing that any compensation and/or amounts received by these executive directors must comply with Royal Decree-Law 2/2012, Law 3/2012 and Law 10/2014.</p> <p>MEMBERS OF THE MANAGEMENT COMMITTEE: The contracts of the nine senior executives include clauses that set compensation for all items at two years' fixed remuneration if they are dismissed on lawful grounds, except in the case of disciplinary dismissals declared valid by the courts. Pursuant to prevailing legislation, Bankia has amended these contracts, establishing that any</p>

	compensation and/or amounts received by senior executives must comply with Royal Decree-Law 2/2012, Law 3/2012 and Law 10/2014. OTHER EXECUTIVES: In no circumstances may the maximum severance recognised in the case of dismissal on lawful grounds, except in the case of disciplinary dismissal declared valid by the courts, exceed two years' fixed remuneration.
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Indicate whether, beyond the cases established by legislation, these agreements have to be communicated and/or authorised by the governing bodies of the company or its group. If so, specify the procedures, the cases concerned and the nature of the bodies responsible for their approval or communication:

	Board of Directors	General shareholders' meeting
Body authorising the clauses	√	

	Yes	No
Are these clauses notified to the General Shareholders' Meeting?	√	

Indemnity or golden parachute clauses are authorised by several bodies:

-Executive Directors: Authorised by the Board of Directors and reported at the General Meeting of Shareholders.

-Members of the Management Committee and persons reporting to the Board or any of its members: Authorised by the Board of Directors at the proposal of the Remuneration Committee.

Other executives: Authorised in accordance with delegated powers and authority regarding Human Resources approved by the Board of Directors.

C.2. Committees of the Board of Directors

C.2.1 Provide details of all committees of the Board of Directors, their members, and the proportion of executive, proprietary, independent and other external directors forming them:

RISK ADVISORY COMMITTEE		
Name	Position	Category
MR. JOAQUÍN AYUSO GARCÍA	CHAIRMAN	Independent
MR. FERNANDO FERNÁNDEZ MÉNDEZ DE ANDÉS	COMMITTEE MEMBER	Independent

MRS. LAURA GONZÁLEZ MOLERO		COMMITTEE MEMBER	Independent
MR. ANTONIO GREÑO HIDALGO		COMMITTEE MEMBER	Independent
% of executive directors	0.00		
% of proprietary directors	0.00		
% of independent directors	100.00		
% of other external directors	0.00		

On 27 March 2020, following a favourable report from the Appointments and Responsible Management Committee, the Board of Directors resolved to re-elect Mr. Joaquín Ayuso García, Ms. Eva Castillo Sanz and Mr. Antonio Greño Hidalgo as members of the Risk Advisory Committee, as well as to re-elect Mr. Joaquín Ayuso García as Chairman of the Risk Advisory Committee.

On 27 May 2020, following a favourable report from the Appointments and Responsible Management Committee, the Board of Directors resolved to appoint Mrs. Laura González Molero as a member of the Risk Advisory Committee, replacing Mrs. Eva Castillo Sanz who stood down as a member of that Committee.

Explain the functions delegated or assigned to this committee, other than those that have already been described in Section C.1.9, and describe the rules and procedures for its organisation and functioning. For each of these functions, briefly describe its most important actions during the year and how it has exercised in practice each of the functions assigned to it by law, in the articles of incorporation or in other corporate resolutions.

FUNCTIONS:

Bankia's Risk Advisory Committee is assigned all of the duties required by law, particularly by banking regulations. In view of the extent of such duties, they are presented in section H of this Report.

RULES OF ORGANISATION AND FUNCTIONING:

With respect to its rules of organisation and functioning, article 47 ter of the Bylaws and article 16 of Board of Directors Regulations state that the Risk Advisory Committee will be comprised of a minimum of three and maximum of five directors, who may not be executive directors, without prejudice to attendance, when so expressly resolved by the members of the Committee, by other directors, including executive directors, senior executives and any employee. In any event, the number of members of the Risk Advisory Committee will be determined directly by means of an express resolution in this regard, or indirectly by the filling of vacancies or appointment of new members within the established maximum.

The members of the Risk Advisory Committee must have the appropriate knowledge, skills and experience to fully understand and control the risk strategy and risk propensity of the Company. At least one third of its members must be independent directors. In any event, the Chairman of the Committee will be an independent director. The Chairman of the Committee must be replaced every four years, and may be re-elected one or more times for terms of the same length.

The members of the Risk Advisory Committee will be appointed by the Board of Directors, taking into account the directors' knowledge, skills and experience and the Committee's duties.

There will be a quorum for Committee meetings when the majority of the directors that are a part thereof are present, in person or by proxy. It will adopt its resolutions by absolute majority of the members of the Committee present at the meeting in person or by proxy. In the event of a tie, the Chairman will have the casting vote.

For the proper performance of its duties, the Risk Advisory Committee will have unrestricted access to the information on the risk status of the Company and, if necessary, to the risk management unit and specialised external advisors.

The Director of the risk unit will be a senior executive, meeting the requirements set forth in the applicable regulations and having direct access in the performance of his/her duties to both the Board of Directors and the Board and Advisory Risk Committees, that Director being removable in accordance with the provisions of applicable regulations.

ACTIONS:

Regarding the main actions carried out in 2020, the Risk Advisory Committee advised the Board of Directors on the following key matters:

- Advice on the definition of the overall propensity to risk of the Company and the Group, set out in the Risk Appetite and Tolerance Framework and in the Risk Budget.
- Advice on the approval of the risk control and management policy of the Company and the Group, identifying the various types of risk assumed by the Company and the Group, the information and internal control systems for managing and controlling risks, the levels of risk they are willing to take and the necessary corrective measures to limit their impact.
- Advice on the approval of Risk Manuals and Policies.
- Regular monitoring of the loan portfolio and the risks assumed by the Company and the Group, in the broadest sense, proposing to the Board the necessary corrective measures to adapt the risk assumed to the approved risk profile.
- Regular monitoring of projects and activities related to the supervisory bodies.

(CONTINUED IN SECTION H)

APPOINTMENTS AND RESPONSIBLE MANAGEMENT COMMITTEE		
Name	Position	Category
MRS. EVA CASTILLO SANZ	CHAIRMAN	Independent
MR. JOAQUÍN AYUSO GARCÍA	COMMITTEE MEMBER	Independent
MRS. LAURA GONZÁLEZ MOLERO	COMMITTEE MEMBER	Independent
MR. FRANCISCO JAVIER CAMPO GARCÍA	COMMITTEE MEMBER	Independent
% of executive directors	0.00	
% of proprietary directors	0.00	
% of independent directors	100.00	
% of other external directors	0.00	

On 27 March 2020, following a favourable report from the Appointments and Responsible Management Committee, the Board of Directors resolved to re-elect Ms. Eva Castillo Sanz, Mr. Joaquín Ayuso García and Mr. Francisco Javier Campo García as members of the Appointments and Responsible Management Committee, as well as to re-elect Ms. Eva Castillo Sanz as Chairwoman of the Appointments and Responsible Management Committee.

Explain the functions assigned to this committee, including where applicable those that are additional to those prescribed by law, and describe the rules and procedures for its organisation and functioning. For each of these functions, briefly describe its most important actions during the year and how it has exercised in practice each of the functions assigned to it by law, in the articles of incorporation or in other corporate resolutions.

FUNCTIONS:

Bankia's Appointments and Responsible Management Committee is assigned all the duties required in company law and banking regulations, as well as those set out in the Good Governance Code of Listed Companies revised by the CNMV in June 2020 and in Technical Guide 1/2019, of the Spanish National Securities Market Commission (CNMV), on appointments and remuneration committees, which, in view of their extent, are presented in section H of this Report.

The main role of the Appointments and Responsible Management Committee is to contribute to attracting and retaining talent, seeking to ensure that the Company has the best professionals in its governing bodies and senior management. The Committee's tasks also include reviewing the Company's corporate social responsibility and environmental and social sustainability policy, and ensuring that the Company's environmental and social practices are in alignment with the established strategy and policy. In addition to any other tasks assigned to it by the Board, the Committee has general powers to report on and propose the appointment and removal of directors and senior executives, on matters relating to responsible management and, in particular, without limitation, on the responsibilities within the scope of the Committee's Regulations.

RULES OF ORGANISATION AND FUNCTIONING:

The Committee's rules of organisation and functioning are set forth in Article 47 of the Bylaws and Article 15 of the Board of Directors Regulations and, specifically, in the Appointments and Responsible Management Committee Regulations.

The rules provide that the Appointments and Responsible Management Committee shall be made up of non-executive directors and a majority of independent directors, with a minimum of three and a maximum of five directors.

The members of the Appointments and Responsible Management Committee shall be appointed by the Board of Directors, having regard to their knowledge, skills and experience and the duties of the Committee. The members of the Committee, as a whole, must have knowledge and experience in the following areas:

- a) Corporate governance;
- b) Analysis and strategic evaluation of human resources;
- c) Selection of directors and senior executives, including assessment of any suitability requirements that may be required under the regulations applicable to the Company; and
- d) Performance of senior management duties.

Efforts will be made to ensure that the membership of the Committee is diverse, taking into account gender, career record, skills, personal capabilities and expertise. When the Company appoints an Independent Coordinating Director, it shall endeavour to appoint him/her as a member of the Appointments and Responsible Management Committee.

The Committee must be chaired by an independent director appointed by the Board of Directors. Previous experience as a member of appointment committees or as an executive director or member of senior management in comparable companies in terms of size and complexity is particularly valued. The Chairman of the Committee must be replaced every four years, and may be re-elected one or more times for terms of the same length.

The Chairman of the Committee shall act as its spokesperson at the meetings of the Board of Directors and, where appropriate, the General Meeting of Shareholders of the Company.

The Chairman of the Committee shall ensure that the members of the Committee receive sufficient information to perform their duties, and the members may request any additional information they require to do so.

The Committee will have a Secretary and, optionally, an Assistant Secretary, who need not be directors and may be different to the Secretary and Assistant Secretary of the Board of Directors, respectively.

The Committee shall meet suitably in advance of Board meetings whenever convened by a resolution of the Committee itself or its Chairman, and at least four times a year. It shall also meet whenever the Board of Directors or its Chairman requests the issue of a report or adoption of proposals.

Coordination mechanisms shall be established with the Remuneration Committee to ensure consistency in the policies and criteria applied by the Committee to attract talent, and with the Audit and Compliance Committee to coordinate their respective functions as regards communications and dealings with shareholders, investors and proxy advisors. In particular, joint meetings shall be held with the Remuneration Committee when warranted by the situation and when thought appropriate. A member may form part of both committees.

There will be a quorum for the Appointments and Responsible Management Committee meetings when the majority of the directors that are a part thereof are in attendance, in person or by proxy.

The Committee shall adopt resolutions by absolute majority of the members present at the meeting in person or by proxy. In the event of a tie, the Chairman will have the casting vote.

The Remuneration Committee must consult with the Chairman and the chief executive of the Company, especially on matters relating to executive directors and senior executives.

The Chairman and any director may submit suggestions to the Committee regarding matters that fall within their remit and, in particular, may put forward potential candidates to fill vacancies on the Board.

(CONTINUED IN SECTION H)

REMUNERATION COMMITTEE		
Name	Position	Category
MR. ANTONIO GREÑO HIDALGO	CHAIRMAN	Independent
MR. JOAQUÍN AYUSO GARCÍA	COMMITTEE MEMBER	Independent
MR. JORGE COSMEN MENÉNDEZ-CASTAÑEDO	COMMITTEE MEMBER	Independent

MRS. LAURA GONZÁLEZ MOLERO		COMMITTEE MEMBER	Independent
% of executive directors	0.00		
% of proprietary directors	0.00		
% of independent directors	100.00		
% of other external directors	0.00		

On 27 March 2020, following a favourable report from the Appointments and Responsible Management Committee, the Board of Directors resolved to re-elect Mr. Joaquín Ayuso García as a member of the Remuneration Committee and to appoint Mr. Antonio Greño Hidalgo as a member and Chairman of the Remuneration Committee in lieu of Mr. Francisco Javier Campo García, who stood down as member and Chairman of the Remuneration Committee.

Explain the functions assigned to this committee, including where applicable those that are additional to those prescribed by law, and describe the rules and procedures for its organisation and functioning. For each of these functions, briefly describe its most important actions during the year and how it has exercised in practice each of the functions assigned to it by law, in the articles of incorporation or in other corporate resolutions.

FUNCTIONS:

Bankia's Remuneration Committee is assigned all the duties required in company law and banking regulations, as well as those set out in the Good Governance Code of Listed Companies and in Technical Guide 1/2019, of the Spanish National Securities Market Commission (CNMV), on appointments and remuneration committees, which, in view of their extent, are presented in section H of this Report.

In addition to any other tasks assigned to it by the Board, the Remuneration Committee has general powers to report on and propose the remuneration of directors and senior executives, and, in particular and without limitation, the powers set out in the Committee's Regulations.

RULES OF ORGANISATION AND FUNCTIONING:

The rules on functioning and organization are set out in article 47 bis of the Bylaws and article 15 bis of the Board of Directors Regulations and, specifically, in the Remuneration Committee Regulations.

The rules provide that the Remuneration Committee shall be made up of non-executive directors and a majority of independent directors, with a minimum of three and a maximum of five directors.

The members of the Appointments and Responsible Management Committee shall be appointed by the Board of Directors, having regard to their knowledge, skills and experience and the duties of the Committee. The members of the Committee, as a whole, must have knowledge and experience in the following areas:

- a) Corporate governance;
- b) Analysis and strategic evaluation of human resources;
- c) Performance of senior management duties; and
- d) Design of policies and remuneration plans for directors and senior executives.

Efforts will be made to ensure that the membership of the Committee is diverse, taking into account gender, career record, skills, personal capabilities and industry expertise. When the Company appoints an Independent Coordinating Director, it shall endeavour to appoint him/her as a member of the Remuneration Committee.

The Committee must be chaired by an independent director appointed by the Board of Directors. Previous experience as a member of remuneration committees or as an executive director or member of senior management in comparable companies by reason of size and complexity is particularly valued. The Chairman of the Committee must be replaced every four years, and may be re-elected one or more times for terms of the same length.

The Chairman of the Committee shall act as its spokesperson at the meetings of the Board of Directors and, where appropriate, the General Meeting of Shareholders of the Company.

The Chairman of the Committee shall ensure that the members of the Committee receive sufficient information to perform their duties, and the members may request any additional information they require to do so.

The Committee will have a Secretary and, optionally, an Assistant Secretary, who need not be directors and may be different to the Secretary and Assistant Secretary of the Board of Directors, respectively.

The Committee shall meet suitably in advance of Board meetings whenever convened by a resolution of the Committee itself or its Chairman, and at least four times a year. It shall also meet whenever the Board of Directors or its Chairman requests the issue of a report or adoption of proposals.

Coordination mechanisms shall be established with the Appointments and Responsible Management Committee to ensure consistency of the policies and criteria applied by the Committee to attract and retain talent. In particular, joint meetings shall be held when warranted by the situation. A member may form part of both committees.

There will be a quorum for Remuneration Committee meetings when the majority of the directors that are a part thereof are in attendance, in person or by proxy.

In addition to the attendance of all members of the Committee at its meetings, the presence at meetings of other directors, executive or otherwise, of senior executives or of any third party may only occur at the invitation of the Chairman of the Committee and shall be limited to the specific items on the agenda in connection with which they are invited.

The Committee shall adopt resolutions by absolute majority of the members present at the meeting in person or by proxy. In the event of a tie, the Chairman will have the casting vote.

The Remuneration Committee must consult with the Chairman and the chief executive of the Company, especially on matters relating to executive directors and senior executives.

To perform its functions more effectively, the Committee may use whatever resources it considers appropriate, including taking advice from outside professionals in matters falling within its remit, ensuring suitable alignment of interests and that no potential conflicts of interest compromise the independence of the external advice given to the Committee. The Committee shall receive adequate funds for this purpose and shall submit to the Board for approval an annual budget, or alternative mechanisms.

If advisors are retained to assist the Committee in its remuneration policy role, an effort shall be made to ensure that they are different from any advisors who might assist the Appointments and Responsible Management Committee in its selection, appointment and assessment roles.

(CONTINUED IN SECTION H)

TECHNOLOGY AND INNOVATION COMMITTEE		
Name	Position	Category
MR. JOSÉ IGNACIO GOIRIGOLZARRI TELLAECHÉ	CHAIRMAN	Executive
MR. FRANCISCO JAVIER CAMPO GARCÍA	COMMITTEE MEMBER	Independent
MRS. EVA CASTILLO SANZ	COMMITTEE MEMBER	Independent
MS. NURIA OLIVER RAMÍREZ	COMMITTEE MEMBER	Independent
MR. ANTONIO ORTEGA PARRA	COMMITTEE MEMBER	Executive
% of executive directors	40.00	
% of proprietary directors	0.00	
% of independent directors	60.00	
% of other external directors	0.00	

On 27 May 2020, following a favourable report by the Audit and Compliance Committee and the Appointments and Responsible Management Committee, the Board of Directors resolved to create a new Board Committee - the Technology and Innovation Committee -, to be formed by five directors: Mr. José Ignacio Goirigolzarri Tellaeché (chairman), Mr. Francisco Javier Campo García (member), Ms. Eva Castillo Sanz (member), Ms. Nuria Oliver Ramírez (member), Mr. Antonio Ortega Parra (member) and Mr. Miguel Crespo Rodríguez (non-director secretary).

Explain the functions delegated or assigned to this committee, other than those that have already been described in Section C.1.9, and describe the rules and procedures for its organisation and functioning. For each of these functions, briefly describe its most important actions during the year and how it has exercised in practice each of the functions assigned to it by law, in the articles of incorporation or in other corporate resolutions.

On 27 May 2020, the Board of Directors resolved to amend the Board of Directors Regulations to include article 14 bis, in order to regulate the functions, composition and rules of operation of the Technology and Innovation Committee.

The Technology and Innovation Committee is a permanent internal body of the Board of Directors. It is an advisory body, without executive functions and with powers to report on, oversee, advise on and make recommendations on matters falling within its area of activity. It is governed by the provisions of the Law, the Bylaws and the Board of Directors Regulations.

FUNCTIONS:

The functions of the Technology and Innovation Committee are as follows:

- a) To assist the Board of Directors with its supervisory and decision-making responsibilities as regards technology-related matters affecting activities and strategy with an impact on the Bank's business, taking a holistic approach.
- b) To familiarise itself with and report on the technology, innovation, cyber security and data analytics policies prior to their submission to the Board of Directors for approval.
- c) To supervise and monitor any specific plans and projects of particular relevance deriving from such policies.
- d) To discuss these matters, proposing initiatives for the consideration of the Board.

To fulfil its remit and discharge its duties, the Technology and Innovation Committee must, inter alia:

- a) Examine and report on plans and actions relating to IT systems.
- b) Examine and report on plans and actions relating to innovation.
- c) Familiarise itself with, examine and report on data analytics plans and their use in order to gain a better knowledge of customers and improve their experience, as well as in relation to new business solutions, fraud detection, preparation of risk models and other fields.
- d) Examine and report on plans and actions relating to the efficacy, reliability and strength of technological systems and cybersecurity management.
- e) Make proposals to the Board of Directors in relation to the technology and data management frameworks at the Company.
- f) Assist the Board of Directors with the analysis and approval of strategic lines of technology and innovation.
- g) Report to the Board of Directors on the annual systems plan.
- h) Assist the Board of Directors with the technological service quality assessment.
- i) Assist and collaborate with other Board Committees with specific powers in relation to which technology and innovation may be relevant, particularly in the areas of risk, regulation and compliance.

RULES OF ORGANISATION AND FUNCTIONING:

As regards its rules of organisation and functioning, article 14 bis of the Bylaws states that the Technology and Innovation Committee will be comprised of a minimum of three and maximum of seven directors, without prejudice to attendance, when so expressly resolved by the members of the Committee, of other directors, senior executives and any other employees. The majority of the members of the Technology and Innovation Committee must be non-executive directors, reflecting, as the case may be, the guidelines on the composition of the Board. The Chairman of the Technology and Innovation Committee may either be an independent director or an executive director, appointed by the Board of Directors. The Chairman of the Committee must be replaced every four years, and may be re-elected one or more times for terms of the same length.

The members of the Technology and Innovation Committee will be appointed by the Board of Directors, taking into account the directors' knowledge, skills and experience and the matters dealt with by the Committee.

The Committee will have a Secretary and, optionally, an Assistant Secretary, who need not be directors and may be different to the Secretary and Assistant Secretary of the Board of Directors, respectively.

To permit it to discharge its duties the executive directorates responsible for activities relating to technology, new digital business models, data analytics and artificial intelligence and any other considered appropriate shall report to the Committee as often as is deemed fit.

The persons called to the meetings of the Technology and Innovation Committee shall appear at the invitation of the Committee Chairman on the terms decided by the Committee, and shall be obliged to cooperate and facilitate access to the information they have at their disposal.

To fulfil its mandate and functions, the Technology and Innovation Committee shall approve an annual calendar of meetings which shall include at least four meetings. In any event, the Technology and Innovation Committee shall meet as often as it is called by resolution of the Committee itself or its Chairman.

Meetings of the Technology and Innovation Committee will be validly constituted when more than half of its members are present in person or by proxy. Resolutions will be adopted by a majority of the members present at the meeting in person or by proxy. In the event of a tie, the Chairman will have the casting vote. Committee members may delegate their vote to another member, bearing in mind that non-executive directors may only delegate their votes to another non-executive director.

The Technology and Innovation Committee, via its chairman, shall report to the Board of Directors on its activity and work. The supporting documentation provided to the Technology and Innovation Committee and a copy of all of the minutes of the Committee's meetings shall be made available to all directors.

(CONTINUED IN SECTION H)

BOARD RISK COMMITTEE		
Name		Position
MR. JOSÉ SEVILLA ÁLVAREZ		CHAIRMAN
MRS. EVA CASTILLO SANZ		COMMITTEE MEMBER
MR. FERNANDO FERNÁNDEZ MÉNDEZ DE ANDÉS		COMMITTEE MEMBER
% of executive directors	33.33	
% of proprietary directors	0.00	
% of independent directors	66.67	
% of other external directors	0.00	

On 27 March 2020, following a favourable report from the Appointments and Responsible Management Committee, the Board of Directors resolved to re-elect Mr. José Sevilla Álvarez and Ms. Eva Castillo Sanz as members of the Board Risk Committee, as well as to re-elect Mr. José Sevilla Álvarez as Chairman of the Board Risk Committee.

Explain the functions delegated or assigned to this committee, other than those that have already been described in Section C.1.9, and describe the rules and procedures for its organisation and functioning. For each of these functions, briefly describe its most important actions during the year and how it has exercised in practice each of the functions assigned to it by law, in the articles of incorporation or in other corporate resolutions.

FUNCTIONS:

The Board Risk Committee is governed by article 48 of the Bylaws and article 16 bis of the Board of Directors Regulations. The Board Risk Committee is the body responsible for approving risks within the scope of the authority delegated to it and

for overseeing and administering the exercise of the authority delegated to lower-ranking bodies, all this without prejudice to the oversight authority vested by law in the Audit and Compliance Committee. A list of this Committee's functions is provided in section H of this Report.

RULES OF ORGANISATION AND FUNCTIONING:

As regards the rules of organisation and functioning, article 48 of the Bylaws and article 16 bis of the Board of Directors Regulations state that the Board Risk Committee will be made up of no fewer than 3 and no more than 7 directors. The Chairman of the Committee will be a director appointed by the Company's Board of Directors.

The Board Risk Committee shall be validly constituted when a majority of the directors forming part of it are present, in person or by proxy. Committee resolutions shall be adopted by an absolute majority of members present at the meeting, in person or by proxy. In the event of a tie, the Chairman will have the casting vote.

The Board Risk Committee is an executive body and, therefore, may adopt the corresponding decisions within the scope of authority delegated by the Board.

The Board Risk Committee will have the delegated powers specifically contemplated in the delegation resolution.

Also, copies of the minutes of meetings of this Committee's meetings will be made available to all directors.

ACTIONS:

Regarding the main actions carried out in 2020, the Board Risk Committee's principle activity consists of approving risks within the scope of the authority delegated to it and overseeing and administering the exercise of the authority delegated to lower-ranking bodies.

