



## General Corporate Policy on Conflicts of Interest – CaixaBank Group

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## 1. Introduction

### 1.1 Background

These General Principles of the CaixaBank Group's Corporate Conflicts of Interest Policy provide a general framework for managing and resolving conflicts of interest within the Group. The very fact these Principles exist makes it a further mitigating mechanism for conflicts of interest because it provides a general framework for them to be addressed.<sup>1</sup> This general framework contains other internal regulations and other mandatory regulatory documents regarding different services and activities for specific fields, where specific sections on conflicts of interest are also included.

The companies comprising the CaixaBank Group shall implement a number of policies and procedures to identify, prevent, manage and log conflicts in accordance with the highest possible professional standards and principles, adopting provisions equivalent to the stipulations of these General Principles, in accordance at all times with the nature and specific features of their activity and applicable law. Moreover, policies addressing any activities likely to generate conflicts of interest must fall broadly in line with the provisions of these General Principles.

The CaixaBank Group (hereinafter CaixaBank Group or "the Group") Governance and Management Bodies must take pertinent decisions in order to take on board the stipulations of these Principles and apply the guidelines set out therein, in accordance with the specific features of each of the companies and with any legal and/or regulatory provisions that may apply in each case.

These Principles do not modify the working relations between Group companies and their employees, and should not be interpreted as an employment contract or a promise of employment for any period of time.

### 1.2 Scope

The risk to be managed and controlled under these General Principles is the risk of conflicts of interest.

Conflicts of interest are common and inherent to professional and corporate relations. This reality compels companies to take organizational and administrative measures to prevent and address any risk of these conflicts leading to improper action.

The principles and procedures set out in the General Principles of the CaixaBank Group's Corporate Conflicts of Interest Policy are inspired by the Group's commitment to act with due diligence in complying with prevailing law and regulations and upholding the principles of respect, integrity, transparency, excellence and professionalism, confidentiality, and social responsibility, as enshrined in its Code of Ethics.

In the normal course of its business, however, the Group faces both potential and real conflicts of interest due to its nature and areas of activity.

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<sup>1</sup> At the date of approval of these General Principles, the following documents form part of these internal regulations, although this list is for information purposes only and is not exhaustive:

- Code of ethics
- CaixaBank Group's Internal Rules of Conduct on matters relating to the Securities Market
- Policy concerning Conflicts of Interest in relation to Directors and the General Meeting.
- Policy concerning Conflicts of Interest as per MiFID requirements.
- Regulations concerning conflicts of interest in the specific context of companies making up the CaixaBank Group.
- CaixaBank Group General Remuneration Policy.

### 1.3 Objective

These General Principles set out to furnish a global benchmark framework for Group companies, stating, in a standard harmonised way, the general principles and procedures of action to be taken to address any real or potential conflicts of interest arising in the course of their respective activities and services.<sup>2</sup>

In this regard, the General Principles shall serve as a guide for CaixaBank Group companies mainly in relation to the following:

- Identification of areas and situations the nature of which makes them more vulnerable to potential conflicts of interest that could be detrimental to the general interests of the Group and of the Covered Parties.<sup>3</sup>to shareholders and/or customers.
- Definition and adoption of measures to prevent, identify, manage, and disclose conflicts of interest.
- Procedure for disclosure of conflicts related to investment or ancillary services when appropriate, for cases in which the aforementioned measures prove ineffectual to eliminate or, failing this, to satisfactorily mitigate any residual risk which could be disclosed to the detriment of the Covered Parties, shareholders and/or customers.<sup>4</sup>.

The content of these General Principles includes:

- Strategy or general principles governing how conflicts of interest are managed
- Conflict of interest risk management framework

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<sup>2</sup> This broad framework is enhanced by policies, procedures and regulations in force, notwithstanding their possible adaptation to the provisions of these General Principles.

<sup>3</sup> This refers to those persons subject to these General Principles.

<sup>4</sup> The general procedure for action to be taken, which addresses the phases stipulated herein, is set out in section 5. "Framework for managing conflicts of interest"

## 2. Scope of application

### 2.1 Corporate Sphere

These General Principles are corporate in nature. Therefore, the general principles defined apply to all CaixaBank Group companies that carry out any activity exposed to conflict of interest risk. The governance bodies of these companies will make the decisions necessary to integrate the provisions of these Principles. They will apply the principle of proportionality to adapt the governance framework to the idiosyncrasy of their structure of governance bodies, committees, and departments, as well as their principles of action, methodologies, and processes to the content of this document.

This integration may entail, among other decisions, the approval of internal principles by the subsidiary. This approval will be necessary in those Group companies that need to adapt the content of these Principles to their own specific situation, whether in terms of the subject matter, the jurisdiction or the significance of the risk in the subsidiary. In those cases in which the risk control and management activities of the subsidiary are carried out directly by CaixaBank, whether due to the materiality of the risk in the subsidiary, for reasons of efficiency, or because the subsidiary has outsourced the operational management of this risk to CaixaBank, the governing bodies of the affected Group companies shall be informed at least of the existence of these General Principles and their application to such Group companies. The governance bodies of subsidiaries will abide by these General Principles when the operational principles are applicable and the subsidiary does not have its own principles, and the content of the corporate policy lays out principles, obligations and activities that apply directly to the subsidiary.

In any case, the Regulatory Compliance function at CaixaBank, given its corporate character, shall ensure that these General Principles are proportionally integrated into the subsidiaries, that if subsidiaries approve their internal policies, they are consistent with the corporate policy, and that there is consistency throughout the CaixaBank Group.

Finally, in addition to being corporate, these General Principles are considered to be individual General Principles of CaixaBank, parent company of the CaixaBank Group.

### 2.2 Subjective Scope: the Covered Persons

These General Principles shall apply to those involved in, or who may be involved in, the activities of CaixaBank Group companies, namely the Group's employees and members of the Board of Directors,<sup>5</sup> all of whom are known as Covered Persons.

These Covered Persons must avoid all conflicts of interest and, when they cannot be avoided, the necessary internal mechanisms shall be in place to resolve them without granting privileges to any of said parties.

Associated persons<sup>6</sup> shall comply with the principles underpinning these General Principles, even if their literal nature does not apply to them.

### 2.3 Infringements and Sanctions

Any conduct, either through action taken or failure to take action, that is contrary to the obligations set out in these General Principles and in all internal regulations at each company forming part of the Group in relation to conflicts of interest could potentially constitute a disciplinary breach. In this regard, bodies at CaixaBank Group companies exercising disciplinary powers shall take action accordingly in each case.

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<sup>5</sup> This is without prejudice to the Regulations of the Board of Directors of CaixaBank, and Royal Legislative Decree 1/2010 of 2 July, enacting the restated text of the Corporate Enterprises Act in respect of persons related to the members of the Board of Directors.

<sup>6</sup> Persons who, while not considered employees, provide services for any CaixaBank Group company, either directly or on behalf of other parties

Moreover, failure to comply with the provisions of these General Principles by any Covered Persons discharging functions in connection with the securities markets is considered a serious or extremely serious infringement, in accordance with securities market regulations.

### 3. Regulatory Framework. Applicable Standards and Regulations

These Principles shall be governed by the pertinent legislation in force at all times and any legislation amending or replacing it in the future. Specifically, at the date it is being drawn up, the prevailing regulations applicable to the Group's parent company are:

- Regulation (EU) No 575/2013 of the European Parliament and of the Council, of 26 June 2013, on prudential requirements for credit institutions and investment firms.
- EU Directive 2013/36 of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and investment firms.
- Spanish Law 10/2014, of 26 June, on the organisation, supervision and capital adequacy of credit institutions.
- Royal Decree 84/2015, of 13 February, implementing Act 10/2014 of 26 June.
- Bank of Spain Circular 2/2016, of 2 February, on the supervision and solvency of credit institutions.
- CNMV Circular 1/2014, of 26 February, on internal organisation requirements and control functions for investment firms.
- Bank of Spain Circular 4/2017, of 27 November, on public and reserved financial information standards and formats for credit institutions.

Where subsidiaries are subject to foreign jurisdictions or supplementary sector regulations, the policies and procedures that these subsidiaries roll out shall, in addition to their own standards, take into account the consolidated obligations contained in the aforementioned regulations wherever they do not contradict the specific requirements of the corresponding jurisdiction or sector regulations.

Lastly, each Group company shall develop the necessary rules, guidelines or procedures to ensure the effective implementation, execution, and observance of these Principles.