Given the executive nature of the Board Risk Committee, at its meetings the Committee analyses and, where appropriate, approves all specific risk transactions, finance programmes and the overall limits of pre-classification falling within the scope of the authority delegated to it by the Board of Directors. It also assesses and puts forward, as appropriate, proposals of this nature, which must be approved by the Board of Directors.

(CONTINUED IN SECTION H)

AUDIT AND COMPLIANCE COMMITTEE		
Name	Position	Category
MR. FRANCISCO JAVIER CAMPO GARCÍA	CHAIRMAN	Independent
MR. CARLOS EGEA KRAUEL	COMMITTEE MEMBER	Other external
MR. JOSE LUIS FEITO HIGUERUELA	COMMITTEE MEMBER	Independent
MR. FERNANDO FERNÁNDEZ MÉNDEZ DE ANDÉS	COMMITTEE MEMBER	Independent
MR. ANTONIO GREÑO HIDALGO	COMMITTEE MEMBER	Independent
% of executive directors	0.00	
% of proprietary directors	0.00	
% of independent directors	80.00	
% of other external directors	20.00	

On 27 March 2020, following a favourable report by the Appointments and Responsible Management Committee, the Board of Directors resolved to re-elect Mr. Francisco Javier Campo García and Mr. Antonio Greño Hidalgo as members of the Audit and Compliance Committee, as well as to appoint Mr. Francisco Javier Campo García as Chairman of the Audit and Compliance Committee, in lieu of Mr. Antonio Greño Hidalgo, who had held such office until then.

Explain the functions assigned to this committee, including where applicable those that are additional to those prescribed by law, and describe the rules and procedures for its organisation and functioning. For each of these functions, briefly describe

its most important actions during the year and how it has exercised in practice each of the functions assigned to it by law, in the articles of incorporation or in other corporate resolutions.

FUNCTIONS:

The Audit and Compliance Committee of Bankia is assigned all the duties required in company law and banking regulations, as well as those set out in the Good Governance Code of Listed Companies revised by the CNMV in June 2020 and in Technical Guide 1/2019, of the Spanish National Securities Market Commission (CNMV) on audit committees at public interest entities, which, in view of their extent, are presented in section H of this Report.

RULES OF ORGANISATION AND FUNCTIONING:

With respect to its rules of organisation and functioning, article 14 of the Board of Directors Regulations and the Audit and Compliance Committee Regulations state that the Audit and Compliance Committee will have no fewer than three (3) and no more than five (5) members, all of whom will be non-executive directors and a majority, independent. Where the members of the committee expressly so agree, and subject to invitation by the Chairman, its meetings may also be attended by other directors, including executive directors, senior executives and any other employees, to deal only with the specific business on the agenda in connection with which they are invited, and they shall leave the meeting prior to deliberation and decision-making in such regard.

The members of the Audit and Compliance Committee will be appointed by the Board of Directors taking account of their knowledge, skills and experience in accounting, auditing and financial and non-financial risk management as well as the duties of the Committee and, together, the committee members must possess all of the above expertise, as well as the relevant technical knowledge in relation to the banking industry.

The Committee will be chaired by an independent director who must also possess the relevant knowledge, skills and experience in accounting, auditing and financial and non-financial risk management and, in general, any other duties of the Committee. The Chairman of the Committee must be replaced every four years, and may be re-elected after a period of one year elapses since he left office. The Chairman of the Committee may, at any time, request information on the internal audit activities underway from the head of internal audit at the Company. Also, independently of organisational reporting lines, the head of internal audit will maintain a constant functional relationship with the Audit and Compliance Committee and its Chairman. In any event, the Committee shall oversee the performance of the internal audit unit.

The Committee will have a Secretary and, optionally, an Assistant Secretary, who need not be directors and may be different to the Secretary and Assistant Secretary of the Board of Directors, respectively.

The Committee must meet as many times as it is convened by resolution of the Committee itself or its Chairman and no less than four times per year. Any members of the Company's management team or staff who are called upon to do so are obliged to attend the meetings of the Committee and to cooperate with it and make available any information they may have at their disposal. The Committee may also call upon the statutory auditor to attend, although it must not be invited to take part in the decision-making part of Committee meetings. The Committee must always meet on the occasion of the publication of annual or interim financial information and in these cases may be attended by the internal auditor and, if it has issued any type of review report, the statutory auditor, to provide input on the agenda items for which they have been invited to attend. At least part of these meetings with the internal or statutory auditor must take place without the management team being present, so that any specific issues arising from the audit reviews can be discussed exclusively with the auditor.

One of the Committee's meetings must be used to assess the efficiency of the Company's governance rules and procedures and the extent of the Company's compliance with them and to prepare the information the Board must approve and include in the annual public documentation.

At least twice a year, the Committee must hold joint sessions with the Risk Advisory Committee to discuss common concerns and any other matters that fall within the remit of both committees and so must be examined and supervised by both.

Meetings of the Audit and Compliance Committee will be validly constituted when a majority of the Committee's members are present in person or by proxy. Resolutions will be adopted by absolute majority of the members present at the meeting in person or by proxy. In the event of a tie, the Chairman will have the casting vote. The members of the Committee may extend proxies to other members. The resolutions of the Audit and Compliance Committee will be recorded in a minutes book, each entry in which will be signed by the Chairman and the Secretary.

Before they attend their first meeting, new members of the Audit Committee must complete an orientation programme that will quickly equip them with sufficient knowledge of the Company to be able to participate actively from the outset.

(CONTINUED IN SECTION H)

Identify the directors who are members of the audit committee and have been appointed taking into account their knowledge and experience in accounting or audit matters, or both, and state the date on which the Chairperson of this committee was appointed.

Names of directors with experience	MR. FRANCISCO JAVIER CAMPO GARCÍA / MR CARLOS EGEA KRAUEL / MR JOSÉ LUIS FEITO HIGUERUELA / MR FERNANDO FERNÁNDEZ MÉNDEZ DE ANDÉS / MR. ANTONIO GREÑO HIDALGO
Date of appointment of the chairperson	27/03/2020

C.2.2 Complete the following table with information regarding the number of female directors who were members of Board committees at the close of the past four years:

	Number of female directors							
	Year 2020		Year 2019		Year 2018		Year 2017	
	Number	%	Number	%	Number	%	Number	%
RISK ADVISORY COMMITTEE	1	25.00	1	25.00	1	33.33	1	33.33
APPOINTMENTS AND RESPONSIBLE MANAGEMENT COMMITTEE	2	50.00	2	50.00	1	25.00	0	0.00
REMUNERATION COMMITTEE	1	25.00	1	25.00	1	25.00	1	25.00
TECHNOLOGY AND INNOVATION COMMITTEE	2	20.00	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
BOARD RISK COMMITTEE	1	33.33	1	33.33	1	25.00	1	25.00
AUDIT AND COMPLIANCE COMMITTEE	0	0.00	0	0.00	0	0.00	0	0.00

C.2.3 Indicate, where applicable, the existence of any regulations governing Board committees, where these regulations are to be found, and any amendments made to them during the year. Also indicate whether any annual reports on the activities of each committee have been voluntarily prepared.

AUDIT AND COMPLIANCE COMMITTEE

The regulations governing the Audit and Compliance Committee are set out in the Bylaws (articles 44 and 46), in the Board of Directors Regulations (articles 12 and 14) and in the Audit and Compliance Committee Regulations.

The Audit and Compliance Committee Regulations were modified in 2020 to bring the Committee's functions into line with the provisions of the Good Governance Code of Listed Companies reviewed by the Spanish National Securities Market Commission (CNMV) in June 2020.

The Audit and Compliance Committee presented the Board of Directors with a report on its activities, detailing the tasks performed by the Committee in relation to the duties falling within its remit for 2019. This report was made available to the shareholders for the General Meeting of Shareholders held on 27 March 2020.

APPOINTMENTS AND RESPONSIBLE MANAGEMENT COMMITTEE

The regulations governing the Appointments and Responsible Management Committee are set out in the Bylaws (articles 44 and 47), in the Board of Directors Regulations (articles 12 and 15) and in the Appointments and Responsible Management Regulations.

The Appointments and Responsible Management Committee Regulations were modified in 2020 to bring the Committee's functions into line with the Good Governance Code of Listed Companies reviewed by the Spanish National Securities Market Commission (CNMV) in June 2020.

The Appointments and Responsible Management Committee also presented the Board with a report on its activities, detailing the tasks performed by this Committee in relation to the duties falling within its remit for 2019. This report was made available to the shareholders for the General Meeting of Shareholders held on 27 March 2020.

REMUNERATION COMMITTEE

The regulations governing the Remuneration Committee are set out in the Bylaws (articles 44 and 47 bis), in the Board of Directors Regulations (articles 12 and 15 bis) and in the Remuneration Committee Regulations.

The Remuneration Committee presented the Board with a report on its activities, detailing the tasks performed by this Committee in relation to the duties falling within its remit for 2019. This report was made available to the shareholders for the General Meeting of Shareholders held on 27 March 2020.

RISK ADVISORY COMMITTEE

The Risk Advisory Committee Regulations are set out in the Bylaws (articles 44 and 47 ter) and the Board of Directors Regulations (articles 12 and 16).

In the 2020 period, the Risk Advisory Committee regulations were not amended.

The Risk Advisory Committee presented the Board with an annual report on its activities, detailing the tasks performed by this Committee in relation to the duties falling within its remit for 2019.

BOARD RISK COMMITTEE

The regulations governing the Board Risk Committee are set out in the Bylaws (articles 44 and 48) and the Board of Directors Regulations (articles 12 and 16 bis).

In the 2020 period, the Board Risk Committee regulations were not amended.

The Board Risk Advisory Committee presented the Board with an annual report on its activities, detailing the tasks performed by this Committee in relation to the duties falling within its remit for 2019.

The regulations governing the Technology and Innovation Committee are set out in article 14 bis of the Board of Directors Regulations.

On 27 May 2020 the Board of Directors resolved to amend the Board of Directors Regulations to include an article 14 bis, in order to regulate the functions, composition and rules of operation of the Technology and Innovation Committee. The Technology and Innovation Committee Regulations have not been amended between that date and the close of 2020.

The Bylaws, the Board of Directors Regulations, the Audit and Compliance Committee Regulations, the Appointments and Responsible Management Committee Regulations and the Remuneration Committee Regulations, as well as the compositions of the aforementioned Committees, are permanently available on Bank's website: www.bankia.com (in the "Corporate Governance and Remuneration Policy" section of "Shareholders and Investors" area).

D. RELATED-PARTY AND INTRAGROUP TRANSACTIONS

D.1. Describe, if applicable, the procedure and competent bodies for the approval of related party and intragroup transactions.

Article 35 of the Board of Directors Regulations

According to article 35 of the Board of Directors Regulations of Bankia, S.A., the Board of Directors must review any transactions the Company engages in, directly or indirectly, with directors, shareholders or persons related to them.

Engaging in such transactions will require authorisation of the Board, after a favourable report from the Audit and Compliance Committee. The aforesaid transactions will be evaluated from the point of view of equal treatment and market terms, and will be included in the periodic public reporting on the terms contemplated in the applicable regulations.

There will be no obligation to advise the Board, or seek the authorisation contemplated in the preceding section, in the case of transactions with shareholders that simultaneously satisfy the following three conditions:

- a) they are pursuant to contracts the terms of which are basically standardised and are customarily applied to customers contracting the type of product or service in question;
- b) they are at prices or tariffs established on a general basis by the party acting as the supplier of the goods or services in question or, when the transactions relate to goods or services for which there are no established tariffs, they are on customary market terms, comparable to those applied in commercial relationships maintained with customers with similar characteristics; and
- c) the amount is no more than 1% of the Company's annual revenues.

Transactions with directors will at all times be subject to the authorisation of the Board of Directors, except in the case of credit, loan or guarantee transactions the amount of which is not more than the amount determined by the Board of Directors, simultaneously satisfying conditions (a) and (b) as set forth in the section above.

Directors will be in breach of their duty of loyalty to the Company if, with prior knowledge, they allow or fail to disclose the existence of related-party transactions not subject to the conditions and oversight referred to in Article 35 of the Regulations.

In 2020, prior to approval by the Board of Directors, the Audit and Compliance Committee reported on the transactions that, in accordance with article 35 of the Board of Directors Regulations, are considered related-party transactions.

Framework agreement

With respect to relations between Bankia and BFA, on 28 February 2018, the entities signed a Framework Agreement, providing, inter alia, that the relations between Bankia and BFA in effect at that time, and any relations, services or transactions that might be arranged in future, will be referred to as the "Related-Party Transactions". For the purposes of the Framework Agreement, "related-party transactions" means the performance, between the parties, of any financial or non-financial transaction, service, transfer, acquisition or investment or disposal concluded directly between them or through any companies belonging to their consolidated groups. Bankia and BFA undertook to ensure that any intra-group service or transaction will always have a contractual basis and, subject to the provisions of each individual contract, that all related-party transactions are governed by the general principles set out in the Framework Agreement.

The Framework Agreement is available for consultation on the corporate website (www.bankia.com).

D.2. Describe any transactions that are significant, either because of the amount involved or the subject matter, entered into between the company or entities within its group and the company's significant shareholders:

Name or company name of the significant shareholder	Name or company name of the company or group entity	Nature of the relationship	Type of transaction	Amount (thousands of euros)
No data				N.A.

No significant shareholder or any party related thereto concluded relevant transactions with the Bank outside the ordinary course of business or not at arm's length, in accordance with Order EHA/3050/2004 of 15 September 2004, on related-party transactions to be disclosed in half-yearly reporting by issuers of securities listed on official secondary markets.

D.3. Describe any transactions that are significant, either because of their amount or the subject matter, entered into between the company or entities within its group and directors or managers of the company:

Name or company name of the directors or executives	Name or company name of the company or group entity	Relationship	Nature of the transaction	Amount (thousands of euros)
No data				N.A.

See note 43 of the separate financial statements and note 46 of the consolidated financial statements for 2020 of Bankia, S.A. as a supplement to this section and notwithstanding the fact that they are not related-party transactions for the purposes of the provisions of Order EHA/3050/2004 of 15 September 2004, on related-party transactions to be disclosed in half-yearly reporting by issuers of securities listed on official secondary markets.

None of the members of the Board of Directors or other member of the senior management at the Bank, or any company at which these individuals are directors, members of senior management, significant shareholders or any parties related thereto, have carried out any transactions that were outside the Company's ordinary course of business, not performed on an arm's length basis or relevant to the Bank, as far as the Bank is aware, pursuant to Order EHA/3050/2004 of 15 September 2004, on related-party transactions to be disclosed in half-yearly reporting by issuers of securities listed on official secondary markets.

D.4. Report any material transactions carried out by the company with other entities belonging to the same group, provided that these are not eliminated in the consolidation process and do not form part of the company's ordinary business activities in terms of their purpose and conditions.

In any case, report any intragroup transaction conducted with entities established in countries or territories considered as tax havens:

Company name of the entity within the group	Brief description of the transaction	Amount (thousands of euros)
No data		N.A.

There have been no transactions with such characteristics.

D.5. Report any material transactions carried out by the company or entities belonging to its group with other related parties that have not been reported in the previous sections.

Company name of the related party	Brief description of the transaction	Amount (thousands of euros)
No data		N.A.

There have been no transactions with such characteristics.

D.6. List the mechanisms in place to detect, determine and resolve potential conflicts of interest between the company and/or its group and its directors, senior management or significant shareholders.

Article 32 of the Board of Directors Regulations regulates conflicts of interest that may affect directors, providing for an obligation on directors to notify the Board of Directors of any direct or indirect conflict they, or persons related to them, may have with the interests of the Bank. Also, per article 31 of the Board of Directors Regulations, directors must refrain from deliberating or voting on any resolutions or decisions in which they, or persons related to them, have a direct or indirect conflict of interest.

In addition, under the scope of the Internal Rules of Conduct in the Securities Markets (RIC), article 37 establishes the duties of covered persons and article 38 the general rules for managing conflicts. The mechanisms for detecting conflicts of interest are based fundamentally on the obligation to disclose any situation of conflict of covered persons to the Regulatory Compliance Department.

Moreover, the Bankia Group has a Code of Ethics and Conduct which must be complied with by all persons who have any type of professional relationship with the group. The purpose of the Code of Ethics is to establish ethical principles and general rules that shape the activities of the Group and the individuals subject to the Code, both within the Group and in dealings with clients, partners, suppliers and any individuals and public and private companies with which the Group has direct or indirect relations.

The Group has a Confidential Whistleblowing Channel, where the staff can report any breach of the Code of Ethics and Conduct, involving directors, employers or suppliers. The Ethics and Conduct Committee is ultimately responsible for resolving conflicts of interest and its decisions are binding.

To resolve possible conflicts of interest between BFA and other group companies, efforts have been made to promote best practices in good governance in respect of relations between BFA and Bankia, including the signing of a Framework Agreement in 2011, which was updated on 28 February 2014. The objectives of this agreement are (i) to establish relations between both entities and between their respective group companies and ensure an adequate level of coordination, thereby minimizing and regulating each company's areas of activity - at arm's length - and any potential conflicts of interest that could arise in the future, (ii) to regulate the procedure to be followed should the members of Bankia's Board of Directors find themselves in a situation that conflicts directly or indirectly with the interests of BFA, establishing the obligation to declare this situation of conflict and refrain from taking part in the deliberation and discussion on the relevant decisions, and (iii) to regulate information flows between Bankia and BFA to ensure both parties comply with their statutory, accounting, tax and reporting obligations. In the event that a director is a member of the Boards of both BFA and Bankia, they must refrain from being involved in the matters set forth in the Framework Agreement.

Regarding related-party transactions, the Framework Agreement establishes that such transactions will be governed by the principles of transparency and the provision thereof on reasonable and equitable market terms, preferred treatment, diligence and confidentiality. Bankia's Audit and Compliance Committee will formally issue its opinion, by means of a report to the Company's Board of Directors, on whether the related-party transactions are at arm's length. Following a favourable report from the Audit and Compliance Committee, the Board of Directors will approve all related-party transactions. Section 6.6 of the aforementioned Framework Agreement establishes the requirements to be met in the event that Bankia grants financing to BFA.

In addition, on 17 December 2015, the Board of Directors approved the Conflicts of Interest Policy of Bankia, S.A., which sets forth the procedures for preventing conflicts of interests.

The Conflicts of Interest Policy was updated by the Board of Directors on 24 April 2020. In line with said Policy, a conflict of interest is understood to exist when there is a direct or indirect contradiction, clash and/or incompatibility between the corporate interests of Bankia or any other Group company and the interests of its (i) directors, (ii) senior management, (iii) shareholders, (iv) employees, (v) suppliers and (vi) customers; as well as any third parties related directly or indirectly thereto; or between customers.

D.7. Indicate whether the company is controlled by another entity in the meaning of Article 42 of the Commercial Code, whether listed or not, and whether it has, directly or through any of its subsidiaries, business relationships with said entity or any of its subsidiaries (other than the listed company) or carries out activities related to those of any of them.

[☒] YES
[☐] NO

Indicate whether the respective areas of activity and any business relationships between the listed company or its subsidiaries and the parent company or its subsidiaries have been defined publicly and precisely:

[☒] YES
[☐] NO

Report the respective areas of activity and any business relationships between the listed company or its subsidiaries and the parent company or its subsidiaries, and identify where these aspects have been publicly reported

As noted in Section A of this Report, BFA Tenedora de Acciones S.A.U. held shares representing 61.829 % of Bankia's share capital at 31 December 2020.

In general terms, Bankia materially performs and provides to BFA the activities and services specific to the Deputy General Directorate of the General Secretariat, the General Directorate of People, Resources and Technology, the Deputy General Directorate of Communication and External Relations, the groups reporting to the Chief Executive Officer and, in general, any other general management and administration services as may be agreed on by BFA in the future.

On 28 February 2014, the two entities entered into the Framework Agreement governing the relations between BFA and Bankia, with a view to defining the mechanisms necessary, within the legal limits, to (i) ensure an appropriate level of coordination between Bankia and BFA and the Group companies at all times, and (ii) to manage and minimize any situations that may give rise to potential conflicts of interest between the BFA and Bankia (in particular, within the context of related-party transactions), while ensuring due respect for and protection of the interests of the BFA and Bankia shareholders, in an atmosphere of transparency in dealings between the two entities.

The Framework Agreement is available on the corporate website (www.bankia.com).

The Framework Agreement may be implemented in the form of the relevant service level agreements and, for such purpose, the two entities executed a Service Level Agreement 2011, subsequently replaced by another Agreement dated 31 October 2014. The above Agreement seeks to identify and regulate the services and activities to be materially provided and performed by Bankia in favour of BFA (concerning the activities and services specific to the Deputy General Directorate of the General Secretariat, the General Directorate of People, Resources and Technology, the Deputy General Directorate of Communication and External Relations, the groups reporting to the Chief Executive Officer and, in general, any other general management and administration services as may be agreed on by BFA in the future.) Moreover, it aims to set out the general criteria for the provision of services between related parties on reasonable and equitable market terms, and to determine the mechanisms to ensure the proper flow of information between the parties in order to meet their management needs and obligations with the relevant regulators.

Meanwhile, on 24 January 2019, following a favourable report from the Audit and Compliance Committee, the Company's Board of Directors approved the signing of an agreement on the management of the FROB's indirect interest in Bankia, via BFA Tenedora de Acciones, S.A.U., executed on 25 January 2019. This agreement aims to specify the terms governing the relationship between Bankia, BFA and the FROB for the management by the FROB of its stake in Bankia, via BFA, whereby such management seeks to recover the subsidies granted to Bankia, ensuring the most efficient possible use of public funds and seeking to safeguard the stability of the financial system, in line with the applicable legislation on the resolution of credit institutions.

Identify the mechanisms in place to resolve potential conflicts of interest between the parent of the listed company and the other group companies:

Mechanisms for resolving possible conflicts of interest

In line with the provisions of the Framework Agreement and during such time as it remains in force, Bankia's Board members must avoid any potential direct or indirect conflicts of interest with the interests of BFA, serving notice on the Board of Directors, which, where such conflicts prove inevitable, will take the relevant action. In the event of conflict, the director affected must leave the meeting room, refraining from intervening in the Board's deliberations and decisions on the matter to which the conflict refers.

In any event, the proprietary directors representing BFA must leave the meeting room, refraining from the deliberations and decisions to be adopted by the Board of Directors in line with the Framework Agreement on the subject of related-party transactions and conflicts of interest.

In the event that a director is a member of the Boards of both entities, they must, needless to say, refrain from intervening in the matters set forth in the Framework Agreement.

E. RISK MANAGEMENT AND CONTROL SYSTEMS

E.1. Explain the scope of the company's Risk Management and Control System, including tax risk.

Risk management is a strategic pillar of the organisation. The primary objective of risk management is to safeguard the Group's financial stability and asset base, while creating value and developing the business in accordance with the risk tolerance and appetite levels set by the governing bodies. For this purpose, it provides the tools to enable the valuation, control and monitoring of the different risks to which the Group is exposed. The Group's risk strategy is implemented with the aim of guaranteeing stable and recurring earnings, with an overall medium-low risk profile. The key pillars of this strategy are:

1. An efficient internal control framework based on a three lines of defence model governed by the following general principles including its scope, covering all types of relevant risks for the Group as a whole, independence of the risk function and the commitment of senior executives, adapting behaviour to the highest ethical standards and strict compliance with laws and regulations:
2. Efficient risk governance.
3. An organisational model that is consistent with the general principles of the function and has a transparent organisational structure in which functions and responsibilities are clearly assigned, encompassing senior executives right down to the lower levels of the Entity, with a responsible management team and an active internal control system, in which the Board of Directors is the body responsible for determining the risk control and management policies, as well as supervising the effectiveness of internal control.

Accordingly, the Group's risk management and control model is based on the three lines of defence approach, the main functions and responsibilities of which are:

- The first line of defence comprises the risk management directorates, owners of the risk processes and those responsible for carrying out the controls established in the first line of defence. Specifically, it comprises both the business units and any of the Entity's units that assume risks. These Directorates will perform their activities in compliance with the Group's risk profile, based on the risk appetite and approved policies.