A list of regulations concerning conflicts of interest issued by the various regulatory bodies is provided below. This is not exhaustive and is for information purposes only, indicating the regulatory context of the General Principles:

#### European Union

- Directive 2013/36/EU of the European Parliament and the Council, dated 26 June 2013, on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms.
- Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments.
- Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities (UCITS).
- Commission Directive 2006/73/EC of 10 August 2006 implementing Directive 2004/39/EC of the European Parliament and of the Council as regards organizational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive.
- 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.
- Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (recast).
- Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 amending Directive 2007/36/EC with regard to promoting long-term shareholder engagement.
- EBA-GL-2021-05 Guidelines on Internal Governance.

- Directive (EU) 2016/97 of the European Parliament and Council, of 20 January 2016, on the distribution of insurance.
- EBA-GL-2020-06 Guidelines on granting and monitoring loans.
- International Chamber of Commerce - ICC Conflicts of interest guidelines July 2018.

#### Spain

- Law 5/2021 of 12 April was published, amending the revised text of the Spanish Capital Companies Act, approved by Royal Legislative Decree 1/2010 of 2 July, and other financial regulations concerning the promotion of long-term shareholder engagement in listed companies.
- Royal Decree 217/2008, February 15, on the legislation governing investment companies and other entities providing investment services.
- Law 6/2023, of 17 March, on securities markets and investment services.

The regulatory framework shall be updated as part of the review of these General Principles, in order to include all additional regulations and modifications concerning conflicts of interest coming into force.



## 4. General principles of conflict of interest risk management

### 4.1 Definition of a Conflict of Interest

On the basis of the general concept furnished by the European Banking Authority (EBA), a conflict of interest is defined as a situation of discrepancy or collision between the duty of an individual or a legal entity and their private interests / the interests of another individual or legal entity, exercising unwarranted influence on the performance of their duties and responsibilities.

For the purposes of establishing common criteria to identify any conflicts of interest that may arise at companies within the CaixaBank Group, it shall be necessary to determine whether any of the following situations are applicable to the companies:

- Obtaining economic, political or personal gain or any other type of gain at the expense of another Covered Party and/or customer.
- Existence of interests other than those of a Covered Party and/or a customer in the outcome of the service or activity concerned.
- Existence of financial incentives or incentives of other types to favour the interests of a Covered Person and/or a customer as opposed to third Covered Parties and/or customers.
- Carrying on a professional activity which is identical to that of the Covered Parties and/or customer.
- Receiving incentives from a third party in relation to the service or activity, in the form of money, goods or services, political or professional benefits, other than the commission or habitual remuneration for the service or activity concerned.

### 4.2 General Principles

The General Principles described in this document are intended to be the following:

- **General**, acting as a framework for all Group companies, with the capacity to take on board the internal regulations of Group companies.
- **Flexible**, to enable them to be properly applied to the size and organisation of each Group company, and to the nature, scale and complexity of their activity.
- **Permanent**, thereby acting as a stable benchmark to enable conflicts of interest to be addressed at Group companies.
- **Dynamic**, so that they can be reviewed on a regular basis to ensure that they remain up to date and fit for purpose.
- **Enforceable**, so that they may be applied and serve to address specific situations in practice.

### 4.2 General principles applicable to Covered Persons

Notwithstanding the specific duties and obligations stipulated throughout these General Principles, Covered Persons must provide services and carry out their functions in accordance with the guiding, inspirational principles set out in the Code of Ethics. Consequently, in due compliance with their duty of loyalty, they must place the interests of customers, the Group and its shareholders ahead of their own personal interests when discharging their duties.

They must also undertake the following as general principles of action to be taken:

- **Independence**. Covered Persons must act at all times with freedom of judgment, showing good faith and loyalty to the Group, its shareholders and customers, and independently of their own interests or the interests of any parties that may be related to them.

- **Abstention.** Covered Persons must abstain from participating in or influencing decision-making that may affect them, shareholders and/or customers with which a conflict exists, and from gaining access to relevant information or insider information which may affect said conflict.
- **Communication.** Covered Persons shall report any conflicts of interest in which they may be involved due to their activities outside the Group, their family relationships, their personal assets, or for any other reason. This communication shall be compulsory in those cases explicitly described in the internal regulations implementing these General Principles. Potential conflicts of interest shall be reported through the communication channels established by Group companies, and must be reported as soon as possible, if doing so is mandatory, and in any case prior to any decision that may be affected by the potential conflict of interest.
- **Transparency.** Covered Persons must provide precise, truthful and comprehensible information concerning any conflict of interest to have arisen, thus enabling Regulatory Compliance to reach an informed decision as to whether or not the activity or service in question should continue.