In order to carry out its function of managing the risks on a daily basis within the scope of its activity and responsibility, the first line of defence avails of the means to identify, measure, address and report the assumed risks, applying adequate control and reporting procedures based on the Internal Control Framework in place and the procedures for monitoring the risk limits approved in the Risk Appetite Framework and the Group's policies.

- The second line of defence comprises the Directorates that oversee the risks and define the controls mitigating them, and is composed of the Corporate Risk Directorate and the Corporate Directorate of Regulatory Compliance.

In April 2015, the Board of Directors appointed the Group's Chief Risk Officer ("CRO"), setting the conditions necessary for performance of the function, the main responsibilities, and the rules and powers for appointment and removal. The status reinforces the independence of the Chief Risk Officer, who must maintain constant functional reporting with the Risk Advisory Committee and its Chairman. The CRO also has regular, direct two-way access to senior executives and the governing bodies. Under its management, the main activity of the Corporate Risk Directorate is to carry out the monitoring, control and supervision of all the Group's risks, from a global and forward-looking perspective and, to this end, to maintain a permanent dialogue with the Board of Directors, through the Risk Advisory Committee.

The Corporate Directorate of Regulatory Compliance is responsible for identifying and assessing the risk of non-compliance, by verifying compliance with internal policies and procedures and by exercising adequate controls and coordinating the preparation and implementation of action plans focused on mitigating the risk of non-compliance, reporting the results of

this activity to senior executives. It is also responsible for maintaining dialogue with the regulatory and supervisory bodies.

- The third line of defence comprises the Corporate Directorate of Internal Audit. Internal Audit is an independent and objective assurance and consultation function, created to add value to and enhance the Group's operations. Its mission is to improve and safeguard the value of Bankia and its Group, providing objective assurance, advice and risk-based knowledge, helping the Group to meet its objectives by providing a systematic and disciplined approach towards assessing and enhancing the efficiency of the governance, risk management and control processes.

(CONTINUED IN SECTION H)

E.2. Identify the bodies within the company responsible for preparing and executing the Risk Management and Control System, including tax risk.

On 26 June 2013, the European Council approved a regulation which, from 1 January 2014, made application of the capital agreements known as BASEL III effective for the entire European Union. This regulation takes the form of a Capital Requirements Directive and a Capital Requirements Regulation, known as CRD IV and CRR, respectively.

One of the main features of this legislation when compared to previous regulations is the introduction of Corporate Governance as a core element of risk management. In this regard, Bankia fits completely with the spirit of the new regulation, with its governing bodies assuming responsibility for the oversight and control of risks:

- The Board of Directors is the highest governing body. It determines and approves the general internal control strategies and procedures, as well as the policies for assuming, managing, controlling and reducing the risks to which the Group is exposed. It has several internal committees, which are attributed different risk control and monitoring responsibilities.

- The basic responsibilities of the Audit and Compliance Committee include overseeing the efficiency of the internal control of the entity, the internal audit, where appropriate, and the risk management systems. Specifically, it is responsible for regularly reviewing internal control and risk management systems in order to properly identify, manage and report the main risks.

- Risk Advisory Committee. Article 38 of the Law on the Regulation, Supervision and Solvency of Credit Institutions (LOSSEC) establishes the need to create a Risk Committee whose members do not have executive duties. Therefore, in 2014, the Board Risk Committee was relieved of functions not related to authorisation of transactions (non-executive). These have been transferred to the new Risk Advisory Committee, whose functions include both those transferred from the Board Risk Committee and those envisaged in Royal Decree 84/2015, implementing the LOSSEC. The Risk Advisory Committee is currently the body responsible for overall risk management, taking the related decisions in accordance with the powers delegated to it and tasked with establishing and supervising compliance with the control mechanisms for the various types of risk, without prejudice to the supervisory authority legally corresponding to the Audit and Compliance Committee.

- The Board Risk Committee, with executive power and authority to approve the most significant transactions, may establish, as authorised by the Board of Directors, the overall limits in order for lower-ranking bodies to approve other transactions. Credit risk, the risk approval structure and any risks that, due to their amount, are reserved for the Board Risk Committee, are determined by the existing risk segments at any given time and the levels classified in accordance with their credit rating ("rating" or "scoring") based on models endorsed by the supervisor.

The organisational model described is rounded out by a number of committees, including:

a) Management Committee. This committee is presented with the documentation analysed at previous meetings of the organisation's various units. Under the scope of the Risk Appetite Framework, this committee is in charge of proposing the pertinent measures when limits are approached.

b) Capital Committee. Among this committee's responsibilities are the monitoring of the regulatory framework and its potential impact on the Group's regulatory capital, and the monitoring and analysis of the main capital ratios and their components, as well as the leverage ratio. It also monitors any capital initiatives carried out within the Group and the changes in RWAs.

c) Assets and Liabilities Committee. This committee is in charge of monitoring and managing structural balance sheet and liquidity risks, reviewing the balance sheet structure, business performance and market performance, as well as the financial scenario, product profitability, earnings, etc. bearing in mind the policies and authorities approved by the Board of Directors. This committee must also decide on investment and hedging strategies that enable risks to remain within the approved limits, and also the budget for the year.

d) Risk Committee. This committee oversees the operations under its remit and performs a preliminary analysis and assessment of all credit risk which must be resolved by high-ranking levels (Board of Directors and the Board Risk Committee). It is also in charge of designing a risk authorisation system and interpreting regulations to improve operations in accordance with general criteria approved by the Board of Directors.

e) Provisioning Committee. Its responsibility is to ensure compliance with prevailing standards for recognising impairments for credit risk, approve the framework of risk classification policies, criteria and approaches and allowances under the general framework of policies established by the Board of Directors.

f) Models Committee. The main function of this committee is to provide the Board of Directors with a proposal for approving the new models and expanding/modifying already existing models, as well as to provide a proposal for approving the model implementation plan.

(CONTINUED IN SECTION H)

Indicate the main risks, including tax risks, and those deriving from corruption (with the scope of these risks as set out in Royal Decree Law 18/2017), to the extent that these are significant, which may affect the achievement of business objectives.

Using the conventional classification of risks generally used in the financial sector, Bankia analyses, measures and manages the following risks:

Credit risk

Understood as the risk of loss arising from the failure of a counterparty to meet its contractual obligations. This is the Entity's main risk.

Loans and advances to customers are in line with the last year in terms of the breakdown between the wholesale segment (38%, including the public sector) and the retail segment (62%).

Personal mortgages account for 53% of gross lending.

The credit risk affecting the total loan investment in the property development portfolio is 0.5% and is highly provisioned.

Market risk

Market risk is the risk of loss caused by adverse fluctuations in prices of the financial instruments in which the Entity operates. Another risk related to market risk is the market liquidity risk.

Activity in financial markets also exposes the Entity to market liquidity risk, which arises from difficulties closing or covering positions due to an absence of counterparties in the market, causing the price to be adversely affected in the event of sale.

Structural interest rate risk

Structural interest rate risk relates to potential losses in the event of adverse trends in market interest rates. Interest rate fluctuations affect both net interest income and equity. The intensity of the impact depends to a large extent on the different schedule of maturities and the repricing of assets, liabilities and off-balance sheet transactions.

Liquidity and financing risk

Structural liquidity risk is defined as uncertainty, in adverse conditions, regarding the availability of reasonably priced funds that allow for punctual compliance with commitments undertaken by the entity and for the financing of investing activity growth. The entity has a broad range of metrics for managing and controlling this risk. In addition to the various metrics, the entity has a clearly established Contingency Plan, which identifies the alarm mechanisms and the procedures to follow in the event said plan is activated.

Operational risk

Operational risk is the risk of loss due to inadequate or failed internal processes, people and systems or from external events. This definition includes legal risk, but not reputational risk.

IT and cybersecurity risk

A business risk arising from the use, ownership, operation, participation in and influence and adoption of IT systems at the organisation. Within IT risk, cybersecurity risk is the risk of breaches of the confidentiality, integrity or availability of the organisation's data and IT systems.

Reputational risk

Reputational risk is expressed as the probability of incurring losses due to the occurrence of any event that fails to meet stakeholder expectations to the point that this undermines the level of recognition obtained or prevents the desired level from being reached, resulting in an adverse attitude and/or behaviour that could have a negative impact on the business.

The Entity's approach includes mechanisms to assess, measure and manage new risks, enabling the Entity to respond quickly and efficiently to adverse situations that could pose reputational risk and result in financial losses. In this respect, the new corporate risk culture has led to a more demanding and rigorous risk management model embedded in the Entity's strategy and organisation that ensures comprehensive treatment of risks.

Tax risk

In view of the possibility of sustaining a higher-than-expected tax impact on transactions, the reform to the Spanish Companies Act included a series of measures designed to improve corporate governance, such as Tax Risk Management (TRM). Listed companies are obliged to manage tax risk appropriately and the Board of Directors of such companies is ultimately responsible in this respect.

E.4. Indicate whether the entity has risk tolerance levels, including for tax risk.

The entity has a Risk Appetite Framework approved by the Board of Directors.

Risk appetite is understood as the amount and type of risk the Entity is willing to assume in its activity in order to meet its objectives, complying with regulatory restrictions and the commitments undertaken. The Risk Appetite Framework establishes a set of elements that provide a complete view of the levels of appetite, tolerance and capacity for each of the risks and the comparison between same and the Entity's risk profile.

Furthermore, the Board of Directors approved the Capital Planning Framework which, together with the Risk Appetite Framework, sets out the Entity's strategic lines of action with respect to risk and capital in normal business circumstances. Both processes shape the planning of the Entity's activities and businesses.

The Recovery Plan (also approved and effective since February 2015) establishes the potential measures to be adopted in a hypothetical crisis situation. The measures would be triggered if the predefined level of any of the selected indicators in the plan were exceeded. They are consistent with those determined by the tolerance levels in the RAF.

Thus, the Board of Directors approved the necessary changes to the Risk Appetite statement, developing the relationship between the RAF and the Strategic Plan, Business Model, Capital Planning, Recovery Plan and Budget, bringing the indicators into line with the various requirements of the supervisory authorities and the risk control and monitoring needs.

E.5. Indicate which risks, including tax risks, have materialised during the year.

The Bankia Group reduced doubtful exposures by EUR 142 million, closing 2020 with a balance of EUR 5,721 million.

The decrease in the doubtful portfolio led to a reduction in the NPL ratio for loans and receivables to 4.70%.

Also worth noting is the breakdown of doubtful assets. At the close of 2020, 36% of assets were classified in the doubtful category based on subjective criteria or are in the "curing" period. Accordingly, no loans in this portfolio are past-due entailing objective default, nor have any refinancing agreements been reached with customers and, therefore, there is an apparent willingness to pay. This must be verified over a period of at least six months, but can be extended to the entire grace period where applicable.

Counterparty risk

To mitigate the risk of trading in derivatives with financial and non-financial institutions, Bankia has entered into CMOF or ISDA framework contracts, which enable it to net negative and positive positions of the same counterparty. At 31 December 2020, there were 2,040 netting agreements. In addition, Bankia has collateral agreements (Appendix III of CMOF and CSA) to mitigate exposure of collateralisation to the market value of positions with the contribution of cash or bonds. There are currently 234 collateral agreements signed (121 derivatives, 75 repos and 38 securities loans). These agreements reduced the credit risk of the derivatives activity by 92.66%.

The valuation adjustment as at 31 December 2020 was EUR 56,373 million.

Market risk

Bankia's average VaR in 2020 was EUR 1.48 million, with a maximum of EUR 2.87 million and a minimum of EUR 0.76 million.

Interest rate VaR (EUR 0.66 million, including volatility) accounted for the largest share of average VaR, followed by credit spread VaR (EUR 0.47 million).

Structural interest rate risk

Low interest rates have had an adverse impact on the entity's net worth and its financial margin in line with similar entities. The entity has in place policies and a framework concerning limits that enable it to measure and control the interest rate risk and maintain risk levels consistent with prudent management.

Liquidity and financing risk

The average liquidity and funding position by volume of liquid assets and status of regulatory ratios remained strong throughout the year and compatible with a low risk profile.

Operational risk

The operational risks materializing in 2020 amount to EUR 48.7 million. The most important operational risks relate to "client practices, products and businesses" (EUR 17.9 million), "execution, delivery and process management" (EUR 16.4 million) and "external fraud" (EUR 7.6 million). These data do not include non-recurring losses relating to past behavioural risks (Annulled Shares, Preference Shares, Floor Clauses, Formalisation Expenses, etc.) with legal proceedings that are still in progress and are exceptional in nature.

Losses from operational events include penalties, interest or surcharges arising from tax-related proceedings against the Bank.

E.6. Explain the response and oversight plans for the company's main risks, including tax risks, as well as the procedures followed by the company in order to ensure that the Board of Directors responds to any new challenges that arise

The entity operates a Risk Appetite Framework that sets the desired and maximum levels of risk that the Group is willing to accept. The Risk Appetite Framework is approved annually by the Board of Directors, while the Risk Advisory Committee is responsible for advising the Board on the Company's current and future overall risk appetite and strategy. With advice from the Risk Advisory Committee, the Board also approves policies for the various risks to which the Entity is exposed. The Risk Appetite Framework and the Policies are reviewed annually to update the desired and maximum levels of risk indicators, add any further suitable tracking metrics and cover any new relevant aspects required by regulations or new risk trends and challenges.

Credit Risk. Credit risk is managed within the limits and guidelines established in the credit risk policy. It is supported by a set of tools that can be classified according to their functionality into the following categories:

- Risk classification.
- Risk quantification.
- Risk projection.
- Risk-adjusted return (RAR).
- Business revitalisation.
- Recovery management.
- Concentration risk management.

Counterparty risk. The following overall limits are established to control Counterparty Risk:

Overall Risk Limit (risk ceiling from all of Bankia's operations with financial institutions), Foreign Trade Framework (ceiling associated with foreign trade) Fixed-income Underwriting Framework (covers underwriting for different issuers assuming final assumption of zero), Limit on Trading in Government Debt (ceiling on all Bankia's trading with an issuer that is a state-owned entity), Limit on Trading in Fixed Income (fixed-income transactions with private issuers for the trading portfolio) Alco Portfolio Limit (structural portfolio allowing for fixed-income investment), and Derivatives Lines for Non-Financial Institutions (individual limits per counterparty).

To mitigate counterparty risk, the Entity performs a daily analysis of exposures to counterparties in order to assess cumulative risk and control potential excesses, periodically reconciling the derivative portfolios of each counterparty and calculating daily the margins to be exchanged with counterparties that have a collateral agreement signed. In addition, it calculates, on a daily basis, the credit value adjustment (CVA), which measures the adjustment to be made to the value of derivatives assuming that they are risk-free to obtain a value adjusted for the risk of counterparty default.

Market risk. Market risk is controlled through the establishment of limits based on VaR, calculated using the historical simulation method, sensitivity, maximum loss and size of the position. These limits are established according to the maximum exposure approved annually by senior management and notified to the different areas and business centres.

The main tools used to measure and control market risk are, on the one hand, VaR with a 1-day time horizon and a 99% confidence level and, on the other, sensitivity. The main movements in market factors used in sensitivity analysis are interest rates, equity prices, exchange rates, volatility and credit spreads.

Structural interest rate risk. The Entity has a structural risk management policies and procedures framework under which it monitors regulatory and other, stricter internal limits. Based on this, it controls and monitors the sensitivity of the interest margin and the value of its assets and liabilities by simulating different interest-rate scenarios to complement regulatory scenarios. The measurement scheme covers the entire balance sheet (focusing on the impact of changes in interest rates on profit or loss) and on portfolios of held-to-maturity financial assets (mainly fixed income).

Liquidity and financing risk

To monitor this risk, the Entity has management policies and procedures in place that enable it to identify, measure, monitor and control the risks inherent in the management of liquidity and financing. The analysis includes different approaches, the liquidity gap in accordance with maturity and the financial structure, including the current/non-current ratio, as well as the calculation of different liquidity coverage ratios, underpinned by the regulatory liquidity ratio, based on different assumptions.

In addition, the Entity has a clear Liquidity Contingency Plan, identifying the alert mechanism and procedures to be observed where necessary.

(CONTINUED IN SECTION H)

F. INTERNAL RISK MANAGEMENT AND CONTROL SYSTEMS RELATING TO THE PROCESS OF PUBLISHING FINANCIAL INFORMATION (ICFR)

Describe the mechanisms forming your company's Internal Control over Financial Reporting (ICFR) system. **F.1. The entity's control environment**

Report on at least the following, describing their principal features:

F.1.1. The bodies and/or departments that are responsible for: (i) the existence and maintenance of an adequate and effective ICFR system; (ii) its implementation; and (iii) its supervision.

Article 4 of the Entity's Board of Directors Regulations expressly states that the Board must provide the markets with prompt, accurate and reliable information ("particularly on ownership structure, substantial amendments to governance rules, trading in treasury shares and particularly significant related-party transactions"), and approve the financial reporting the Company must publish regularly.

In addition, article 36.2 of the Board of Directors Regulations stipulates that "The Board will adopt the measures necessary to guarantee that quarterly, semi-annual and any other financial information that is disclosed to the markets is prepared in accordance with the same professional practices, principles and policies as the annual financial statements and is equally reliable."

Meanwhile, the Audit and Compliance Committee's responsibilities include, inter alia, supervising the preparation and filing of regulatory financial information and, in particular, reviewing the Company's accounts.

The Board of Directors has delegated responsibility for overseeing the proper functioning of the ICFR to the Audit and Compliance Committee .

With respect to the above risk management and control oversight duties, the Audit and Compliance Committee has regard to the criteria of the supervisory authorities regarding anti-corruption and other irregular practices and the identification, management and control of the potential related impacts, acting with the utmost rigour.

Senior Management is responsible for designing and implementing the ICFR through the Deputy General Directorate of Finance, taking the steps required to ensure that it operates correctly, as well as through the other departments involved, which must cooperate with the Deputy General Directorate of Finance.

The Group has an Internal Control over Financial Reporting Policy (the "ICFR Policy"), approved by the Board of Directors, which describes the tools and internal risk management and control systems related to the process of publishing financial information and the related oversight.

F.1.2 Indicate whether the following exist, especially in relation to the drawing up of financial information:

- Departments and/or mechanisms in charge of: (i) the design and review of the organisational structure; (ii) clear definition of lines of responsibility and authority with an appropriate distribution of tasks and functions; and (iii) ensuring that adequate procedures exist for their proper dissemination throughout the entity.

The Organisation Department is responsible for defining, proposing for adoption and implementing, in accordance with the established regulatory requirements, strategic guidelines and policies, the structure, scale and functions of the Bank's different organisational groupings, as well as the operational procedures and circuits regulating the performance of these functions, in order to achieve the most efficient distribution possible of functions and resources.

It is also responsible for defining and making any changes to the functions attributed to the Bank's groupings, upholding the principles of segregation of duties and organisational efficiency, as well as preparing and keeping up to date the

Bank's Operations Manual and publishing the organisational chart on the intranet, together with the Process Map, which provides an overall, high-level view of the Bank's key processes. Specifically, the latter provides information on the activities carried out, the parties involved and the systems and tools used in the various processes.

Such updates are duly approved by the relevant party in accordance with the system of HR and organisation-related delegated responsibilities and authorities in place and duly communicated to the organization.

Code of conduct, the body approving this, degree of dissemination and instruction, principles and values covered (stating whether there is specific mention of record keeping and preparation of financial information), body charged with analysing breaches and proposing corrective actions and sanctions.

The Bankia group has a Code of Ethics and Conduct, approved by the Board of Directors, constituting one of the essential pillars of its System of Corporate Governance in order to create a corporate culture and encourage conduct based on its corporate values: integrity, professionalism, commitment, proximity and focus on achievement.

The Code of Ethics and Conduct is a mandatory regulation that seeks to regulate the types of conduct permitted and prohibited by the Entity and set out the ethical principles and general rules guiding the actions of the Group and the people included within the relevant scope of application. The Code of Ethics and Conduct governs relationships both within the Company and with customers, suppliers, shareholders and any other parties that have dealings with Bankia. It sets the standards that must guide their conduct in their daily work and in their decision making. It sets forth the rules and guidelines of professional conduct applicable to all of the Entity's employees and directors and all of the Bankia Group's businesses and activities. With respect to the recognition of transactions and the preparation of financial information, the Code of Ethics and Conduct refers to a commitment to compliance with the entity's policies, procedures and controls in order to meet international requirements and good practices. Moreover, Principles 3 and 4 (Protection of Bankia's Assets and Information Security) notes that information must be used solely for the pursuit of professional activities, observing suitable measures to safeguard the company's information.

Bankia's Board of Directors and governing bodies are responsible for ensuring all activities focus on this goal, dealing with potential breaches and, if needed, taking corrective measures as and when required through the competent bodies.

All people to whom the Code of Ethics and Conduct applies have received a copy. It has also been published on the corporate intranet and on the Company's website. In addition, a specific training programme has been set up for all professionals of the Entity. The objectives of this programme include teaching such professionals how to apply the Code of Ethics and Conduct correctly and report any conduct that breaches the Code by using the Confidential Whistleblowing Channel. Alongside the Code of Ethics and Conduct, there are the Internal Rules of Conduct for Securities Markets, with which employees must be familiar and comply in line with the prevailing securities market legislation, and which is signed by company employees on joining.

Bankia has an Ethics and Conduct Committee, whose functions are determined by the Board of Directors, including: adopting the measures necessary to handle ethically questionable conduct; overseeing compliance with the Code of Ethics and Conduct; and performing annual assessments of the degree of compliance with the Code and drafting reports for Senior Management.

Whistleblower channel allowing notifications to the audit committee of irregularities of a financial and accounting nature, in addition to potential breaches of the code of conduct and unlawful activities undertaken in the organisation, indicating whether this channel is confidential:

The Bankia Group has a Confidential Whistleblowing Channel, provided for in the Code of Ethics and Conduct, which all of the Group's employees and suppliers may use to file a confidential and anonymous (where so requested) written report on any possible financial or accounting irregularities that may potentially be relevant, or on any other conduct breaching the Code of Ethics and Conduct detected at any Bankia Group company.

The regulations governing the above Channel have been approved by the Audit and Compliance Committee, setting out the mechanisms for receiving, filtering, classifying and handling reports submitted, all in accordance with the criteria issued by the Spanish Data Protection Agency in this respect, and guaranteeing confidentiality, managed as it is by an external firm with broad experience in the field, which refers any complaints, queries or suggestions to the Ethics and Conduct Committee.

Both the Code of Ethics and Conduct and the Whistleblowing Channel are core elements of the crime prevention and detection model.

The Committee on Ethics and Conduct provides the Audit and Compliance Committee with an activity report at the end of each period, and regularly reports on the functioning of the Whistleblowing channel, in particular on the number of reports received, their origin and type, the results of the inquiries and the proposed actions.

- Training and periodic refresher programmes for personnel involved in the preparation and revision of financial information, as well as in the assessment of the ICFR system, covering at least accounting standards, auditing, internal control and risk management.

Bankia has established mechanisms to ensure that the individuals directly involved in collating financial information and preparing and reviewing financial reporting have the professional skills and competence to perform such duties. In this respect, these individuals are continuously updated on the prevailing legal requirements

Bankia's Personnel Strategy and Policy Department oversees the Group's training activities and programmes, and keeps an up-to-date record of all training courses delivered and the content thereof. Specifically, regular training and refresher courses are provided to personnel involved in the ICFR and its oversight, covering, at least, accounting standards, auditing, internal control and risk management.

The Internal Control System for Financial Information Policy is available to all employees on the corporate intranet, as is a specific online learning module on the ICFR, which was completed by 24 employees in 2020, joining the 22 in 2019 and the 188 employees trained between 2014 and 2017.

The aim of the course is to strengthen the culture of internal control at the organisation, based on the principles and good practices recommended by the CNMV, broken down into three sections:

-Establishing the (domestic and international) legislative framework applicable to ICFR.

-Introduction to internal control within an organisation and further details on the Internal Control System in place at the Bank, ensuring any persons directly or indirectly involved in the process of preparing financial information are aware of the importance of identifying and implementing instruments and mechanisms to help ensure it is reliable. Methodology in place at Bankia, reminder of the obligations and responsibilities of the parties involved in ICFR, ICFR self-assessment and certification processes, and an explanation of how to search the application used (queries on risks and controls, access to documentation, self-assessments and certifications, etc.).

As well as induction training, further training may be provided during the year to attend to specific needs arising as a result of legislative/regulatory changes or in response to specific requests from the organisation's different departments.

In this respect, the Deputy General Directorate of Finance is in charge of awareness-raising and updating, ensuring that the staff involved in ICFR have the necessary knowledge to perform their duties and responsibilities. Such actions concern any additions or changes to the persons in charge of ICFR, and the identification of any changes to processes, risks or controls arising both internally and externally.

F.2. Assessment of risks in financial reporting

Report on at least the following:

F.2.1 The main characteristics of the risk identification process, including risks of error and fraud, as regards:

- Whether the process exists and is documented.

Bankia has developed a procedure to identify material areas, relevant processes and potential risk events (including the risk of errors and fraud) that may significantly affect the Group's financial information.

This process is documented, setting out the frequency, methodology, types of risks, controls performed, and the frequency and supervisors of such controls, and the Deputy General Directorate of Finance is responsible for designing, implementing, maintaining and periodically updating said process, to this end drawing on the collaboration of the rest of the departments involved in the ICFR.

- Whether the process covers all the objectives of financial reporting, (existence and occurrence; completeness; valuation; presentation; disclosure and comparability; and rights and obligations), whether it is updated and if so how often:

This procedure, which has been designed with regard to all financial reporting objectives (existence and occurrence, integrity, valuation, presentation, breakdown and comparability, rights and obligations), is updated once a year, using the latest financial information, as well as wherever any previously unidentified circumstances arise that indicate the risk of significant errors in the regulated financial information, or where there are any material changes in operations that may uncover new material risks, calling for implementation of the pertinent mitigating controls.

- The existence of a process for identifying the scope of consolidation, taking into account, among other factors, the possible existence of complex corporate structures or special purpose vehicles.

The Company has in place a monthly procedure for updating and verifying the consolidation perimeter performed by the Deputy General Directorate of Finance. This procedure is based on the Group's consolidation tool and enables Bankia to ensure any variations in the scope of consolidation in the different reporting periods are correctly included in the Group's consolidated financial statements. The Group's consolidation perimeter is reported on the corporate intranet every month.

The Board of Directors Regulations also authorise the Board to approve resolutions concerning the creation or acquisition of shares in special purpose vehicles or entities resident in countries or territories considered tax havens, and any other transactions or operations of a comparable nature whose complexity might prove detrimental to the transparency of the Company and the Group.

- Whether the process takes into account the effects of other types of risk (operational, technological, financial, legal, tax, reputational, environmental, etc.) to the extent that they affect the financial statements.

The risk identification process takes account of the impact of other types of risks (e.g. operational, technological, financial, legal, tax, reputational, environmental, etc.) to the extent that these could affect the Bank's financial reporting. The Contoller's Department stages working meetings with other groups at the Bank in order to gather information on and understand other types of non-financial risks that may affect the Bankia Group's financial statements.

- The governing body within the company that supervises the process:

The Audit and Compliance Committee's duties include supervising the effectiveness of internal control and, specifically, periodically reviewing the internal control and risk management systems, so that the principal risks are identified, managed and appropriately disclosed.

F.3. Control activities

Report on whether the company has at least the following, describing their main characteristics:

F.3.1 Review and authorisation procedures for financial information and a description of the ICFR, to be disclosed to the securities markets, indicating those responsible, as well as documentation describing the flow of activity and controls (including those relating to the risk of fraud) of the various types of transactions which may materially affect the financial statements, including accounting closing procedures and the specific review of significant judgements, estimates, valuations and projections.

As stated in section F.1.1, the Board of Directors has delegated the authority to oversee the correct functioning of the ICFR to the Audit and Compliance Committee.

The powers conferred on the above Committee are as follows:

1. Overseeing the effectiveness of internal control at the Company, seeking to ensure that the internal control policies and systems in place are effectively applied in practice, internal audit, regulatory compliance, the systems in place to manage and control financial and non-financial risk at the Company and, as the case may be, the Group, and discussing with the statutory auditor any material weaknesses in the internal control system that may have been detected in the audit, without jeopardizing its independence. To this end, where appropriate the Committee may make recommendations or submit proposals to the Board of Directors, including regarding the related follow-up period. With regard to information systems and internal control:

-Verifying the appropriateness and integrity of internal control systems and reviewing the appointment and replacement of those responsible for them.

-Reviewing and supervising the preparation and integrity of the financial information regarding the Company and, where appropriate, the Group, reviewing compliance with regulatory requirements, the appropriate definition of the consolidation perimeter and the proper application of accounting principles.

-Supervising and periodically evaluating the internal control and financial and non-financial risk management and control systems concerning the Company and, where applicable, the Group, including operational, technological, legal, social, environmental, political and reputational risk, or risk related to corruption, to ensure that the key risks are identified, managed and duly reported, regardless of the powers entrusted to the Risk Advisory Committee or other risk supervision committees.

-Establishing and supervising a mechanism that allows employees and other persons related to the Company, such as directors, shareholders, suppliers, contractors or subcontractors, to report (confidentially and, in certain cases, anonymously) any potentially serious irregularities, especially those of a financial or accounting nature, that they observe in the Company or its Group. Moreover, it will foster compliance with the Code of Ethics and Conduct approved by the company, overseeing the functioning of the Ethics and Conduct Committee within the scope of its powers, which will provide the Audit and Compliance Committee with an activity report at the end of each period.

-Establishing and supervising a system for preventing and detecting crimes that may result in criminal liability for the Company.

2. Supervising the preparation and filing of regulatory financial and non-financial information and submitting to the Board of Directors recommendations or proposals designed to safeguard the integrity of such information and, in particular:

-Reporting to the Board of Directors, in advance, on the financial and related non-financial information that the Company must publish periodically.

-Reviewing the Company's accounts to ensure compliance with legal requirements and proper application of accounting legislation and reporting on any proposals for changes to accounting standards and principles put forward by management.

In the interests of effective supervision, the committee must hold individual meetings with management and internal audit and maintain fluid communication with the statutory auditor for the purpose of analysing the following matters: the appropriateness of the scope of consolidation; any judgements, criteria, valuations or estimates that have a material impact on the financial statements and related non-financial reports; any changes in the significant criteria applied; where applicable, the reasons why in its public reports the Company uses certain performance measures instead of the measures defined directly by the accounting standards, the extent to which such measures provide useful information to investors and the extent to which the Company complies with international recommendations and best practice in this regard; any material weaknesses in internal control, any material adjustments identified by the statutory auditor or resulting from reviews performed by internal audit, and management's position on such adjustments, taking into account any demands sent in the current or a previous period by the Comisión Nacional del Mercado de Valores (CNMV), in order to ensure that the same incidents identified in those demands are not repeated in future financial statements.

-Reviewing issue prospectuses and any periodic financial information the Board is required to provide to the markets and market supervisory bodies.

The Deputy General Directorate of Finance's duties include, inter alia, overseeing accounting and tax management, and the preparation of the Bank's periodic financial statements, as well as the financial information disclosed to the markets and regulatory bodies.

Meanwhile, the Controller's Department is in charge of designing, implementing, ensuring, regularly updating and managing the ICFR, with the collaboration of the rest of the departments involved.

Responsibility for regulated financial information published within the time limits required by the regulations lies with the Deputy General Directorate of Finance:

-The preparation of regulatory half-yearly and annual financial information is the responsibility of the Controller's Department.

The preparation of quarterly financial information, as well as the Management report included in the regulated semi-annual and annual financial information, is the responsibility of the Directorate of Planning and Financial Management

The Annual Corporate Governance Report and the Non-Financial Statement attached to the Management Report within statutory annual financial reporting are prepared by the Deputy General Directorate of the General Secretariat and the Deputy General Directorate of Communication and External Relations, respectively.

When preparing this information, the Deputy General Directorate of Finance calls on the support of the departments responsible for collating certain supporting information that has to be disclosed in the periodic financial reports. In addition, once the information has been prepared, and before it is published, these departments are also required to review and give final approval of the information under their responsibility.

As part of the process of preparing half-yearly and annual reporting, the Controller's Department is responsible for designing the accounting circuits for recording transactions in the Bank and for applying key controls as specified in the accounting close process on the basis of defined materiality thresholds. In this preparation, control procedures

have been defined and implemented that guarantee the quality of information and its reasonableness ahead of its presentation to management.

In this respect, the Corporate Directorate of Internal Audit is tasked with contributing, objectively and in an advisory capacity, to meeting the institution's goals, by systematically evaluating risk management and the oversight of the Bank's processes, issuing recommendations to improve their effectiveness.

The Audit and Compliance Committee is also involved in this review, notifying the Board of Directors, previously, of its conclusions on the financial information that the Company must publish periodically.

Ultimately, the Board of Directors approves the financial information that the Company must periodically disclose. These duties are set forth in the Board of Directors Regulations, as described in point F.1.1 above. This approval is formalised in the minutes of the various Board and Committee meetings.

The description of the ICFR is examined by the Deputy General Directorate of Finance and the Corporate Directorate of Internal Audit.

Within the framework of the specific controls and activities regarding transactions that may significantly affect the financial statements, the Bankia Group has identified material areas and specific risks, as well as significant processes in these areas, differentiating between business processes and transversal processes, and has documented in detail each of the processes, flows of activities, existing risks, mitigating controls, the frequency thereof, and those responsible for carrying out these activities.

Critical areas and meaningful processes are determined by applying quantitative criteria, complemented by qualitative criteria, to the main figures of the consolidated public financial statements, taking into account the defined materiality thresholds.

The business processes identified affect the following critical areas:

- Financial assets held for trading.
- Financial assets at fair value through other comprehensive income.
- Financial assets at amortised cost.
- Derivatives - Hedge accounting.
- Investments in joint ventures and associates.
- Non-current assets and disposal groups classified as held for sale.
- Financial liabilities held for trading.
- Financial liabilities at amortised cost.
- Provisions.
- Tax assets and liabilities.
- Commission earned on collection and payment services. The transversal processes identified are as follows:
- Accounting close.
- Consolidation.
- Judgements and estimates.
- General IT controls.

Accordingly, the accounting close process includes the following phases:

- Accounting close. The accounting close entails review, analysis and control over the close of the individual financial statements.
- Preparation of financial statements.
- Process of planning, preparation and review of statutory public financial reporting.

The estimate and assumption process is supported by a specific Policy approved by the Board of Directors, the purpose of which is to address the most relevant elements subject to judgements and estimates, the classification thereof, generally used assumptions and/or estimates (be they objective or subjective) and the individuals responsible for making them. This policy applies to balances and transactions identified as significant within the Bankia Group and that entail estimates or assumptions to a significant degree due to the various tiers of the Group as a part of the process of preparing financial information, referring mainly to the following:

- The fair value of certain financial and non-financial assets and liabilities.
- Impairment and the classification by levels of certain financial assets, considering the value of the collateral received, and non-financial assets (mainly property), as well as contingent liabilities.
- Classification of financial assets, in the context of the assessment to determine whether the contractual cash flows are solely payments of principal and interest on the principal amount outstanding.
- The assumptions used in the actuarial calculation of the post-employment benefit liabilities and obligations and other long-term commitments.

- The estimation of the recoverable amount and costs to sell of non-current assets held for sale, investment property and inventories, based on their nature, condition and the purpose for which they are intended, acquired by the Group in payment of debt, regardless of the legal format pursuant to which they were acquired.

- The recoverability of recognised deferred tax assets.

- The estimation of the commitments included in the agreement for the sale of the CIU custodian business.

- The useful life, right-of-use value and recoverable amount of tangible and intangible assets.

- The assumptions used to quantify certain provisions and the probability of occurrence of certain losses to which the Group is exposed due to its activity.

The supervisor of each of the affected areas is responsible for preparing the estimates. Moreover, within the framework of the process of preparing the regulated financial information, the Deputy General Directorate of Finance is responsible for gathering said estimates and presenting them to the relevant bodies for the notification and approval thereof.

Such estimates are presented to the Managing Committee, at least once a year, prior to their inclusion in the Group's Annual Accounts, ultimately responsibility lying with the Board of Directors, as indicated in the Annual Accounts themselves.

The Bank has in place a certification model for key controls within the system of Internal Control over Financial Reporting based on a "bottom-up" approach, which starts at the lower levels of the organisational structure, identified as the persons in charge of ICFR, and then rises to the Deputy General Directorate of Finance, thus ensuring that half-yearly/annual financial reporting is reliable when released to the market. To this end, in the form of a survey for the relevant period, each of the persons in charge of the key controls identified certifies the effective implementation of the controls, rising up through the various hierarchical levels up to the Corporate Department/Deputy General Directorate in question, finalising with the Deputy General Directorate of Finance, bringing the certification process to a close.

The Certification Model, coupled with self-assessment of key controls, evolves by leveraging the risk management and internal control system and interdepartmental synergies, continuously monitoring business processes and creating a common language for both processes.

The Controller's Department, forming part of the Deputy General Directorate of Finance, is responsible for launching the Certification Process every six months and for monitoring timely compliance in due form so that the Deputy General Directorate of Finance can certify the ICFR system prior to the release of public financial reporting.

The Bank carried out two certification processes in 2020 for the preparation of the half-yearly and annual financial statements. No significant incidents were uncovered that could have a material effect on the reliability of the financial information.

For the preparation of financial statements, the Deputy General Directorate of Finance presents the results of the certification process to the Board of Directors and the Audit and Compliance Committee.

Moreover, the Corporate Directorate of Internal Audit carries out supervisory functions, as described in sections F.5.1 and F.5.2.

F.3.2 Internal IT control policies and procedures (access security, control of changes, system operation, operational continuity and segregation of duties, among others) which support significant processes within the company relating to the preparation and publication of financial information.

The Deputy General Directorate of Finance is responsible for preparing and publishing the public financial information.

The General Directorate of People, Resources and Technology is responsible for the Bank's IT and telecommunication systems. Its duties include defining and monitoring the cybersecurity policies, circulars and guides for applications and infrastructures, including the IT internal control model.

The key tasks assumed by this department in relation to IT systems are as follows:

- Surveillance and control of data access and physical security systems.

- Defining and setting in place the logical and technological architecture, development methodology and quality control of the Bank's software.

- Protecting Bankia's information as a key asset.

The Bankia Group has a set of cybersecurity rules and regulations, which are mandatory for all persons who process information, including the Cybersecurity Policy and Regulations. These documents are available to all employees on the Corporate intranet.

The Cybersecurity Policy sets out the general regulatory framework, setting for the responsibilities with respect to data protection and covering the general philosophy, the goals, the principles and the acceptable ways of proceeding with respect

to information security, and constituting the first level of this set of rules and regulations. The objective is to duly protect the information of the Bankia Group.

The Cybersecurity Regulations detail the actions and controls applied to duly protect Bankia's information. Its aim is to support and facilitate the Policy. In this regard, it takes in the following aspects:

- NCS 001 - Governance
- NCS 002 - Cyber-risk management
- NCS 003 - IT Asset Management
- NCS 004 - Information Classification
- NCS 005 - Access Control
- NCS 006 - Human Resources
- NCS 007 - Third-party Relations
- NCS 008 - Communications
- NCS 009 - Operations
- NCS 010 - Encryption
- NCS 011 - Physical Security
- NCS 012 - Vigilance and Response
- NCS 013 - Business Continuity - NCS 014 - Compliance

The Cybersecurity Rules and Regulations implement and define, inter alia, the measures and controls to protect access, operating procedures and guides documented and reviewed periodically to manage application security, the principles of segregation of duties, the management of back-up copies, the definition of responsibilities and functions regarding security, training and raising awareness among those who process data, as well as issues regarding confidentiality, integrity and availability of information and assets.

The Company's development process, which broadly encompasses the development of new applications or modification of existing applications and appropriate management of these projects, is based on SDLC maturity models.

The Entity has a Business Continuity Policy that sets out the lines of action to prevent or minimize the potential losses for the Entity caused by a disruptive event. This policy also guarantees that Bankia has defined and tested strategies for each critical function that ensure its business processes can be restored and recovered. These lines of action are reviewed periodically through a test plan to ensure that all continuity preparations are performed adequately and produce optimal results in the recovery of business processes.

Bankia also has eight information security operating processes and another five business continuity processes considered internal control procedures.

The entity has back-up architecture in its main processing centres. Back-up policies and procedures also ensure information is available and can be recovered in the event of a loss.

F.3.3 Internal control policies and procedures for overseeing the management of activities subcontracted to third parties, as well as of those aspects of assessment, calculation or valuation entrusted to independent experts, which may materially affect financial statements.

The Bankia Group has an outsourcing policy for services and functions approved by the Board of Directors, along with a governance model for outsourcing.

The outsourcing policy for services and functions, understood as delegating to a third party the provision of services and/or exercise of functions inherent in the normal or typical provision of banking or investment services, outlines the criteria and guidelines necessary to address specific aspects of delegation in order to: comply with applicable legislation; identify, measure, control and manage the inherent outsourcing risks (operational, reputational and cyberrisk); and adopt appropriate measures to prevent or mitigate exposure to potential risks, in particularly when essential services or functions are outsourced.

The Bankia Group's service and function outsourcing policy is supplemented with the Outsourcing Governance Model Functional Manual, which sets out the activities and responsibilities defined in this area, which are applied throughout the outsourcing arrangement (including, in light of the nature and complexity of the activities, as well as the characteristics of the service or function to be outsourced, an analysis of the reasons underlying the outsourcing, the arrangement of the outsourcing agreement, performance of the agreement until it is terminated, contingency plans and exit strategy).

Before outsourcing essential functions and services, the Entity conducts a feasibility study of the service or function, and selects and evaluates providers.

The prior analysis of the outsourcing of services or functions takes into account, inter alia, the following factors: cost-benefit analysis of the outsourcing; policy aspects that could condition the outsourcing; the impact of the outsourcing on the Company's business and the evaluation of the risks incurred by the entity, as well as the requirements as regards internal control mechanisms provided for in the current applicable regulations; the entity's capacity and experience in

order to effectively monitor outsourced functions and to adequately manage the risks associated with such outsourcing, above all where such outsourcing involves an essential service or function and/or the use of new technologies; and the development, implementation and maintenance of an emergency plan for disaster recovery and periodic inspection of computer security mechanisms, where necessary in view of the outsourced role or service.

Meanwhile, the selection and assessment of third parties is carried out taking into consideration several factors to ensure that the provider to which the function or provision of services is outsourced: has the appropriate competence, ability, experience, quality and stability, and, depending on the characteristics of the service or function, the appropriate resources and organisational structure; has the necessary authorisation required by applicable legislation to perform the outsourced function or services reliably and professionally; complies with the main laws and regulations applicable to it, in particular anti-money laundering and customer protection laws; performs the outsourced function or service effectively and in accordance with applicable legislation; cooperates with the supervisory authority in all matters relating to the activities outsourced to it; protects all confidential information related to the entity and its customers and, if it accesses, processes and/or stores personal data controlled the Bankia Group, offers sufficient guarantees that it applies appropriate technical and organisational measures so that such access, processing and/or storage complies with prevailing data protection regulations. And, in particular, for services or functions considered essential: supervises the correct performance of the outsourced functions; adequately manages the outsourcing risks and, in this respect, has the appropriate measures to this end, such as the performance of regular data back-ups and security checks, and has, applies and keeps up to date an emergency and contingency plan to enable it to continue its activity and limit losses in the event of serious business-related incidents.

The organisational unit that receives the services is responsible for the monitoring and continuing oversight of the services or functions performed by the outsourcing services provider, regarding both fulfilment of the contract and the effective performance of the outsourced service. For critical services or functions, the Outsourcing Control Centre prepares regular monitoring reports and, once their content has been reviewed by the Corporate Directorate of Internal Audit, which assesses both the risks and rewards of the outsourcing, presents them to the Board of Directors. To ensure proper control and monitoring of the service and depending on its nature, meetings are held regularly throughout the year with the outsourcing service provider. The contract sets out the frequency, the issues to be addressed and the persons attending these meetings.

The entity engages independent experts to obtain certain evaluations, calculations and estimates used to prepare the financial statements published on the securities markets. In general, the main areas that outsource these services are related to actuarial calculations, real estate appraisals, and the measurement of financial instruments and investments/disposals. In this regard, the individual person in charge of each area affected monitors the results of the reports produced to determine their consistency and reasonableness. The Deputy General Directorate of Finance checks the consistency of the findings within the framework of preparing regulatory reporting, as does the external auditor under the framework of its review engagement, in addition to any review procedures that may be implemented by the Corporate Directorate of Internal Audit in accordance with the approved work plans.

F.4. Information and communication

Report on whether the company has at least the following, describing their main characteristics:

F.4.1 A specifically assigned function for defining and updating accounting policies (accounting policy area or department) and resolving doubts or conflicts arising from their interpretation, maintaining a free flow of information to those responsible for operations in the organisation, as well as an up-to-date accounting policy manual distributed to the business units through which the company operates.

The Deputy General Directorate of Finance is tasked with establishing and updating the accounting policies and complying with the Bankia Group's regulatory requirements. The functions performed include the following:

- Analysing the accounting standards issued by the various pertinent authorities that could have an impact on the Group's financial statements.
- Maintaining and updating existing accounting manuals and plans.
- Analysing and calculating the accounting impacts of the Group's new products, businesses and operations.
- Referring to and interpreting accounting standards in order to draft basic announcements, policies, judgments and estimates for subsequent practical application.
- Coordinating communication with the supervisory accounting authorities.

-Coordinating work schedules and liaising with external auditors.

-Preparing reports and developing specific rules.

The Deputy General Directorate of Finance is also responsible for receiving and resolving any doubts or disputes over interpretation of the accounting treatment of specific transactions in the Group (both the parent company and the subsidiaries included in the scope of consolidation).

The Bank has an Accounting Policies Manual, approved by the Board of Directors and updated at least once a year to include any applicable amendments to accounting standards. All areas affected are notified and the policy is published on the Corporate Intranet.

The Bank rounds off the Accounting Policies Manual with several policies and manuals for certain matters that include specific issues requiring more in-depth development.

Indeed, as a complement to the Manual, there is a Financial Disclosure Policy, approved by the Board of Directors, which sets out the main disclosures required in regulated financial reporting and establishes the principles governing consistency between the information disclosed in the Entity's regulated financial reports and that of other regulatory information (Basel Pillar III).

F.4.2 Mechanisms for capturing and preparing financial information in standardised formats for application and use by all units of the entity or group, and support its main financial statements and notes, as well as disclosures concerning ICFR.

The Deputy General Directorate of Finance issues the accounting policies and procedures to be applied generally in the preparation of individual financial statements by companies that are majority owned by Bankia (subsidiaries, hereinafter "companies" or "investees"), to be reported to the Group so it may prepare its consolidated financial statements, as well as precise instructions on the information to be reported, regulating the minimum content and deadlines of the information to be furnished by the various entities comprising the consolidated Group.

The Bankia Group boasts IT systems and applications that enable it to aggregate and standardise the individual accounting records of the Group's business areas and subsidiaries to the required level of detail, as well as to prepare the individual and consolidated financial statements ultimately disclosed to the markets.

Moreover, it has in place a procedure for centralising the gathering of information on companies comprising the group and which includes criteria and models ensuring the information is received in standardised form. There are also a series of controls implemented that allow the reliability and accuracy of the information received from the subsidiaries to be ensured.

The Deputy General Directorate of Finance is responsible for preparing public financial information of a regulatory nature.

F.5. Supervision of the functioning of the system

Report on at least the following, describing their principal features:

F.5.1 The activities of the audit committee in overseeing ICFR as well as whether there is an internal audit function one of the responsibilities of which is to provide support to the committee in its task of supervising the internal control system, including ICFR. Additionally, describe the scope of ICFR assessment made during the year and the procedure through which the person responsible for performing the assessment communicates its results, whether the company has an action plan detailing possible corrective measures, and whether their impact on financial reporting has been considered.

Bankia's Board of Directors Regulations establishes that the internal audit services must comply with any requests for information from the Audit and Compliance Committee in the performance of its duties.

Reporting functionally to the Audit and Compliance Committee and organically to the Chief Executive Officer, Bankia's Corporate Directorate of Internal Audit had 112 employees at 31 December 2020.

The functions of Bankia's Corporate Directorate of Internal Audit include supporting the Audit and Compliance Committee in ensuring the internal control system operates correctly, by performing periodic reviews of financial reporting procedures.

Bankia's Corporate Directorate of Internal Audit has annual audit plans which are submitted to the Audit and Compliance, for a favourable report, and which are subsequently approved by the Board of Directors. The reports issued refer, inter alia, to the assessment of risk management, internal control, corporate governance and IT systems processes, including an analysis of assets and their appropriate financial accounting classification.

The 2020 Audit Plan includes assessment activities covering aspects related to the process of preparing the financial information. Furthermore, in 2020, within the rotation plan established for the supervision of the ICFR and in line with the 3-year period recommended by CNMV, 8 of the processes identified at the Entity were reviewed. The scope for each of the reviewed periods is as follows:

- The sufficiency of the controls implemented to mitigate the risks identified.
- Evidence of execution of the controls identified in the ICFR documentation.
- Review of the outcome of the self-assessment and certifications corresponding to the processes analysed.

The outcome of the review is set out in a report which is circulated to the groups responsible for control, and to the Controller's Department (which ensures that the controls continue to work as intended). Recommendations in support of an action plan are proposed and approved by the areas involved to resolve any weakness detected, defining responsibilities and deadlines for implementing the action.

Once a quarter, the Corporate Directorate of Internal Audit provides the Audit and Compliance Committee with the results of the verification and validation procedures performed by the internal audit team, which also includes the action plans designed to remedy the most significant weaknesses detected.

The minutes of the meetings of the Audit and Compliance Committee set out the activities performed in relation to supervision, planning (approval of the annual operations plan, allocation of responsibilities to implement the plan, etc.) and review of the results obtained.

F.5.2 Whether there is a discussion procedure whereby the auditor (as defined in the Spanish Technical Audit Standards), the internal auditor and other experts can report to senior management and the audit committee or directors of the company any significant weaknesses in internal control identified during the review of the annual financial statements or any others they have been assigned. Additionally, state whether an action plan is available for correcting or mitigating any weaknesses detected.

Bankia's auditor has direct access to Bankia's senior management, holding regular meetings to obtain the information needed to perform its work and to communicate any control weaknesses detected during the audit.

In addition, the auditor regularly informs the Audit and Compliance Committee of the findings of its audit and review of Bankia's financial information, including any aspect that it deems relevant, and assists this Committee when it presents financial information.

The Corporate Directorate of Internal Audit, with the frequency set out in the Internal Audit Policy approved by the Board of Directors, presents to Senior Management and the Audit and Compliance Committee the results of the assurance and validation work performed under the Annual Audit Plan previously approved by the Board, or those arising from specific reviews requested by the Audit and Compliance Committee, supervisory bodies or other associations, including the related action plans to address the most significant deficiencies uncovered.

The meeting minutes record the various activities performed in its supervisory work, both in terms of planning (approval of the annual operating plan, appointment of the persons in charge, etc) and the review of the results obtained.

F.6. Other relevant information

Not applicable.

F.7. External auditor's report

Report:

F.7.1 Whether the ICFR information sent to the markets has been subjected to review by the external auditor, in which case the entity should include the corresponding report as an attachment. If not, reasons why should be given.

In 2020, Bankia's external auditor reviewed the information contained in section F of the annual corporate governance report regarding ICFR in accordance with generally accepted professional standards in Spain regarding the engagement of the agreed procedures and, in particular, as provided for in the guidance document on the audit report on information provided by listed companies on their ICFR issued by professional bodies and auditors, and published by the CNMV on its website.

The external auditors' report will be included as an appendix to the annual corporate governance report.

G. DEGREE OF COMPLIANCE WITH CORPORATE GOVERNANCE RECOMMENDATIONS

Specify the company's degree of compliance with recommendations of the Good Governance Code for listed companies.

In the event that a recommendation is not followed or only partially followed, a detailed explanation of the reasons must be included so that shareholders, investors and the market in general have enough information to assess the company's conduct. General explanations are not acceptable.

1. That the articles of incorporation of listed companies should not limit the maximum number of votes that may be cast by one shareholder or contain other restrictions that hinder the takeover of control of the company through the acquisition of its shares on the market.

Complies [X] Explain []

2. That when the listed company is controlled by another entity in the meaning of Article 42 of the Commercial Code, whether listed or not, and has, directly or through its subsidiaries, business relations with said entity or any of its subsidiaries (other than the listed company) or carries out activities related to those of any of them it should make accurate public disclosures on:

- a) The respective areas of activity and possible business relationships between the listed company or its subsidiaries and the parent company or its subsidiaries.
- b) The mechanisms in place to resolve any conflicts of interest that may arise.

Complies [X] Partially complies [] Explain [] Not applicable []

3. That, during the ordinary General Shareholders' Meeting, as a complement to the distribution of the written annual corporate governance report, the chairman of the Board

of Directors should inform shareholders orally, in sufficient detail, of the most significant aspects of the company's corporate governance, and in particular:

- a) Changes that have occurred since the last General Shareholders' Meeting.
- b) Specific reasons why the company has not followed one or more of the recommendations of the Code of Corporate Governance and the alternative rules applied, if any.

Complies [X] Complies partially [] Explain []

4. That the company should define and promote a policy on communication and contact with shareholders and institutional investors, within the framework of their involvement in the company, and with proxy advisors that complies in all aspects with rules against market abuse and gives equal treatment to similarly situated shareholders. And that the company should publish this policy on its website, including information on how it has been put into practice and identifying the contact persons or those responsible for implementing it.

And that, without prejudice to the legal obligations regarding dissemination of inside information and other types of regulated information, the company should also have a general policy regarding the communication of economic-financial, non-financial and corporate information through such channels as it may consider appropriate (communication media, social networks or other channels) that helps to maximise the dissemination and quality of information available to the market, investors and other stakeholders.

Complies [X] Complies partially [] Explain []

5. That the Board of Directors should not submit to the General Shareholders' Meeting any proposal for delegation of powers allowing the issue of shares or convertible securities with the exclusion of preemptive rights in an amount exceeding 20% of the capital at the time of delegation.

And that whenever the Board of Directors approves any issue of shares or convertible securities with the exclusion of preemptive rights, the company should immediately publish the reports referred to by company law on its website.

Complies [X] Complies partially [] Explain []

6. That listed companies that prepare the reports listed below, whether under a legal obligation or voluntarily, should publish them on their website with sufficient time before the General Shareholders' Meeting, even if their publication is not mandatory:

- a) Report on the auditor's independence.
- b) Reports on the workings of the audit and nomination and remuneration committees.
- c) Report by the audit committee on related party transactions.

Complies [X] Complies partially [] Explain []

7. That the company should transmit in real time, through its website, the proceedings of the General Shareholders' Meetings.

And that the company should have mechanisms in place allowing the delegation and casting of votes by means of data transmission and even, in the case of large-caps and to the extent that it is proportionate, attendance and active participation in the General Meeting to be conducted by such remote means.

Complies [X] Complies partially [] Explain []

8. That the audit committee should ensure that the financial statements submitted to the General Shareholders' Meeting are prepared in accordance with accounting regulations. And that in cases in which the auditor has included a qualification or reservation in its audit report, the chairman of the audit committee should clearly explain to the general meeting the opinion of the audit committee on its content and scope, making a summary of this opinion available to shareholders at the time when the meeting is called, alongside the other Board proposals and reports.

Complies [X] Complies partially [] Explain []

9. That the company should permanently publish on its website the requirements and procedures for certification of share ownership, the right of attendance at the General Shareholders' Meetings, and the exercise of the right to vote or to issue a proxy.

And that such requirements and procedures promote attendance and the exercise of shareholder rights in a non-discriminatory fashion.

Complies [X] Complies partially [] Explain []

10. That when a duly authenticated shareholder has exercised his or her right to complete the agenda or to make new proposals for resolutions in advance of the General Shareholders' Meeting, the company:

- a) Should immediately distribute such complementary points and new proposals for resolutions.
- b) Should publish the attendance, proxy and remote voting card specimen with the necessary changes such that the new agenda items and alternative proposals can be voted on in the same terms as those proposed by the Board of Directors.
- c) Should submit all these points or alternative proposals to a vote and apply the same voting rules to them as to those formulated by the Board of Directors including, in particular, assumptions or default positions regarding votes for or against.
- d) That after the General Shareholders' Meeting, a breakdown of the voting on said additions or alternative proposals be communicated.

Complies [] Partially complies [] Explain [] Not applicable [X]

11. That if the company intends to pay premiums for attending the General Shareholders' Meeting, it should establish in advance a general policy on such premiums and this policy should be stable.

Complies [☐] Partially complies [☐] Explain [☐] Not applicable [X]

12. That the Board of Directors should perform its functions with a unity of purpose and independence of criterion, treating all similarly situated shareholders equally and being guided by the best interests of the company, which is understood to mean the pursuit of a profitable and sustainable business in the long term, promoting its continuity and maximising the economic value of the business.

And that in pursuit of the company's interest, in addition to complying with applicable law and rules and conducting itself on the basis of good faith, ethics and a respect for commonly accepted best practices, it should seek to reconcile its own company interests, when appropriate, with the interests of its employees, suppliers, clients and other stakeholders that may be affected, as well as the impact of its corporate activities on the communities in which it operates and on the environment.

Complies [X] Complies partially [☐] Explain [☐]

13. That the Board of Directors should be of an appropriate size to perform its duties effectively and in a collegial manner, which makes it advisable for it to have between five and fifteen members.

Complies [X] Explain [☐]

14. That the Board of Directors should approve a policy aimed at favouring an appropriate composition of the Board and that:

- a) Is concrete and verifiable;
- b) Ensures that proposals for appointment or re-election are based upon a prior analysis of the skills required by the Board of Directors; and
- c) Favours diversity of knowledge, experience, age and gender. For these purposes, it is considered that the measures that encourage the company to have a significant number of female senior executives favour gender diversity.

That the result of the prior analysis of the skills required by the Board of Directors be contained in the supporting report from the nomination committee published upon calling the General Shareholders' Meeting to which the ratification, appointment or re-election of each director is submitted.

The nomination committee will annually verify compliance with this policy and explain its findings in the annual corporate governance report.

Complies [X] Complies partially [☐] Explain [☐]

15. That proprietary and independent directors should constitute a substantial majority of the Board of Directors and that the number of executive directors be kept to a minimum, taking into account the complexity of the corporate group and the percentage of equity participation of executive directors.

And that the number of female directors should represent at least 40% of the members of the Board of Directors before the end of 2022 and thereafter, and no less 30% prior to that date.

Complies [☐] Complies partially [☒] Explain [☐]

The General Meeting of Shareholders held on 27 March 2020 resolved to set the number of members of the Board of Directors at 13.

The current distribution of the above Board members is as follows: three executive directors, one external director and nine independent directors, so that independent directors account for an ample majority of the Board, representing 69% of its members.

It should also be noted that a new independent female director was appointed in 2020 to increase the number of female directors and attempt to reach the target for 30% of board members to be women in 2020.

The above target was ultimately only partially met as events this year, Covid 19 and the planned merger with CaixaBank approved in the last quarter of the year, have prevented further changes to the Company's Board.

16. That the number of proprietary directors as a percentage of the total number of non-executive directors not be greater than the proportion of the company's share capital represented by those directors and the rest of the capital.

This criterion may be relaxed:

- a) In large-cap companies where very few shareholdings are legally considered significant.
- b) In the case of companies where a plurality of shareholders is represented on the Board of Directors without ties among them.

Complies [☒] Explain [☐]

17. That the number of independent directors should represent at least half of the total number of directors.

That, however, when the company does not have a high level of market capitalisation or in the event that it is a large-cap company with one shareholder or a group of shareholders acting in concert who together control more than 30% of the company's share capital, the number of independent directors should represent at least one third of the total number of directors.

Complies [☒] Explain [☐]

18. That companies should publish the following information on their directors on their website, and keep it up to date:

- a) Professional profile and biography.

- b) Any other Boards to which the directors belong, regardless of whether or not the companies are listed, as well as any other remunerated activities engaged in, regardless of type.
- c) Category of directorship, indicating, in the case of individuals who represent significant shareholders, the shareholder that they represent or to which they are connected.
- d) Date of their first appointment as a director of the company's Board of Directors, and any subsequent re-elections.
- e) Company shares and share options that they own.

Complies [X] Complies partially [] Explain []

19. That the annual corporate governance report, after verification by the nomination committee, should explain the reasons for the appointment of any proprietary directors at the proposal of shareholders whose holding is less than 3%. It should also explain, if applicable, why formal requests from shareholders for presence on the Board were not honoured, when their shareholding was equal to or exceeded that of other shareholders whose proposal for proprietary directors was honoured.

Complies [] Partially complies [] Explain [] Not applicable [X]

20. That proprietary directors representing significant shareholders should resign from the Board when the shareholder they represent disposes of its entire shareholding. They should also resign, in a proportional fashion, in the event that said shareholder reduces its percentage interest to a level that requires a decrease in the number of proprietary directors.

Complies [X] Partially complies [] Explain [] Not applicable []

21. That the Board of Directors should not propose the dismissal of any independent director before the completion of the director's term provided for in the articles of incorporation unless the Board of Directors finds just cause and a prior report has been prepared by the nomination committee. Specifically, just cause is considered to exist if the director takes on new duties or commits to new obligations that would interfere with his or her ability to dedicate the time necessary for attention to the duties inherent to his or her post as a director, fails to complete the tasks inherent to his or her post, or is affected by any of the circumstances which would cause the loss of independent status in accordance with applicable law.

The dismissal of independent directors may also be proposed as a result of a public takeover bid, merger or other similar corporate transaction entailing a change in the shareholder structure of the company, provided that such changes in the structure of the Board are the result of application of the proportionate representation criterion provided in Recommendation 16.

Complies [X] Explain []

22. That companies should establish rules requiring that directors inform the Board of Directors and, where appropriate, resign from their posts, when circumstances arise which affect them, whether or not related to their actions in the company itself, and which may harm the company's standing and reputation, and in particular requiring them to inform the Board of any criminal proceedings in which they appear as suspects or defendants, as well as of how the legal proceedings subsequently unfold.

And that, if the Board is informed or becomes aware in any other manner of any of the circumstances mentioned above, it must investigate the case as quickly as possible and, depending on the specific circumstances, decide, based on a report from the nomination and remuneration committee, whether or not any measure must be adopted, such as the opening of an internal investigation, asking the director to resign or proposing that he or she be dismissed. And that these events must be reported in the annual corporate governance report, unless there are any special reasons not to do so, which must also be noted in the minutes. This without prejudice to the information that the company must disseminate, if appropriate, at the time when the corresponding measures are implemented.

Complies [X] Complies partially [] Explain []

23. That all directors clearly express their opposition when they consider any proposal submitted to the Board of Directors to be against the company's interests. This particularly applies to independent directors and directors who are unaffected by a potential conflict of interest if the decision could be detrimental to any shareholders not represented on the Board of Directors.

Furthermore, when the Board of Directors makes significant or repeated decisions about which the director has serious reservations, the director should draw the appropriate conclusions and, in the event the director decides to resign, explain the reasons for this decision in the letter referred to in the next recommendation.

This recommendation also applies to the secretary of the Board of Directors, even if he or she is not a director.

Complies [X] Partially complies [] Explain [] Not applicable []

24. That whenever, due to resignation or resolution of the General Shareholders' Meeting, a director leaves before the completion of his or her term of office, the director should explain the reasons for this decision, or in the case of non-executive directors, their opinion of the reasons for their removal, in a letter addressed to all members of the Board of Directors.

And that, without prejudice to all this being reported in the annual corporate governance report, insofar as it is relevant to investors, the company must publish the removal as quickly as possible, adequately referring to the reasons or circumstances adduced by the director.

Complies [X] Partially complies [] Explain [] Not applicable []

25. That the nomination committee should make sure that non-executive directors have sufficient time available in order to properly perform their duties.

And that the Board regulations establish the maximum number of company Boards on which directors may sit.

Complies [X] Complies partially [] Explain []

26. That the Board of Directors meets frequently enough to be able to effectively perform its duties, and at least eight times per year, following a schedule of dates and agendas established at the beginning of the year and allowing each director individually to propose other items that do not originally appear on the agenda.

Complies [X] Complies partially [] Explain []

27. That director absences occur only when absolutely necessary and be quantified in the annual corporate governance report. And when absences do occur, that the director appoint a proxy with instructions.

Complies [X] Complies partially [] Explain []

28. That when directors or the secretary express concern regarding a proposal or, in the case of directors, regarding the direction in which the company is headed and said concerns are not resolved by the Board of Directors, such concerns should be included in the minutes at the request of the director expressing them.

Complies [X] Partially complies [] Explain [] Not applicable []

29. That the company should establishes adequate means for directors to obtain appropriate advice in order to properly fulfil their duties including, should circumstances warrant, external advice at the company's expense.

Complies [X] Complies partially [] Explain []

30. That, without regard to the knowledge necessary for directors to complete their duties, companies make refresher courses available to them when circumstances make this advisable.

Complies [X] Explain [] Not applicable []

31. That the agenda for meetings should clearly indicate those matters on which the Board of Directors is to make a decision or adopt a resolution so that the directors may study or gather all relevant information ahead of time.

When, in exceptional circumstances, the chairman wishes to bring urgent matters for decision or resolution before the Board of Directors which do not appear on the agenda, prior express agreement of a majority of the directors shall be necessary, and said consent shall be duly recorded in the minutes.

Complies [X] Complies partially [] Explain []

32. That directors be periodically informed of changes in shareholding and of the opinions of significant shareholders, investors and rating agencies of the company and its group.

Complies [X] Complies partially [] Explain []

33. That the chairman, as the person responsible for the efficient workings of the Board of Directors, in addition to carrying out the duties assigned by law and the articles of incorporation, should prepare and submit to the Board of Directors a schedule of dates and matters to be considered; organise and coordinate the periodic evaluation of the Board as well as, if applicable, the chief executive of the company, should be responsible for leading the Board and the effectiveness of its work; ensuring that sufficient time is devoted to considering strategic issues, and approve and supervise refresher courses for each director when circumstances make this advisable.

Complies [X] Complies partially [] Explain []

34. That when there is a coordinating director, the articles of incorporation or Board regulations should confer upon him or her the following powers in addition to those conferred by law: to chair the Board of Directors in the absence of the chairman and deputy chairmen, should there be any; to reflect the concerns of non-executive directors; to liaise with investors and shareholders in order to understand their points of view and respond to their concerns, in particular as those concerns relate to corporate governance of the company; and to coordinate a succession plan for the chairman.

Complies [X] Partially complies [] Explain [] Not applicable []

35. That the secretary of the Board of Directors should pay special attention to ensure that the activities and decisions of the Board of Directors take into account such recommendations regarding good governance contained in this Good Governance Code as may be applicable to the company.

Complies [X] Explain []

36. That the Board of Directors meet in plenary session once a year and adopt, where appropriate, an action plan to correct any deficiencies detected in the following:

- a) The quality and efficiency of the Board of Directors' work.
- b) The workings and composition of its committees.
- c) Diversity in the composition and skills of the Board of Directors.
- d) Performance of the chairman of the Board of Directors and of the chief executive officer of the company.
- e) Performance and input of each director, paying special attention to those in charge of the various Board committees.

In order to perform its evaluation of the various committees, the Board of Directors will take a report from the committees themselves as a starting point and for the evaluation of the Board, a report from the nomination committee.

Every three years, the Board of Directors will rely for its evaluation upon the assistance of an external advisor, whose independence shall be verified by the nomination committee.

Business relationships between the external adviser or any member of the adviser's group and the company or any company within its group must be specified in the annual corporate governance report.

The process and the areas evaluated must be described in the annual corporate governance report.

Complies ☒ Complies partially ☐ Explain ☐

37. That if there is an executive committee, it must contain at least two non-executive directors, at least one of whom must be independent, and its secretary must be the secretary of the Board.

Complies ☐ Partially complies ☐ Explain ☐ Not applicable ☒

38. That the Board of Directors must always be aware of the matters discussed and decisions taken by the executive committee and that all members of the Board of Directors receive a copy of the minutes of meetings of the executive committee.

Complies ☐ Partially complies ☐ Explain ☐ Not applicable ☒

39. That the members of the audit committee, in particular its chairman, be appointed in consideration of their knowledge and experience in accountancy, audit and risk management issues, both financial and non-financial.

Complies ☒ Complies partially ☐ Explain ☐

40. That under the supervision of the audit committee, there should be a unit in charge of the internal audit function, which ensures that information and internal control systems operate correctly, and which reports to the non-executive chairman of the Board or of the audit committee.

Complies ☒ Complies partially ☐ Explain ☐

41. That the person in charge of the unit performing the internal audit function should present an annual work plan to the audit committee, for approval by that committee or by the Board, reporting directly on its execution, including any incidents or limitations of scope, the results and monitoring of its recommendations, and present an activity report at the end of each year.

Complies ☒ Partially complies ☐ Explain ☐ Not applicable ☐

42. That in addition to the provisions of applicable law, the audit committee should be responsible for the following:

1. With regard to information systems and internal control:

- a) Supervising and evaluating the process of preparation and the completeness of the financial and non-financial information, as well as the control and management systems for financial and non-financial risk relating to the company and, if applicable, the group - including operational , technological, legal, social, environmental, political and reputational risk, or risk related to corruption - reviewing compliance with regulatory requirements, the appropriate delimitation of the scope of consolidation and the correct application of accounting criteria.
- b) Ensuring the independence of the unit charged with the internal audit function; proposing the selection, appointment and dismissal of the head of internal audit; proposing the budget for this service; approving or proposing its orientation and annual work plans for approval by the Board, making sure that its activity is focused primarily on material risks (including reputational risk); receiving periodic information on its activities; and verifying that senior management takes into account the conclusions and recommendations of its reports.
- c) Establishing and supervising a mechanism that allows employees and other persons related to the company, such as directors, shareholders, suppliers, contractors or subcontractors, to report any potentially serious irregularities, especially those of a financial or accounting nature, that they observe in the company or its group. This mechanism must guarantee confidentiality and in any case provide for cases in which the communications can be made anonymously, respecting the rights of the whistleblower and the person reported.
- d) Generally ensuring that internal control policies and systems are effectively applied in practice.

2. With regard to the external auditor:

- a) In the event that the external auditor resigns, examining the circumstances leading to such resignation.
- b) Ensuring that the remuneration paid to the external auditor for its work does not compromise the quality of the work or the auditor's independence.
- c) Making sure that the company informs the CNMV of the change of auditor, along with a statement on any differences that arose with the outgoing auditor and, if applicable, the contents thereof.
- d) Ensuring that the external auditor holds an annual meeting with the Board of Directors in plenary session in order to make a report regarding the tasks performed and the development of the company's accounting situation and risks.
- e) Ensuring that the company and the external auditor comply with applicable rules regarding the provision of services other than auditing, limits on the concentration of the auditor's business, and, in general, all other rules regarding auditors' independence.

Complies [X] Complies partially [] Explain []

43. That the audit committee be able to require the presence of any employee or manager of the company, even stipulating that he or she appear without the presence of any other member of management.

Complies [X] Complies partially [] Explain []

44. That the audit committee be kept abreast of any corporate and structural changes planned by the company in order to perform an analysis and draw up a prior report to the Board of Directors on the economic conditions and accounting implications and, in particular, any exchange ratio involved.

Complies [X] Partially complies [] Explain [] Not applicable []

45. That the risk management and control policy identify or determine, as a minimum:

- a) The various types of financial and non-financial risks (including operational, technological, legal, social, environmental, political and reputational risks and risks relating to corruption) which the company faces, including among the financial or economic risks contingent liabilities and other off-balance sheet risks.
- b) A risk control and management model based on different levels, which will include a specialised risk committee when sector regulations so require or the company considers it to be appropriate.
- c) The level of risk that the company considers to be acceptable.
- d) Measures in place to mitigate the impact of the risks identified in the event that they materialise.
- e) Internal control and information systems to be used in order to control and manage the aforementioned risks, including contingent liabilities or off-balance sheet risks.

Complies [X] Complies partially [] Explain []

46. That under the direct supervision of the audit committee or, if applicable, of a specialised committee of the Board of Directors, an internal risk control and management function should exist, performed by an internal unit or department of the company which is expressly charged with the following responsibilities:

- a) Ensuring the proper functioning of the risk management and control systems and, in particular, that they adequately identify, manage and quantify all material risks affecting the company.
- b) Actively participating in drawing up the risk strategy and in important decisions regarding risk management.
- c) Ensuring that the risk management and control systems adequately mitigate risks as defined by the policy laid down by the Board of Directors.

Complies [X] Complies partially [] Explain []

47. That in designating the members of the nomination and remuneration committee - or of the nomination committee and the remuneration committee if they are separate - care be taken to ensure that they have the knowledge, aptitudes and experience appropriate to the functions that they are called upon to perform and that the majority of said members are independent directors.

Complies [X] Complies partially [] Explain []

48. That large-cap companies have separate nomination and remuneration committees.

Complies [X] Explain [] Not applicable []

49. That the nomination committee consult with the chairman of the Board of Directors and the chief executive of the company, especially in relation to matters concerning executive directors.

And that any director be able to ask the nomination committee to consider potential candidates that he or she considers suitable to fill a vacancy on the Board of Directors.

Complies [X] Complies partially [] Explain []

50. That the remuneration committee exercise its functions independently and that, in addition to the functions assigned to it by law, it should be responsible for the following:

- a) Proposing the basic conditions of employment for senior management to the Board of Directors.
- b) Verifying compliance with the company's remuneration policy.
- c) Periodically reviewing the remuneration policy applied to directors and senior managers, including share-based remuneration systems and their application, as well as ensuring that their individual remuneration is proportional to that received by the company's other directors and senior managers.
- d) Making sure that potential conflicts of interest do not undermine the independence of external advice given to the committee.
- e) Verifying the information on remuneration of directors and senior managers contained in the various corporate documents, including the annual report on director remuneration.

Complies [X] Complies partially [] Explain []

51. That the remuneration committee should consult with the chairman and the chief executive of the company, especially on matters relating to executive directors and senior management.

Complies [X] Complies partially [] Explain []

52. That the rules regarding the composition and workings of the supervision and control committees should appear in the regulations of the Board of Directors and that they should be consistent with those applying to legally mandatory committees in accordance with the foregoing recommendations, including:
- a) That they be composed exclusively of non-executive directors, with a majority of independent directors.
 - b) That their chairpersons be independent directors.
 - c) That the Board of Directors select members of these committees taking into account their knowledge, skills and experience and the duties of each committee; discuss their proposals and reports; and require them to render account of their activities and of the work performed in the first plenary session of the Board of Directors held after each committee meeting.
 - d) That the committees be allowed to avail themselves of outside advice when they consider it necessary to perform their duties.
 - e) That their meetings be recorded and be made available to all directors.

Complies [X] Partially complies [] Explain [] Not applicable []

53. That verification of compliance with the company's policies and rules on environmental, social and corporate governance matters, and with the internal codes of conduct be assigned to one or divided among more than one committee of the Board of Directors, which may be the audit committee, the nomination committee, a specialised committee on sustainability or corporate social responsibility or such other specialised committee as the Board of Directors, in the exercise of its powers of self-organisation, may have decided to create. And that such committee be composed exclusively of non-executive directors, with a majority of these being independent directors, and that the minimum functions indicated in the next recommendation be specifically assigned to it.

Complies [X] Complies partially [] Explain []

54. The minimum functions referred to in the foregoing recommendation are the following:
- a) Monitoring of compliance with the company's internal codes of conduct and corporate governance rules, also ensuring that the corporate culture is aligned with its purpose and values.
 - b) Monitoring the application of the general policy on communication of economic and financial information, non-financial and corporate information and communication with shareholders and investors, proxy advisors and other stakeholders. The manner in which the entity communicates and handles relations with small and medium-sized shareholders must also be monitored.
 - c) The periodic evaluation and review of the company's corporate governance system, and environmental and social policy, with a view to ensuring that they fulfil their purposes of promoting the interests of society and take account, as appropriate, of the legitimate interests of other stakeholders.

- d) Supervision of the company's environmental and social practices to ensure that they are in alignment with the established strategy and policy.
- e) Supervision and evaluation of the way in which relations with the various stakeholders are handled.

Complies [X] Complies partially [] Explain []

55. That environmental and social sustainability policies identify and include at least the following:

- a) The principles, commitments, objectives and strategy relating to shareholders, employees, clients, suppliers, social issues, the environment, diversity, tax responsibility, respect for human rights, and the prevention of corruption and other unlawful conduct
- b) Means or systems for monitoring compliance with these policies, their associated risks, and management.
- c) Mechanisms for supervising non-financial risk, including that relating to ethical aspects and aspects of business conduct.
- d) Channels of communication, participation and dialogue with stakeholders.
- e) Responsible communication practices that impede the manipulation of data and protect integrity and honour.

Complies [X] Complies partially [] Explain []

56. That director remuneration be sufficient in order to attract and retain directors who meet the desired professional profile and to adequately compensate them for the dedication, qualifications and responsibility demanded of their posts, while not being so excessive as to compromise the independent judgement of non-executive directors.

Complies [X] Explain []

57. That only executive directors should receive variable remuneration linked to corporate results and personal performance, as well as remuneration in the form of shares, options or rights to shares or instruments referenced to the share price and long-term savings plans such as pension plans, retirement schemes or other provident schemes.

Consideration may be given to delivering shares to non-executive directors as remuneration providing this is conditional upon their holding them until they cease to be directors. The foregoing shall not apply to shares that the director may need to sell in order to meet the costs related to their acquisition.

Complies [X] Complies partially [] Explain []

58. That, as regards variable remuneration, remuneration policies should incorporate the necessary limits and technical safeguards to ensure that such remuneration is in line with

the professional performance of its beneficiaries and not based solely on general developments in the markets or in the sector in which the company operates, or other similar circumstances.

And, in particular, that variable remuneration components:

- a) Are linked to pre-determined and measurable performance criteria and that such criteria take into account the risk incurred to achieve a given result.
- b) Promote the sustainability of the company and include non-financial criteria that are geared towards creating long term value, such as compliance with the company's rules and internal operating procedures and with its risk management and control policies.
- c) Are based on balancing the attainment of short-, medium- and long-term objectives, so as to allow remuneration of continuous performance over a period long enough to be able to assess its contribution to the sustainable creation of value, such that the elements used to measure performance are not associated only with one-off, occasional or extraordinary events.

Complies [X] Partially complies [] Explain [] Not applicable []

59. That the payment of variable remuneration components be subject to sufficient verification that previously established performance or other conditions have effectively been met. Entities must include in their annual report on director remuneration the criteria for the time required and methods used for this verification depending on the nature and characteristics of each variable component.

That, additionally, companies consider the inclusion of a reduction ('malus') clause for the deferral of the payment of a portion of variable remuneration components that would imply their total or partial loss if an event were to occur prior to the payment date that would make this advisable.

Complies [X] Partially complies [] Explain [] Not applicable []

60. That remuneration related to company results should take into account any reservations that might appear in the external auditor's report and that would diminish said results.

Complies [X] Partially complies [] Explain [] Not applicable []

61. That a material portion of executive directors' variable remuneration be linked to the delivery of shares or financial instruments referenced to the share price.

Complies [X] Partially complies [] Explain [] Not applicable []

62. That once shares or options or financial instruments have been allocated under remuneration schemes, executive directors be prohibited from transferring ownership or exercising options or rights until a term of at least three years has elapsed.

An exception is made in cases where the director has, at the time of the transfer or exercise of options or rights, a net economic exposure to changes in the share price for a market value equivalent to at least twice the amount of his or her fixed annual remuneration through the ownership of shares, options or other financial instruments.

The forgoing shall not apply to shares that the director may need to sell in order to meet the costs related to their acquisition or, following a favourable assessment by the nomination and remuneration committee, to deal with such extraordinary situations as may arise and so require.

Complies [X] Partially complies [] Explain [] Not applicable []

63. That contractual arrangements should include a clause allowing the company to demand reimbursement of the variable remuneration components in the event that payment was not in accordance with the performance conditions or when payment was made based on data subsequently shown to have been inaccurate.

Complies [X] Partially complies [] Explain [] Not applicable []

64. That payments for contract termination should not exceed an amount equivalent to two years of total annual remuneration and should not be paid until the company has been able to verify that the director has fulfilled all previously established criteria or conditions for payment.

For the purposes of this recommendation, payments for contractual termination will be considered to include any payments the accrual of which or the obligation to pay which arises as a consequence of or on the occasion of the termination of the contractual relationship between the director and the company, including amounts not previously vested of long-term savings schemes and amounts paid by virtue of post-contractual non-competition agreements.

Complies [X] Partially complies [] Explain [] Not applicable []

H. FURTHER INFORMATION OF INTEREST

1. If there is any significant aspect regarding corporate governance in the company or other companies in the group that has not been included in other sections of this report, but which it is necessary to include in order to provide a more comprehensive and reasoned picture of the structure and governance practices in the company or its group, describe them briefly below.

2. This section may also be used to provide any other information, explanation or clarification relating to previous sections of the report, so long as it is relevant and not repetitive.

Specifically, indicate whether the company is subject to any corporate governance legislation other than that of Spain and, if so, include any information required under this legislation that differs from the data required in this report.

3. The company may also indicate whether it has voluntarily subscribed to other ethical or best practice codes, whether international, sector-based, or other. In such case, name the code in question and the date on which the company subscribed to it. Specific mention must be made as to whether the company adheres to the Code of Good Tax Practices of 20 July 2010.

H.1.H FURTHER INFORMATION OF INTEREST

Bankia has a System of Corporate Governance approved by the Board of Directors and inspired by the Bankia Group's corporate values with respect to business ethics and corporate social responsibility: integrity, professionalism, commitment, proximity and focus on achievement.

This system is also underpinned by the principles of good governance assumed and developed by the Company in the Bankia Group Corporate Governance and Organisational Structure Policy, as regards internal governance, approved by the Company's Board of Directors based on the recommendations of the Good Governance Code of Listed Companies approved by the Board of the CNMV.

Bankia's System of Corporate Governance comprises a set of internal policies, standards and procedures in accordance with prevailing legislation and the scope of corporate autonomy supported therein, ultimately aimed at satisfying the corporate interest, understood as the common interest of all the shareholders of an independent, public listed company (sociedad anónima) focused on the profitable and sustainable pursuit of its objects and the creation of long-term value, which in the case Bankia entails a broad institutional and retail shareholder base.

Bankia's System of Corporate Governance comprises mainly (i) Corporate rules and regulations, (ii) Internal Procedures and Rules of Conduct and (iii) Corporate Policies.

(i) Corporate rules and regulations:

- Bylaws.
- General Meeting of Shareholders Regulations.
- Board of Directors Regulations.
- Audit and Compliance Committee Regulations.
- Appointments and Responsible Management Committee Regulations. - Remuneration Committee Regulations.

(ii) Internal rules of conduct and procedures:

The Company and the Group also have other internal procedures and rules of conduct that comply with regulatory and statutory requirements, or arise from good governance recommendations.

These include, among others, the following rules and procedures:

- Code of Ethics and Conduct.
- Internal Rules of Conduct for Securities Markets activities.

Said basic texts within the scope of the codes of conduct are developed and supplemented through other internal procedures and provisions addressing issues such as the prevention of money laundering and terrorist financing, the Customer Protection Rules of Bankia and its Group and the Whistleblowing Channel Regulations, all of which fall within the framework of Bankia's commitment to promoting an ethical corporate culture that complies with and encourages responsible behaviour at the Entity.

(iii) Corporate Policies:

These policies determine the general principles and guidelines that regulate the governing bodies, the duties, activities and processes of the Company and its Group, establishing a framework for action that offers legal certainty to the company and its Group. They are general in nature and are intended to be permanent. They were approved by the Board of Directors, taking into account the relevant legal requirements, such as good governance recommendations.

Specifically, Bankia's Corporate Governance System includes, inter alia, the following policies:

- Bankia Group Corporate Governance and Organisational Structure Policy.
- Internal Governance Policy.
- Policy on Information, Communication, Contacts and Involvement with Shareholders, Institutional Investors, Proxy Advisors and other Stakeholders.
- Policy on the Suitability of Directors, General Managers and other Key Function Holders at Bankia.
- Policy on the Selection, Diversity, Integration and Training of Directors.
- Bankia Senior Management Selection and Appointment Policy.
- Remuneration Policy for Directors, General Managers and Persons performing Senior Management Functions
- Risk Management and Control Policies.
- Investment and Financing Policy.
- Sustainable Management Policy.
- Dividend Policy.
- Treasury Shares Policy.
- Conflicts of Interest Policy.
- Regulatory Compliance Policy. - New Products Policy.

In 2020, the Board of Directors updated the corporate governance system and several policies; e.g., the Group Corporate Governance and Organisational Structure Policy, the Policy on the Suitability of Directors, General Managers and Other Key Function Holders, the Policy on the Selection, Diversity, Suitability, Integration and Training of Directors, the Senior Management Selection and Appointment Policy, and the Conflicts of Interest Policy.

H.2.- FURTHER INFORMATION OF INTEREST

The Company is not subject to any legislation other than Spanish law for corporate governance purposes.

MERGER WITH CAIXABANK

At their Extraordinary General Meeting held on 1 December 2020, the shareholders resolved to approve the merger by absorption of Bankia, S.A. into CaixaBank, S.A., with the termination of the absorbed company and the transfer en bloc of all of its assets and liabilities as a whole to the absorbing company, under the general terms of merger of 17 September 2020.

The effectiveness of the merger is subject to the following conditions precedent:

- (a) Authorisation by the Minister of Economic Affairs and Digital Transformation per the provisions of additional provision twelve of Law 10/2024 of 26 June 2014, on the organisation, supervision and solvency of credit institutions.
- (b) Authorisation by the National Markets and Competition Commission for the economic concentration arising as a result of the merger, per the provisions of Competition Law 15/2007 of 3 July 2007, and related legislation.
- (c) The absence of objections on the part of the Directorate-General for Insurance and Pension Funds, the CNMV and the Bank of Spain regarding the acquisition by CaixaBank, as a result of the merger, of significant shareholdings in companies subject to supervision by such bodies, be it by express declaration of the absence of objections, or due to the maximum period established in the applicable legislation elapsing without the relevant objections having been raised.
- (d) The absence of objections by the European Central Bank regarding the acquisition of significant shareholdings by CaixaBank, as a result of the merger, be it by express declaration of the absence of objections, or due to the maximum period established in the applicable legislation elapsing without the relevant objections having been raised.
- (e) Authorisation for or, as the case may be, the absence of objections by the relevant supervisory authorities (including, specifically, the European Central Bank, the Bank of Spain, the Directorate-General for Insurance and Pension Funds and the CNMV) o the acquisition by the future, post-merger shareholders of CaixaBank of significant indirect holdings in investees of CaixaBank subject to the supervision of such authorities.

SECTION C.1.16 (continued)

In the event that the Board of Directors proposes the removal of any external director before the end of the term for which the director was appointed under the Bylaws, the proposal must be explained and be supported by the relevant report of the Appointments and Responsible Management Committee. The Board of Directors will not propose the removal of any independent director before the expiry of that director's tenure as mandated by the Bylaws, except where the Board of Directors considers just cause to exist, after a report from the Appointments and Responsible Management Committee. The removal of independent directors may also be proposed as a result of a takeover bid, merger or similar corporate transaction entailing changes in the shareholder structure of the Company, where such changes in the structure of the Board are made in order to meet the proportionality criterion referred to in the good corporate governance recommendations.

Without prejudice to the foregoing, directors must place their directorships at the Board of Directors' disposal and, if the Board deems it appropriate, tender their resignation in the cases stated in article 23.4 of the Board of Directors Regulations, as described in section C.1.19 of this report.

SECTION C.1.30 (continued)

Contracting, rotation of appointment:

- Monitoring of contract expiry dates, signing of audit reports, submission of replacement options/tender in October. The selection process will be conducted according to the Procedure for selecting the external auditor in force from time to time.
- Verification of inclusion of the reference to rotation in the document provided by the external auditor describing the internal control policies and procedures designed and implemented at the audit firm (and at all firms in its network) with a view to ensuring strict compliance with the independence rules applicable to audit firms.

Fees and transparency:

- Monthly monitoring of the 70% limit on each new proposal submitted to the Audit and Compliance Committee. Additional control of amounts invoiced.
- Six-monthly reconciliation of billing recorded on Bankia's systems to proposals reviewed, accounting records and billing reported by the external auditor.
- Six-monthly review of billing for services provided to Bankia in proportion to the external auditor's total revenue.

Specific mechanisms established by the Company to safeguard the independence of financial analysts, investment banks and credit rating agencies:

Elsewhere, article 38 of the Board of Directors Regulations states that the Board of Directors will establish mechanisms for the regular exchange of information with institutional investors who are among the Company's shareholders, and that the relations between the Board of Directors and institutional shareholders may not result in delivery to such shareholders of information that could give them a privilege or advantage over other shareholders.

Article 36.5 of the Board of Directors Regulations states that the Board of Directors shall define, promote and publish on its website a policy for communication, contact and engagement with shareholders, institutional investors and proxy advisors that is fully consistent with the rules against market abuse and gives similar treatment to shareholders that are in the same position. The Board of Directors shall also define a general policy regarding the communication of economic-financial, non-financial and corporate information, through such channels as it may consider appropriate, that helps to maximise the dissemination and quality of information available to the market, investors and other stakeholders.

This policy is applicable to information and communications provided by the Company to financial analysts, investment banks and rating agencies. In the case of financial analysts, regulatory compliance recommendations are adhered to. In the case of investment banks, where they are advisors to the Bank, the relationship is governed by non-disclosure agreements and all parties involved are included on the lists of insiders as applicable in accordance with prevailing law. In the case of rating agencies, the relationship is governed by non-disclosure agreements. Credit rating agency analysts are subject to the specific regulations of the ESMA (European Securities and Markets Authority) that apply to them.

In this respect, the Policy of Information, Communication, Contacts and Engagement with Shareholders, Institutional Investors and Proxy Advisors and other Stakeholders approved by the Board of Directors and which forms part of the Company's corporate governance system, aims to engage and encourage permanent dialogue with each of the Company's stakeholders, particularly its shareholders, institutional investors and proxy advisors, in order to generate stable and sound relations and promote transparency within the framework of corporate interest, acting in accordance with the following principles: (i) transparent communication, (ii) ongoing information and dialogue, (iii) equal treatment and non-discrimination, (iv) commitment and integrity in the dissemination, communication and management of corporate information, (v) innovation, sustainability and development in the use of new technologies, and (vi) compliance with the law and the corporate governance system. SECTION C.2.1. (continued)

FUNCTIONS OF THE RISK ADVISORY COMMITTEE (continued)

The Risk Advisory Committee will perform the following functions:

- a) Advise the Board of Directors on the Company's general propensity to risk, now and in the future, and its strategy in this respect, and assist the Board in overseeing the implementation of that strategy. Nevertheless, the Board of Directors will have ultimate responsibility for the risks taken by the Company.
- b) Ensure that the pricing of the assets and liabilities offered to customers takes the Company's business model and risk strategy fully into account. Where this is not the case, the Risk Advisory Committee will present the Board of Directors with a plan to remedy the situation.
- c) Determine, together with the Board of Directors, the nature, quantity, format and frequency of the risk reports the Risk Advisory Committee and the Board of Directors are to receive.
- d) Collaborate to establish rational remuneration policies and practices. For this purpose, without prejudice to the functions of the Remuneration Committee, the Risk Advisory Committee will monitor the incentives provided for in the remuneration system to ensure that it gives proper consideration to risk, capital, liquidity and the probability and timing of profits.

- e) Present risk policies to the Board of Directors.
- f) Propose the Company's and the Group's risk control and risk management policy to the Board of Directors through the Internal Capital Adequacy Assessment (ICAAP) Report, which must identify in particular:
 - The various types of financial and non-financial risks (including operational, technological, legal, social, environmental, political and reputational risks and risks relating to corruption) facing the company and the Group, including among the financial or economic risks contingent liabilities and other off-balance sheet risks.
 - The report on the level-based risk management and control model, which will include the Risk Advisory Committee itself.
 - Internal control and information systems to be used in order to control and manage the aforementioned risks, including contingent liabilities or off-balance sheet risks.
 - The level of risk that the Company considers to be acceptable.
 - Measures in place to mitigate the impact of the risks identified in the event that they should materialise.
- g) Present to the Board of Directors proposals concerning:
 - The approval of policies for assumption, management, control and reduction of risks to which the Company is or may be exposed, including those arising from the macroeconomic environment in relation to the current stage of the economic cycle.
 - The approval of the general internal control strategies and procedures, on the status of which it periodically will be advised.
 - Periodic reports on the results of verification and control functions undertaken by the Company's units.
- h) Periodically monitor the loan portfolio of the Company and the Group to make proposals to the Board of Directors on control of matching the risks taken to the established risk profile, paying particular attention to the main customers of the Company and Group and the distribution of risk by sector of activity, geographical area and risk type.
- i) Periodically check the systems, processes, assessment methods and criteria for approving transactions.
- j) Make proposals to the Board of Directors for the assessment, monitoring and implementation of instructions and recommendations issued by supervisory bodies in the exercise of their function and, where applicable, refer to the Board of Directors any proposals for actions to be taken, while following the instructions received.
- k) Verify that the Company's risk reporting processes are appropriate for managing the risks taken and, where appropriate, propose any improvements that may be considered necessary to correct them.
- l) Make proposals to the Board of Directors in relation to the Company's credit risk authority framework.
- m) Supervise the internal control and risk management function. The officer in charge of this function shall provide the Committee, at the end of each year, with a report on activities, evaluating whether the risk unit has the processes, technical resources and personnel necessary for proper performance of its duties in an independent manner, consistent with the Company's risk profile.

In particular, the Risk Advisory Committee shall supervise the functions of the risks unit with respect to:

- Ensuring the proper functioning of the risk management and control systems and, in particular, that they adequately identify, manage and quantify all material risks affecting the Company.
- Actively participating in drawing up the risk strategy and in important decisions regarding risk management.
- Ensuring that the risk management and control systems adequately mitigate risks as defined by the policy laid down by the Board of Directors.

APPOINTMENTS AND RESPONSIBLE MANAGEMENT COMMITTEE (CONTINUED)

To perform its functions more effectively, the Committee may use whatever resources it considers appropriate, including taking advice from outside professionals in matters within its remit, ensuring suitable alignment of interests and scrutinising, at the time of engagement, any potential conflicts of interest that might exist. The Committee shall receive adequate funds for this purpose and shall submit to the Board for approval an annual budget, or alternative mechanisms.

If advisors are retained to assist the Committee in its selection, appointment and assessment roles, they shall be different from any advisors who might assist the Remuneration Committee in its remuneration policy work. The above is subject to the principle of proportionality and the specific circumstances of each case.

The Committee shall record any potential conflict of interest affecting the external advisors, the detail of the fees earned by each advisor over the year and the measures and actions taken to safeguard their independence. External advisors shall be required to disclose in their service provision proposals any conflicts of interest they may have with the Company, with the directors or with potential candidates for Chairman, CEO or director.

In the performance of its duties, the Appointments and Responsible Management Committee shall take into account, inasmuch as possible and on a continuing basis, the need to ensure that the Board of Directors' decision-making is not dominated by one individual or by a small group of individuals such as could harm the interests of the Bank as a whole.

ACTIONS:

In 2020, the Appointments and Responsible Management Committee's key actions focused on:

-Annual verification of the status of directors: The Committee verified the status of directors and was briefed on business relations between the Bank and the independent directors. Such relations are disclosed in the annual corporate governance report.

-Reports on appointments: In 2020, the Committee submitted reports and proposals to the Board of Directors for the appointment and ratification of directors and their specific positions, and regarding senior management. It also reported on the re-election of the Chief Executive Officer, the renewal of the members of the Board Committees, the appointment of a new independent director and the creation and composition of the Technology and Innovation Committee as well as the appointment of the Chief Risk Officer (CRO).

-Policy for the selection of directors and senior managers: In 2020, the Committee reported favourably on the proposal to update the Policy on the Suitability of Directors, General Managers and Other Key Function Holders at Bankia and the Policy on the Selection, Diversity, Integration and Training of Directors, and on the proposal to update the Senior Management Selection and Appointment Policy.

The Committee was briefed on the annual verification of compliance with the Policy on the Suitability of Directors, General Managers and Other Key Function Holders at Bankia, the Policy on the Selection, Diversity, Integration and Training of Directors, and the Senior Management Selection and Appointment Policy. The Committee was informed at several meetings of the steps taken to meet the gender diversity target and of the start of the process of assessing the suitability of the selected female candidates.

-Assessment: The Committee was briefed on the commencement of the suitability assessment in respect of both members of the Board of Directors and key function holders, as the body responsible for assessing the suitability of directors and senior executives and for proposing updates to the Group's Suitability Manual. The Committee was also informed of the membership of the management bodies of Group companies and the suitability of their members. The Committee was briefed on the evaluation by an external expert of the effectiveness of the Board and its Committees, and on the specific performance assessments of the Chairman and the Chief Executive Officer.

-Responsible Management: In 2020, the Committee reviewed, monitored and evaluated the Responsible Management Policy and Plan and the update to the Responsible Management Policy. It was briefed on the sponsorship and social action policy, with details of the changes as regards social investment and key indicators for 2019. Bankia's Responsible Management Plan is monitored every six months by the Committee. The Committee was also briefed on the Sustainable Management Framework and the application of ESG (environmental, social and corporate governance) Criteria, on the results of the assessments by ESG analysts who evaluate Bankia's performance in this regard, on the proposed review of the Policy on the Protection of and Respect for Human Rights and the activity report of the Ethics and Conduct Committee, as well as on the renewal and monitoring of the Conventions Policy and the monitoring of Sustainable Development Goals.

-Succession plans: The Committee was informed of the Company's succession plans and their updates, which are intended to ensure the continuity of the business and its leadership.

-Annual Board Training Plan and New Directors Orientation Plan: The Committee was briefed on the Board Training Cycle Survey, the purpose of which was to gather the opinions of directors on the training cycle offered in 2019. In this regard, Directors were required to answer questions in the following areas: Content, Methodology, Summary and Comments/Suggestions: The Committee was also informed of the new independent director's progress with the New Directors Orientation Plan.

-Merger with CaixaBank: As regards governance matters, the Appointments and Responsible Management Committee held a specific meeting to analyse the governance structure resulting from the general terms of merger with CaixaBank S.A.. Among other issues, it analysed the composition of the future Board of Directors of the post-merger entity, the executive chairmanship, the chief executive status of the Chief Executive Officer and the remuneration systems to be applied at the post-merger entity to executive directors, senior executives and other categories of staff whose professional activities have a significant impact on the entity's risk profile. It was also briefed on the content of the Directors' Report concerning the draft terms of merger.

-Other activities in 2020: Report on the members of staff forming the Identified Personnel group in 2020, the assessment to determine the Identified Personnel for 2020, as well as any changes in relation to the criteria for establishing this group. It was also briefed on the monitoring of reputational risk (2019), the contracts of the members of the Management Committee, the Bankia Group's consolidated non-financial information statement, the Bankia labour agreement and the sector-specific collective bargaining agreement and the aspects of the Annual Corporate Governance Report falling within its area of authority, among other activities, as well as on the policy concerning personnel rendering real estate mortgage/loan services.

The Appointments and Responsible Management Committee produces a detailed annual activity report. The report is made available to shareholders when the General Meeting of Shareholders is called and can be accessed on the corporate website (www.bankia.com).

FUNCTIONS OF THE APPOINTMENTS AND RESPONSIBLE MANAGEMENT COMMITTEE (CONTINUED)

The Appointments and Responsible Management Committee will have general authority to propose and report on the appointment and removal of directors and senior executives. In particular, without prejudice to other tasks assigned to it by the Board, the Appointments and Responsible Management Committee shall have all the functions assigned to it by applicable legislation and, in particular and without limitation, the core responsibilities under Chapter III of the Committee Regulations, including:

- a) Assess the competencies, knowledge, skills, diversity and experience required of the Board of Directors and, in light of that assessment, define the roles and capabilities required of the candidates to fill each vacancy, and estimate the time and commitment that will be needed for them to perform their duties effectively, ensuring that non-executive directors have sufficient time available to discharge their responsibilities effectively;
- b) Identify candidates and make recommendations and proposals to the Board of Directors for the appointment of independent directors by co-optation or, if applicable, by vote of the General Meeting of Shareholders, and make proposals for the re-election or removal of such directors by the General Meeting;
- c) Identify candidates, make recommendations and submit reports to the Board of Directors on proposals for the appointment of the remaining directors by co-optation or by vote of the General Meeting of Shareholders, and make proposals for their re-election or removal at the General Meeting;
- d) At the request of the Chairman and on a non-binding basis, inform on Board resolutions concerning the appointment or removal of senior executives of the Group and the basic terms and conditions of their contracts, without prejudice to the powers of the Remuneration Committee with regard to remuneration, and conduct regular reviews of the Board's Policy concerning the selection and appointment of the Group's senior management, offering recommendations;
- e) Examine and update the succession plans for the Chairman, the Deputy Chairman and, as the case may be, the Chief Executive Officer and senior executives of the Company and, where appropriate, submit proposals to the Board of Directors with a view to ensuring an orderly, planned succession;
- f) To safeguard the independence, impartiality and professionalism of the Secretary and Assistant Secretary of the Board of Directors, submit reports on their appointment and removal for approval by the full Board;
- g) Set a target for the level of representation of the least-represented gender on the Board of Directors and draw up guidelines on how to increase the number of persons of the least-represented gender so as to meet that target. The Committee will also take steps to ensure that the selection procedures used to fill vacancies do not contain implicit biases that prevent the selection of persons of the least-represented gender;
- h) At regular intervals and at least once a year, assess the structure, size, composition and performance of the Board of Directors, making recommendations to the Board in respect of possible changes;
- i) At regular intervals and at least once a year, assess the suitability of the various members of the Board of Directors and of the Board as a whole and report the results to the Board;
- j) Report to the Board of Directors on issues of good corporate governance concerning matters falling within the Committee's remit (objectives, talent management, liability insurance, etc.) and make proposals for improvement;
- k) Propose the board diversity policy and director selection policy to the Board of Directors and run an annual check on compliance with the policy;
- l) Without prejudice to the responsibilities assigned to the Audit and Compliance Committee, the Ethics and Conduct Committee will submit to the Appointments and Responsible Management Committee periodically, and at least at the end of each year, a report on activities in relation to the performance of the duties assigned to it and, in particular, on the oversight and monitoring of the Code of Ethics and Conduct;
- m) Periodically evaluate and review the Company's corporate social responsibility and environmental and social sustainability policy, with a view to ensuring that they fulfil their purposes of promoting the interests of society and take account, as appropriate, of the legitimate interests of other stakeholders.
- n) Supervise the Company's environmental and social practices to ensure that they are in alignment with the established strategy and policies.
- o) Supervise and evaluate the way in which relations with the various stakeholders are handled. Specifically, the Chairman and other Committee Members, along with the lead director, shall be involved in communication and contacts with shareholders and institutional investors, above all with those not represented on the Board. The Committee will also be involved with proxy advisors and shall liaise between all of the above stakeholders and the Board, sounding them out them on specific matters, particularly matters relating to corporate governance, and may also involve them in the improvement of any aspect. In any event, the Board will authorise these contacts and establish the basic outline of any messages to be conveyed, which may on no account include privileged information and it shall be informed of any matters dealt with.

The duties and responsibilities of the Appointments and Responsible Management Committee are set out in Article 15 of the Board of Directors Regulations, and are further implemented by the Appointments and Responsible Management Committee Regulations. Both sets of regulations are available at the corporate website (www.bankia.com).

REMUNERATION COMMITTEE (continued)

The Committee shall record any potential conflict of interest affecting external advisors, the detail of the fees earned by each advisor over the year and the measures and actions taken to safeguard their independence. External advisors shall be required to disclose in their service provision proposals any conflicts of interest they may have with the Company, with the directors or with potential candidates for Chairman, CEO or director.

ACTIONS:

In 2020, the Remuneration Committee's key actions focused on:

-Director and senior executive remuneration policy: in 2020, the Committee performed the periodic review of the remuneration policy applicable to directors and senior executives and was briefed on the report prepared by the independent expert on the evaluation of the 2019 Bankia Remuneration Policy and its compliance with the legislation in force on remuneration. As regards remuneration, the Committee was briefed on the resolutions of the 2020 General Meeting of Shareholders regarding the variable remuneration of directors, the request for authorisation to pay the variable remuneration for 2016 to executive directors and senior management, the accrual of the variable remuneration for 2018, the request for variable remuneration for 2019, the multi-year variable remuneration for 2020, the information on remuneration contained in the 2019 annual reports, the variable remuneration for Retail Banking and the amendments to the remuneration regulations. It was also briefed on the analysis of the Remuneration Policy and its alignment to the Risk Appetite Framework (RAF) and equal pay for men and women.

-2019 Annual Report on Directors' Remuneration and Annual Corporate Governance Report: The Committee reported favourably on the 2019 Annual Corporate Governance Report regarding matters falling within the scope of its authority and on the 2019 Annual Report on Directors' Remuneration.

-Other activities: In 2019, the Committee was briefed, among other matters, on the identities of and updates to the Identified Personnel, the proposed targets for 2020, the appointment of corporate managers, the contract of the Chief Executive Officer upon his proposed re-election, residential mortgage financing, and remote working.

The Remuneration Committee produces a detailed annual activity report. The report is made available to shareholders when the General Meeting of Shareholders is called and can be accessed on the corporate website (www.bankia.com)).

FUNCTIONS OF THE REMUNERATION COMMITTEE (continued)

In addition to any other tasks assigned to it by the Board, the Remuneration Committee has general powers to report on and propose remuneration for directors and senior executives. In particular, and without limitation, the Committee shall have the powers under Chapter III of its Regulations, which include:

-Submitting proposals to the Board of Directors for the policy on the remuneration of directors and general managers or senior managers who report directly to the Board, executive committees or the CEO, as well as the individual remuneration and other contractual terms of executive directors, and oversee compliance;

-Reporting on senior management remuneration. Overseeing the remuneration of the heads of Internal Audit, Risks and Compliance;

-Periodically reviewing the Company's remuneration programmes, assessing their appropriateness and effectiveness, the remuneration policy applied to directors and senior executives, including share-based remuneration systems and their application, and ensuring that their individual compensation is proportionate to the amounts paid to other directors and senior executives in the Company;

-Ensuring transparency in remuneration and the inclusion of information about directors' remuneration in the annual report on directors' remuneration and the annual corporate governance report, submitting such information as may be necessary to the Board for that purpose;

-Verifying compliance with the Company's remuneration policy.

-Submitting proposals to the Board on any remuneration decisions to be made by the Board, including those that may have an impact on risk and the Company's risk management, taking the long-term interests of shareholders, investors and other stakeholders into account, as well as the public interest, all this without prejudice to the functions assigned to the Risk Advisory Committee in this matter;

-Making sure that potential conflicts of interest do not undermine the independence of external advice given to the committee.

-Verifying the information on remuneration of directors and senior managers contained in the various corporate documents, including the annual report on director remuneration, to which end it will submit a report to the Board of Directors.

The duties and responsibilities of the Remuneration Committee are set out in Article 15 bis of the Board of Directors Regulations, and are further implemented by the Remuneration Committee Regulations. Both sets of regulations are available at the corporate website (www.bankia.com).

FUNCTIONS OF THE BOARD RISK COMMITTEE (continued)

The Board Risk Committee shall have the following functions, among others:

- a) To make decisions within the scope of the powers delegated to it by the Board of Directors in risk matters specifically provided for in the Board's current delegation resolution.
- b) Within the scope of its authority, to set the overall pre-classification limits for account holders or customer groups in relation to exposures by risk class.
- c) To report to the Board of Directors on risks that may affect the Company's capital adequacy, recurring results, operations or reputation.
- d) With respect to the approval of risk types other than credit risk, the powers of the Board Risk Committee will be those delegated to it by the Board of Directors at any given time.

TECHNOLOGY AND INNOVATION COMMITTEE (Continued)

ACTIONS:

Regarding the main actions carried out since its creation on 27 May 2020 and the close of year 2020, the Technology and Innovation Committee advised the Board of Directors on the following key matters:

- Digital Transformation: objectives and structure of the Digital Transformation and Strategy, the Digital Transformation Plan and reflections with respect to 2021.
- Technology and operations 2020: Technology and Operations presentation, IT 2020, 2020 Projects Plan, Transformation of IT and Operations, Annex, Core Banking transformation strategies.
- The road towards innovation as a culture: the aim of which is to give a comprehensive view of the role of innovation at Bankia and its lines of future development.

AUDIT AND COMPLIANCE COMMITTEE (CONTINUED)

ACTIONS:

In 2020, the Audit and Compliance Committee's key actions focused on:

- Financial and non-financial reporting and related internal control mechanisms: In 2020, the Committee oversaw the preparation and fairness of the Company's separate and consolidated financial statements, as well as the key business figures and the Bankia Group's consolidated non-financial information statement. It was informed of the proposal to update the Accounting Policies Manual with a view to bringing it into line with the latest legislative developments. Moreover, over the year, the Committee regularly oversaw the effectiveness of the Company's internal control, internal audit and risk management systems and, in particular, the system of Internal Control over Financial Reporting (ICFR) and the Internal Control over Non-Financial Reporting (ICNFR) Policy. The Committee was briefed on the activities of the Ethics and Conduct Committee and the Whistleblowing Channel and their updated Regulations. It was also briefed on the proposed 2020-2022 Financial Plan, as well as the report on the observations concerning the key accounting impacts of Covid-19; the monitoring of contingencies, the report on the recoverability of deferred tax assets (DTAs), the report on the supervision of Bankia, S.A.'s dividends policy during 2019, the report on variations in legal and tax contingencies and the current status of the Action Plans concerning the Deposit Guarantee Fund Stress Test.
- Regulatory compliance: The Committee is the oversight body for the compliance risk control systems and monitors the Compliance function. The Committee was informed of the progress of the Annual Compliance Plan for 2019, and the 2019 Annual Compliance Report. The Committee was briefed on the progress of compliance control activities, including: activity reports on criminal risk and the updating of Bankia's Crime Prevention Policy, the prevention of money laundering and terrorist financing and reports by external experts. Reports on the Internal Rules of Conduct in the Securities Market, compliance with the Market Abuse Prevention Policy, personal data protection and the proposed modifications to the data protection governance model and policy, as well as the amendment to the Bankia Group's Compliance Model, with briefings on processing and reporting to the Chief Data Officer. The report on essential outsourcing, the Conflicts of Interest Policy and the related modifications, on notifications and inspections by the supervisory authorities, the periodic reports on investment services and reviews of the Treasury Stock Policy, the Policy on Commercial Communications and Algorithmic Trading, the reports on non-subject related-party transactions, the proposed review and update of the Document on Criteria, Related-Party Transactions and Credit Facilities, the 2019 Annual Compliance Report and specific activity reports and the proposed PBC-FT/Comex Action Plan, the Pension Plan Commercialisation Policy and the Compliance Training Plan, and progress with the Economic Systems Development for Compliance, as well as actions under the 2020 Action Plan.
- Corporate governance: The Committee oversaw the effectiveness of and compliance with governance rules and procedures, review and updating of the Company's Corporate Governance System and Corporate Policies, the 2019 Corporate Governance Report, the suitability of the content that the Board of Directors must include in annual public documentation, the proposed amendment to the Shareholders' Meeting Regulations in order to include, where applicable, the core principles of Directive (EU) 2017/828, certain provisions concerning recent legislative reforms, certain aspects in line with best good governance practices and certain technical specifications. Moreover the Committee resolved to report favourably on the proposed amendment to the Board Regulations, introducing article 14 bis regulating the Technology and Innovation Committee. It was also briefed on the reform to the Code of Good Governance at Listed Companies approved by the CNMV on

26 June 2020, and on the update to and supervision of the Corporate Governance System in the first half of 2020 (corporate governance management).

-Related-party transactions: In 2020, the Committee reported on related-party transactions involving members of the Board and transactions with significant shareholders, supervised the Framework Agreement between Bankia and BFA and was briefed on the proposed modification of the BFA-Bankia recovery services agreement, to this end drawing on the reports of several external experts. The Committee was also informed of the non-subject related-party transactions in 2019.

-Risk management and control: Within its sphere of concern, the Committee took part in the management and control of the Bank's risks, supervising risk management systems in the financial reporting process, including tax risks. The Committee also evaluated the Company's regulatory and litigation risks and was briefed on Bankia's Investment and Financing Policy over the year and the preliminary conclusions of the 2019 report on protection of customer assets. As part of its risk management and control duties, in 2020 the Committee held two joint meetings with the Risk Advisory Committee.

-Internal audit activity: Bankia's Corporate Internal Audit Department reports to the Audit and Compliance Committee. The Chairman of the Committee may approach the department at any time to request information on its activities. In this regard, the Committee was briefed on the progress of the internal audit in respect of the fourth quarter of 2019 and the Annual Report on the 2019 Audit Plan, the evaluation of the effectiveness of and compliance with Bankia's governance rules and procedures, the annual evaluation of the functioning of the internal audit unit, as well as the 2021 Audit Plan and the budget and proposed funds for the above unit in 2021. Furthermore, the Committee received monthly reports on the independence of the external auditors, on the reviews associated with the appointment of the external auditor and the follow-up report on the external auditor's recommendations. It was also informed of the Proposed New Criteria for the Reformulation of Recommendations (February/2020), the report on the profiles of the internal audit team and the report on the Covid-19 Financial Transactions Oversight Office. The Committee was also briefed on the review of the Internal Audit Regulations and Policy, as well as the 2020 report on Compliance with the Policy and Regulations.

-External audit: in line with the External Auditor Selection Policy, the Committee was briefed at several meetings on the process for reviewing the appointment of the external auditor for the coming years, a process that began in 2019. Following the reviews and analyses conducted, the Annual Shareholders' Meeting of 27 March 2020, at the proposal of the Audit and Compliance Committee, approved the appointment of KPMG Auditores, S.L. as the auditor of Bankia, S.A. and its consolidated group in 2020, 2021 and 2022. The external auditors (both outgoing and incoming) were invited to attend 7 meetings of the Committee in 2020, at which they confirmed their independence, presented the conclusions of the audit of the 2019 financial statements and the planning, scope and conclusions of the audit engagement as at 30 June 2020 and the financial statements for 2020. The Committee verified the fees paid to the external auditor for its engagements. The Committee received written confirmation from the external auditor of its independence from the Bankia Group and from entities directly or indirectly related to the Bank. The outgoing external auditor also presented the Committee with a report supplementing the audit report and the 2019 annual report on customer asset protection. The current auditor also provided the Committee with the strategy and planning for the audit of the individual and consolidated annual accounts at 31 December 2020.

-Follow-up to the Committee's action plans: The Audit and Compliance Committee received reports throughout 2020 on the schedule of planned and recurring matters to be examined, and regularly followed up action plans, meeting on a monthly schedule, in addition to ad hoc meetings convened as appropriate over the year.

-Other activities: in 2020, the Committee analysed and supervised, inter alia, the following matters: tax information, the dividends policy, treasury share transactions, policy on powers of attorney, registration documents and issuance programmes, documentation relating to the 2019 year-end, the annual report of the Customer Service Department, the annual report on the corporate website, the 2019 report on essential outsourcing and the proposed amendment to Bankia's Board Regulations, introducing article 14 bis regulating the Technology and Innovation Committee, as well as Judgment 13/2020 of 29 September 2020, of Panel 4 of the Criminal Chamber of the National Appellate Court /Bankia Flotation" (Abbreviated Proceedings 1/2018). Moreover, the Committee was regularly informed of the planned merger between Bankia, S.A. (as the absorbed company) and CaixaBank, S.A. (as the absorbing company). The Committee was also informed of the updates to the Cybersecurity Policy and Regulations and the Bankia Group's Procurement Policy.

In 2020, the Bank did not create or acquire shares in special purpose vehicles or entities domiciled in countries or territories listed as tax havens. Therefore the Audit and Compliance Committee did not report to the Board of Directors on this matter.

The Audit and Compliance Committee produces a detailed annual activity report. The report is made available to shareholders when the General Meeting of Shareholders is called and is accessible on the corporate website (www.bankia.com).

FUNCTIONS OF THE AUDIT AND COMPLIANCE COMMITTEE (Continued)

Without prejudice to any other tasks that may be assigned to it by the Board of Directors, and in accordance with article 14 of the Board of Directors Regulations and the Audit and Compliance Committee Regulations, the Audit and Compliance Committee has all the functions assigned to it under applicable law and, in particular and without limitation:

- a) Reporting to the General Meeting on issues that fall within its remit and, in particular, on the audit findings, explaining how the audit has contributed to the integrity of the financial information and the Committee's role in this process.

- b) Overseeing the effectiveness of internal control at the Company, seeking to ensure that the internal control policies and systems in place are effectively applied in practice, internal audit, regulatory compliance, the systems in place to manage and control both financial and non-financial risk at the Company and the Group, and discussing with the statutory auditor any material weaknesses in the internal control system that may have been detected in the audit, without jeopardizing its independence. To this end, where appropriate the Committee may make recommendations or submit proposals to the Board of Directors, along with the related follow-up period.
- c) Supervising and assessing the preparation and filing of regulatory financial and non-financial information and making recommendations or submitting proposals to the Board of Directors to safeguard the integrity of the financial information.
- d) Making recommendations to the Board of Directors for the selection, appointment, re-election and removal of the statutory auditor, and overseeing the selection process in accordance with EU legislation and the terms and conditions of engagement.
- e) Establishing appropriate relations with the external auditors so as to receive information on matters that could jeopardize the external auditor's independence, so that they may be examined by the committee, and on any other matters arising from the auditing of the Company's accounts and, as appropriate, authorising the services permitted under the terms of EU legislation and regulations regarding independence, and making any other disclosures required under applicable legislation and auditing standards. In any event, the Committee must also receive an annual statement from the external auditor certifying its independence in relation to the Company or entities directly or indirectly related to it, as well as detailed information about any additional services of any kind provided and the fees received from these entities by the external auditor, or by individuals or entities related to it, in accordance with the laws on auditing.
- f) Issuing a report each year, prior to the release of the auditor's report, expressing an opinion on whether the independence of the external auditor or audit firms has been compromised. This report must contain a reasoned assessment of any additional non-audit services provided, considered individually and in the aggregate, other than the statutory audit and in relation to the auditors' independence and compliance with auditing standards.
- g) Examining and supervising compliance with the Board of Directors Regulations, the internal regulations on the Company's conduct in securities markets, the anti-money laundering manuals and procedures and, in general, the Company's governance and compliance rules, making the necessary proposals for improvement thereof, while seeking to ensure the corporate culture is in line with their purpose and values.
- h) Reporting to the Board on the creation or acquisition of shares in special purpose vehicles or entities resident in countries or territories classified as tax havens, and any other transactions or operations of a comparable nature the complexity of which could impair the transparency of the group.
- i) Reporting in advance to the Board of Directors on any matters within its remit under the law, the Bylaws or the Board Regulations.
- j) Any other functions which have been assigned to it, or for which it has been granted authority, by the Board.

The Audit and Compliance committee will also report to the Board on related-party transactions, before the Board makes any decision in this respect.

The Audit and Compliance Committee must be kept abreast of any corporate and structural changes planned by the company in order to perform an analysis and draw up a prior report to the Board of Directors on the economic conditions and accounting implications and, in particular, any exchange ratio involved.

The duties and responsibilities of the Audit and Compliance Committee are set out in Article 14 of the Board of Directors Regulations, and are further implemented by the Audit and Compliance Committee Regulations. Both sets of regulations are available at the corporate website (www.bankia.com).

SECTION E.1 (CONTINUED)

The Board of Directors of the Company has a permanent commitment to ensuring that the risk control and management model, especially with regard to crime prevention, prevents or minimises the probability of irregular practices and ensures, when any such conduct is detected, that it is stopped and the persons responsible are brought to account, to the strictest standards. The Audit and Compliance Committee takes the above into account as part of its role of monitoring the effectiveness of internal control and internal audit, in accordance with the criteria of the supervisory bodies, notwithstanding, in any event, the mandatory disclosures to the markets via the Non-Financial Information Statement (NFIS) and this Annual Corporate Governance Report.

Tax risk:

Tax risk control was first implemented in 2015 and the associated process describing this control is documented. All transactions approved by Centralised Committees or Governing Bodies are backed, where necessary, by an opinion from Tax Advisory or, in its absence, a certified, external tax advisor. This is also required by the New Products Committee for the launch of each new product or service. For the remaining Committees, the groups responsible for making proposals must verify whether a tax opinion has been issued if so required in accordance with the established criteria.

Work will continue on the activities envisaged in the Entity's control process in 2020.

SECTION E.2. (CONTINUED)

g) Contingency Committee: This committee meets quarterly. Its duties include identifying, monitoring and measuring legal and tax contingencies, analysing their probability of occurrence and adopting mitigation measures, as well as analysing the sufficiency of the provisions set aside for the contingencies.

h) Global Risk Control and Oversight Committee: Its risk-related functions include controlling, overseeing and effectively evaluating trends in the Group's risk profile, the risk appetite approved by the Board of Directors, and the business model from a holistic and forward-looking perspective, analysing any deviations affecting the Group's risk profile, solvency and/or liquidity, proposing, where necessary, any measures considered appropriate.

i) Regulatory Compliance Committee: This committee meets monthly. Its risk-related duties mainly include identifying, assessing and managing compliance risks associated with the Group's operations; updating and managing codes of conduct; and drafting, maintaining and overseeing compliance manuals and policies.

j) Operational and Technological Risk Committee: Its functions related to risk include awareness of the Group's operational risk profile through a qualitative self-assessment, analysing actual operational losses and monitoring of various indicators. It must also propose the annual framework of appetite and tolerance to operational and technological risk and approve the implementation of specific policies and procedures affecting the field of operational and technological risk.

k) Cyber Security Committee: Its functions include monitoring the status of cybersecurity and reporting regularly to the Board of Directors. In addition, its competencies include strategic decision-making on cyber security investments.

SECTION E.6 (CONTINUED)

Operational risk. In 2013, the Entity chose the standardized approach for calculating its capital requirements, subsequently making improvements in operational risk management on several fronts, including the real loss database and the extension of the self-assessment to all Group companies.

For the follow-up of this risk, the Entity has in place management policies and procedures which allow it to identify, measure, monitor and control the operational risks of the Entity.

Bankia's operational risk management objectives are to foster a culture of operational risk management that is particularly geared to raising risk awareness, assuming responsibility for and a commitment to service quality, and to ensuring that operational risks are identified and measured in order to prevent possible damages that could affect results.

Bankia performs Operational and Technological Risk Management that not only covers the recognition of loss-generating events and the accounting thereof, but also promotes their control, in order to minimize their potential negative effects through the continuous improvement of processes and the reinforcement of operational controls.

Operational and Technological Risk Management must be implemented throughout the entity to contribute to the realisation of the institutional objectives, through the management, prevention and mitigation of associated risks.

Reputational risk: The entity has procedures in place that enable it to identify, measure, monitor and control its reputational risks. Based on these policies, the entity is able to identify and quantify this type of risk and to identify potential additional sources of reputational risk.

Tax risk. Tax risk control was first implemented in 2015 and the associated process is documented.

All transactions approved by Centralised Committees or Governing Bodies are backed, where necessary, by an opinion from Tax Advisory or, in its absence, a certified, external tax advisor. This is also required by the New Products Committee for the launch of each new product or service. For the remaining Committees, the groups responsible for making proposals must verify whether a tax opinion has been issued if so required in accordance with the established criteria.

SECTION G.6

The Company publishes the reports indicated in the recommendation sufficiently in advance of the General Meeting of Shareholders.

In particular, the Audit and Compliance Committee's annual report includes the information on auditor independence, related-party transactions and the functioning of the Audit and Compliance Committee.

SECTIONS G.37 AND G.38

The Bylaws and the Board of Directors Regulations provide for possibility of creating an Executive Committee. However, one has not been set up and no members have been appointed. Therefore, in accordance with article 45 of the Bylaws, where no Executive Committee is constituted, the Board of Directors will retain its authority.

SECTION G.62

The General Shareholders' Meeting of 22 March 2019 approved the Director Remuneration Policy, with a deferral of the annual variable remuneration of 6 years, and partial payments in the final three years of deferral. The variable multi-year remuneration is deferred over a 5-year period as from the accrual of the conditional remuneration granted.

With respect to the prohibition on directors from transferring the shares granted until at least three years have elapsed, in the case of Bankia, while the holding period is one year as from the date on which the shares are delivered to the directors, given the specific limitations and conditions for the accrual, payment and deferral of the remuneration of Bankia's executive directors, the above period is extended to at least 4 years. In other words, as from the date on which the number of shares is determined, plus the one-year holding period as from the effective date of delivery, at least 4 years must elapse before such executive directors may transfer their shares.

2020 was the first year in which the executive directors received the shares in respect of the 2016 annual variable remuneration, since they had expressly waived such shares in previous years, and such shares are therefore retained and may not be transferred until 2021.

H.3.- FURTHER INFORMATION OF INTEREST

Institutional initiatives to which Bankia has signed up:

- Code of Best Tax Practices of the Spanish Tax Authorities (CBPT). In 2016, the Board of Directors of Bankia resolved to sign up to the Spanish Tax Authorities' Code of Best Tax Practices (CBPT). The Code of Best Tax Practices contains recommendations, which are undertaken voluntarily by the Spanish Tax Authorities and signatory companies, to enhance the enforcement of the Spanish tax system by increasing legal certainty, mutual cooperation based on good faith and legitimate trust between the Tax Authorities and companies, and the implementation of responsible tax policies at companies with the knowledge of the Board of Directors.

Sign-up date: 31 March 2016.

- The Code of Best Practices for the viable restructuring of loans secured by mortgages over normal residences. Signing up to the Code is voluntary and implies accepting a series of mechanisms designed to enable the restructuring of mortgage loans of borrowers experiencing extraordinary difficulties in meeting their payment obligations, as set forth in Royal Decree-Law 6/2012, of 9 March, on urgent measures to protect mortgagors without funds.

Sign-up date: 10 April 2012.

- Social Housing Fund. Created pursuant to an agreement spearheaded by the Ministry of Economy and Competitiveness Ministry, the Ministry of Health, Social Services and Equality, the Ministry of Development, and the Bank of Spain, the Spanish Federation of Towns and Provinces (FEMP), the Third Sector Platform (non-governmental organisations), the banking employers' association and 33 credit institutions. The Social Housing Fund provides housing to families in a particularly vulnerable situation that have been evicted since 1 January 2008 for default on a mortgage loan or other regulated circumstances. Bankia has contributed 2,921 homes to the Fund.

Sign-up date: 17 January 2013.

- United Nations Global Compact. Bankia promotes and embraces the 10 universal principles in the areas of Human Rights, Labour, Environment and Anti-Corruption.

Sign-up date: 15 November 2013.

- SpainSIF. Platform created in Spain to promote socially responsible investment (SRI). The platform includes financial institutions, fund managers, SRI service providers and not-for-profit organisations.

Sign-up date: 1 January 2011.

- Forética (Forum for the Assessment of Ethical Management). A multi-stakeholder organisation that works together with companies to promote ethical and socially responsible management policies based on the engagement and participation of all stakeholders through decision forums.

Sign-up date: November 2012.

- Diversity Charter. Initiative falling under the framework of European Union non-discrimination directives implying a voluntary commitment to support diversity and non-discrimination in the workplace.

Sign-up date: 23 April 2014.

- Fundación SERES (Responsible Society and Businesses). Spanish non-governmental organisation comprising more than 100 companies set up to foster a commitment among companies to improve society through responsible actions aligned to the strategy of each company that create value for everyone.

Sign-up date: 29 July 2014.

- Fundación LEALTAD. A not-for-profit organisation that offers individuals and companies independent, objective and consistent information on NGOs to help them decide which one to collaborate with, and guide them in monitoring their donations. This information is based on free transparency analyses by the foundation of NGOs that voluntarily so request.

Sign-up date: 2 July 2014.

- Fundación ETNOR (foundation for ethics in business and organisations). Non-profit organisation founded in 1991 to promote acknowledgement and dissemination of and respect for the ethical values inherent in economic activity and quality at public and private organisations and institutions.

Sign-up date: 5 November 2015.

- Plan de Educación Financiera (financial literacy plan) of the CNMV and the Bank of Spain. Plan to enhance financial awareness in society, providing tools and knowledge to aid in financial decision-making.

Sign-up date: 1 January 2011.

- Association for the Self-regulation of Commercial Communications (Autocontrol). Platform comprising self-regulation systems, as the industry's response to society's demands for a degree of assurance of reliability and credibility in advertising. The platform is not intended to replace legal oversight, but rather to supplement it through joint regulation.

Sign-up date: 1 January 2011.

- The Spanish Association of Advertisers. The Spanish Association of Advertisers is the non-profit professional association that represents advertising companies in the defence of their interests in all matters affecting commercial communication. It represents advertising companies (more than 200 associates) with a view to fostering ethical, responsible and efficient communication and dialogue with society. The association defends the freedoms of communication and competition and seeks the recognition of the value of their brands' communication.

Sign-up date: 1 January 2011.

- Spanish Association of Social Responsibility Directors (DIRSE). The purpose of this association is to ascertain and clearly define and demarcate the professional status of CSR managers with a view to appropriate recognition of their management function and professional role. It also aims to identify and apply in Spain the trends of similar associations in other countries that have laid the groundwork.

Sign-up date: 16 December 2015.

- The Spanish Green Growth Group is an association that promotes public-private collaboration with a view to joint progress regarding environmental challenges, through solutions regarding climate change mitigation and adaptation, the decarbonisation of the economy and the promotion of a circular economy. This association encourages companies to participate in national and international discussion forums and shares information to identify opportunities for Spanish companies.

Sign-up date: 2 November 2017.

- The Business and Society Foundation is an organization that drives social change through business innovation and promotes innovative ideas through studies, collaborative forums and services. It works through a permanent observatory on business, the economy and society, and provides associative services to identify business solutions and content, form part of innovation committees and collaborate with corporate work groups.

Sign-up date: 6 September 2017.

- Dow Jones Sustainability Index (DJSI). Bankia was included on this index in 2016, which recognises it as one of the most sustainable companies in the world. Only 25 banks in the world (of which 9 are European, including three Spanish banks) are listed on the index. The DJSI evaluates companies' economic, environmental and social performance. Bankia was removed from the index in 2018. Nonetheless, following an analysis by RobecoSam, it was relisted on the Dow Jones Sustainability Index Europe in September 2019

Date of listing: 30 December 2016.

- CDP is an independent, not-for-profit organisation with the world's largest database of corporate information on climate change and representing more than 820 institutional investors. It provides the only global system for companies to report on their environmental impacts and the measures adopted to reduce them.

Sign-up date: 1 January 2012.

- Fundación Ecología y Desarrollo (ECODES) seeks to promote a sustainable economic and social development model by generating, implementing and disseminating activity models that factor in environmental and social costs in institutional, business and personal decision-making processes. Moreover, through ECODES, Bankia has become a strategic ally in the #PorElClima community, whose objective is to assist with and facilitate pro-climate actions and raise awareness about the efforts of social partners to stop climate change.

Sign-up date: 4 April 2018.

•Corporate Excellence - Centre for Reputation Leadership. Under the brand name "Corporate Excellence - Centre for Reputation Leadership", Fundación Excelencia Corporativa en Comunicación y Reputación (Fundación ECCR) aims to develop and encourage initiatives and actions that can contribute to enhancing corporate and business reputation. Its main objectives are: to boost organisations' competitiveness and legitimacy through excellent management of their reputation, brand, communications, public affairs, sustainability, metrics and training; to demonstrate the economic impact of intangible assets and resources; to promote long-term strategies with a multi-stakeholder vision; and to promote cooperation between different social actors as a means of regaining trust and generating economic, social and environmental value.

Sign-up date: 11 July 2018.

• TCFD. Bankia has undertaken to abide by the recommendations on financing and climate change of the Task Force on Climate-related Financial Disclosure (TCFD) promoted by the UN Financial Stability Board. Bankia will follow the recommendations of the UN Financial Stability Board (FSB) in assessing its climate-related risks and opportunities to promote a transition to a low-carbon economy. The recommendations of the Task Force on Climate-related Financial Disclosure focus on four areas: governance, strategy, risk management, and metrics and targets. Addressing these recommendations will help Bankia to measure and manage its climate-related risks.

Sign-up date: 5 June 2018.

• UNEPFI. UN Environment Programme Finance Initiative (UNEP FI) is a partnership between UNEP and the global financial sector to mobilize private sector finance for sustainable development. Bankia has signed up for two initiatives promoted by UNEPFI:

- Principles for Responsible Banking. This commitment implies that signatories of the principles recognise that they play an active role in creating a sustainable economy and are committed to integrating environmental and social considerations in their operations to achieve a sustainable banking industry.
- Collective Commitment to Climate Action. The entity is committed to developing products and services that facilitate the economic transition required to achieve climate neutrality. The signatories undertake to align their operations with the Paris Agreement and the United Nations Sustainable Development Goals (SDGs).

Sign-up date: 22 September 2019.

• Signature of the Women's Empowerment Principles. Launched by the UN Global Compact and UN Women in 2010. They offer a global framework for companies on how to empower women in the workplace, the market and the community. Bankia complies with the seven principles in the form of the policies and initiatives carried out under its equality and diversity plans and reported in the Non-Financial Information Statement.

Sign-up date: 22 May 2020

This Annual Corporate Governance Report was approved by the Board of Directors of the company in its meeting held on:

16/02/2021

Indicate whether any director voted against or abstained from approving this report.

[] Yes
[] No

Certificate to attest that at the meeting held on 16 February 2021 the Board of Directors of BANKIA, S.A. authorised the issue of the consolidated annual accounts and consolidated directors' report for the period from 1 January 2020 to 31 December 2020, which comprise: the consolidated balance sheet, consolidated statement of recognised income and expense, consolidated statement of changes in equity, consolidated statement of cash flows and notes thereto, together with the annual corporate governance report and the consolidated non-financial information statement of the Bankia Group, which are appended thereto. These documents are endorsed with the signature below of the members of the Board of Directors of BANKIA, S.A. The directors hereby declare that, to the best of their knowledge, the aforementioned accounts have been prepared in accordance with the applicable accounting principles and that they give a true and fair view of the equity, financial position and financial performance of the Company and the consolidated companies taken as a whole. In addition, the directors' report includes a true and fair analysis of the business performance, results and position of the Company and the consolidated companies taken as a whole, together with a description of the main risks and uncertainties they face.

In Madrid, on 16 February 2021.

Mr. José Ignacio Goirigolzarri Tellaeché
Chairman

Mr. José Sevilla Álvarez
Chief Executive Officer

Mr. Joaquín Ayuso García
Board Member

Mr. Francisco Javier Campo García
Board Member

Ms. Eva Castillo Sanz
Board Member

Mr. Jorge Cosmen Menéndez-Castañedo
Board Member

Mr. Carlos Egea Krauel
Board Member

Mr. José Luis Feito Higuera
Board Member

Mr. Fernando Fernández Méndez de Andés
Board Member

Ms. Laura González Molero
Board Member

Mr. Antonio Greño Hidalgo
Board Member

Mr. Antonio Ortega Parra
Board Member

Ms. Nuria Oliver Ramírez
Board Member



KPMG Asesores, S.L.
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28046 Madrid

Independent Assurance Report on the Non-Financial Information Statement of Bankia, S.A. and subsidiaries for 2020

To the Shareholders of Bankia, S.A.

Pursuant to article 49 of the Spanish Code of Commerce, we have provided limited assurance on the accompanying consolidated Non-Financial Information Statement (hereinafter NFIS) for the year ended 31 December 2020 of Bankia, S.A. (hereinafter Bankia or the Parent) and its subsidiaries (hereinafter the Group), which was prepared in accordance with the comprehensive option of the Global Reporting Initiative Sustainability Reporting Standards (GRI Standards) and forms part of the Group's Directors' Report.

The NFIS includes additional information beyond that required under the GRI standards following the comprehensive option and under prevailing mercantile legislation concerning non-financial information, which has not been subject to our assurance work. Our work was limited exclusively to providing assurance on the information identified in the following tables in the accompanying NFIS: "Appendix II. GRI content index" and "Appendix I. Table of contents. Law 11/2018 of 28 December".

Bankia management has also requested we provide limited assurance on the "Emissions (tCO₂)" section of the accompanying NFIS, prepared in accordance with GRI 305-1, 305-2 and 305-3.

Responsibility of the Parent's Directors and Management

Bankia's Directors are responsible for the preparation of the NFIS included in the Group's consolidated Directors' Report. The NFIS has been prepared in accordance with prevailing mercantile legislation and the comprehensive option of the GRI standards, based on the content indicated for each topic in "Appendix I. Table of contents. Law 11/2018 of 28 December", "Appendix II. GRI content index" and the NFIS itself.

Parent management is responsible for the preparation and presentation of the information reflected in the "Emissions (tCO₂)" section of the accompanying NFIS, in accordance with GRI 305-1, 305-2 and 305-3.

This responsibility also encompasses the design, implementation and maintenance of the internal control deemed necessary to ensure that the NFIS is free from material misstatement, whether due to fraud or error.

The Parent's Directors are also responsible for defining, implementing, adapting and maintaining the management systems used to obtain the information required to prepare the report.

Our Independence and Quality Control

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

Our firm applies International Standard on Quality Control 1 (ISQC1) and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

The engagement team comprised professionals specialised in reviews of non-financial information and, specifically, in 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.

We conducted our review engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 Revised "Assurance Engagements Other than Audits or Reviews of Historical Financial Information" and ISAE 3410 "Assurance Engagements on Greenhouse Gas Statements", both issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC); and with the guidelines for assurance engagements on the Non-Financial Information Statement issued by the Spanish Institute of Registered Auditors (ICJCE).

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, and consequently, the level of assurance provided is also lower.

Our work consisted of making inquiries of management and of the different units and areas in charge of the Group that participated in the preparation of the NFIS, reviewing the processes for compiling and validating the information presented in the report, and applying certain analytical procedures and sample review tests, which are described below:

- Meetings with Group personnel to gain an understanding of the business model, policies and management approaches applied, and the principal risks related to these matters, and to obtain the information necessary for the external review.
- Analysis of the scope, relevance and completeness of the content of the NFIS based on the materiality analysis performed by the Group and described in the "Materiality" section, considering the content required by current mercantile legislation.
- Analysis of the processes for compiling and validating the information presented in the report for 2020.
- Review of the information related to the risks, policies and management approaches applied in relation to the material aspects presented in the NFIS for 2020.



- Corroboration, through sample testing, of the information related to the content of the NFIS for 2020 and whether it has been adequately compiled based on data provided by the information sources.
- Procurement of a representation letter from the Directors and management.

Conclusion

Based on the assurance procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that:

- a) The NFIS of Bankia, S.A. and its subsidiaries for the year ended 31 December 2020 has not been prepared, in all material respects, in accordance with prevailing mercantile legislation and the comprehensive option of the GRI standards, based on the content indicated for each topic in "Appendix I. Table of contents. Law 11/2018 of 28 December" and Appendix II. GRI content index" of the NFIS.
- b) The information included in the "Emissions (tCO₂)" section of the NFIS of Bankia, S.A. and its subsidiaries for the year ended 31 December 2020 has not been prepared, in all material respects, in accordance with GRI 305-1, 305-2 and 305-3.

Other Matters

On 24 February 2020 a different assurance provider issued a favourable independent assurance report on the Consolidated Non-Financial Information Statement of Bankia, S.A. and its subsidiaries for 2019.

Use and Distribution

This report has been prepared in response to the requirement established in current mercantile legislation in Spain, and thus may not be suitable for other purposes and jurisdictions.

In accordance with the terms of our engagement letter, the information included in the "Emissions (tCO₂)" section of the NFIS was prepared by Bankia, S.A. and may not be used for any other purpose or in any other context.

KPMG Asesores, S.L.

(Signed on original in Spanish)

Ramón Pueyo Viñuales

17 February de 2021



BANKIA, S.A.

Auditor's Report on the "Internal Control over
Financial Reporting (ICOFR) Information" of
BANKIA, S.A. for 2020



KPMG Auditores, S.L.
Paseo de la Castellana, 259 C
28046 Madrid

Auditor's Report on the "Internal Control over Financial Reporting (ICOFR) Information" of BANKIA, S.A. for 2020

To the Directors of BANKIA, S.A.

As requested by the Board of Directors of BANKIA, S.A. (the "Company") and in accordance with our proposal letter dated 28 January 2021, we have applied certain procedures to the "ICOFR information" attached hereto in section F of the Annual Corporate Governance Report (ACGR) of BANKIA, S.A. for 2020, which summarises the Company's internal control procedures for annual financial reporting.

The Board of Directors are responsible for adopting appropriate measures to reasonably ensure the implementation, maintenance and monitoring of an adequate system of internal control and developing improvements to that system, as well as defining the content of and preparing the ICOFR information attached hereto.

In this respect, it should be borne in mind that irrespective of the quality of the design and operation of the internal control system adopted by the entity in relation to annual financial reporting, the system may only provide reasonable, but not absolute assurance in relation to the objectives pursued, due to the limitations inherent in any internal control system.

In the course of our audit work on the annual accounts and in accordance with Technical Auditing Standards, our evaluation of the entity's internal control was solely aimed at enabling us to establish the scope, nature and timing of the audit procedures on the entity's annual accounts. Consequently, the scope of our evaluation of internal control, performed for the purposes of the audit of accounts, was not sufficient to enable us to issue a specific opinion on the efficacy of this internal control over regulated annual financial reporting.

For the purposes of issuing this report, we have applied only the specific procedures described below and set out in the *Guidelines for preparing the auditor's report on the information on the system of internal control over financial reporting of listed companies*, published on the website of the Spanish National Securities Market Commission (CNMV), which define the work to be performed, the minimum scope thereof and the content of this report. As the scope of the work resulting from these procedures is in any event limited and substantially less than that of an audit or review of the internal control system, we do not express an opinion on its effectiveness or design or operating efficiency, with respect to the entity's annual financial reporting for 2020 described in the ICOFR information attached hereto. Consequently, had additional procedures been applied other than those established in the aforementioned Guidelines, or had an audit or a review been performed of the internal control system in relation to regulated annual financial reporting, other events or matters could have been identified, which would have been reported to you.

As this special work did not constitute an audit of accounts and is not subject to current legislation regulating the audit of accounts in Spain, we do not express an audit opinion under the terms provided in such legislation.



The procedures applied were as follows:

1. Reading and understanding of the information prepared by the entity regarding ICOFR – disclosures included in the Directors' Report – and an evaluation of whether this information meets all the minimum reporting requirements, taking into account the minimum content described in section F, on the description of ICOFR, of the ACGR template provided in the Spanish National Securities Market Commission (CNMV) Circular 5/2013 of 12 June 2013 and subsequently amendments, the most recent being CNMV Circular 1/2020 of 6 October 2020 (hereinafter the CNMV Circulars).
2. Inquiries of the personnel responsible for drawing up the information detailed in point 1 above in order to: (i) gain an understanding of the preparation process; (ii) obtain information that allows us to assess whether the terminology used conforms to the definitions contained in the reference framework; (iii) obtain information on whether the control procedures described are in place and operational in the entity.
3. Review of the explanatory documents supporting the information detailed in point 1 above, primarily including documents directly made available to those responsible for describing ICOFR systems. This documentation includes reports prepared by internal audit, senior management and other internal or external specialists supporting the Audit Committee.
4. Comparison of the information detailed in point 1 above with the understanding of the entity's ICOFR gained as a result of the procedures performed within the framework of the audit work on the annual accounts.
5. Reading of the minutes of the meetings of the Board of Directors, Audit and Control Committee and other committees of the entity for the purposes of assessing the consistency of the matters discussed at these meetings in relation to ICOFR with the information detailed in point 1 above.
6. Procurement of a representation letter concerning the work performed, duly signed by those responsible for preparing and drawing up the information detailed in point 1 above.

As a result of the procedures applied to the ICOFR information, no inconsistencies or incidents have been detected that could affect it.



This report has been prepared exclusively within the context of the requirements laid down in article 540 of the Revised Spanish Companies Act and in the CNMV Circulars for the purposes of the description of ICOFR in annual corporate governance reports.

KPMG Auditores, S.L.

On the Spanish Official Register of Auditors ("R.O.A.C.") with nº S0702

(Signed on original in Spanish)

Pedro González Millán

On the Spanish Official Register of Auditors ("R.O.A.C.") with nº 20.175

17 February de 2021