## 5. Framework for managing conflicts of interest

The procedures for action to be taken in connection with conflicts of interest described in this section shall apply to entities making up the CaixaBank Group. Any Group companies implementing additional procedures within the scope of their own activities must do so in accordance with these General Principles.

### 5.1 Identification of Conflicts of Interest

Conflicts of interest may be classified in the following categories, depending on the parties involved:

i Conflicts of interest between CaixaBank Group companies and their customers

CaixaBank Group companies may have a conflict of interest with their customers in the event of one of the situations described below:

- Receiving incentives in the form of money, goods or services, political or professional rewards, or rewards other than the fees or customary remuneration received for providing services to the customer.
- Making use of the capacity of CaixaBank Group companies to influence or condition the decision taken by the customer, to the detriment of the latter.
- Using confidential information which gives CaixaBank Group companies an advantage with respect to the customer concerning a service or activity.
- Giving priority to the interests of CaixaBank Group companies by contracting a product or providing a service that does not suit the needs of the customer and is not provided in the best possible conditions for the customer.
- Carrying out the same activity as the customer, if this leads to an incompatibility which generates discrepancies between the interests of both parties.

In order to prevent any conflicts of interest with their customers, the employees, and members of the Board of Directors, with regard to themselves and to their Related Parties,<sup>7</sup> must not accept gifts, favours or gratifications or other benefits from a customer, especially when an operation is being carried out, except in circumstances permitted by social customs specified in CaixaBank's internal regulations.

ii Conflicts of interest between customers

A conflict of interest is identified when the CaixaBank Group company gives preferential treatment to one of its customers with respect to other customers of CaixaBank Group companies, as the result of economic links or other kinds of links, to the detriment or disadvantage of another customer.

iii Conflicts of interest between CaixaBank Group companies and the members of their respective Boards of Directors

Within the context of their duty to avoid conflicts of interest, Directors of CaixaBank Group companies and related parties must refrain from:

- Using the name of the CaixaBank Group company or making use of their status as director to unduly influence private operations.
- Making use of the CaixaBank Group company's assets and availing themselves of their position at the Company to obtain a financial advantage, or for any private reasons.
- Availing themselves of any Company business opportunities that may have arisen in connection with the exercise of functions by the director.

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<sup>7</sup> Related Parties are understood as those considered as such in the internal policies and regulations which govern the various areas

- Obtaining advantages or remuneration from third parties other than the Company and its Group in association with the exercise of their functions.
- Carrying out activities on their own account or as an employee when doing so effectively competes, whether actually or potentially, with CaixaBank Group companies.
- With the exceptions set out in the consolidated text of the law on corporations and in the operational regulations of the Board of Directors, carrying out either directly or indirectly professionals or commercial transactions with the CaixaBank Group company.

iv Conflicts of interest between CaixaBank Group companies<sup>8</sup> and their shareholders (including shareholder proxies)

In connection with the CaixaBank General Shareholders' Meeting, shareholders and their proxies may have a conflict of interest when an attempt is made to adopt a resolution the purpose of which is to:

- Release the shareholder concerned from an obligation or grant rights to the shareholder concerned.
- Furnish any kind of financial assistance to the shareholder, including the provision of collateral in favour of the shareholder.
- Release the shareholder from obligations arising from the duty of loyalty legally established for directors.

v Conflicts of interest between employees, Associated Parties or their Related Parties and CaixaBank Group companies

Employees, Associated Parties or their Related Parties may have conflicts of interest in the event of one of the following situations:

- Putting their interests before those of CaixaBank Group companies, interfering with their professional activity.
- Taking part in activities or transactions of any kind in which the employees themselves or related parties are the beneficiaries or direct or indirect participants.
- Making unwarranted use of any information to which they have access due to their position, funds of CaixaBank Group companies, intellectual property or assets for personal reasons or reasons unrelated to the business purpose of the CaixaBank Group company. The situation shall be particularly serious in cases involving insider information or confidential information.
- Using the name of the Group or of a CaixaBank Group company for the purpose of unduly influencing the provision of an activity or service which leads to economic, personal or political rewards or other types of rewards, and is detrimental to the interests, values or reputation of a CaixaBank Group company.
- Making use of their position or status as employees, Associated Parties or Related Parties to obtain economic advantage.
- Carrying on activities on their own behalf or as an employee when doing so constitutes real or potential competition with the business activities of their employer company.

vi Conflicts of interest between CaixaBank Group companies and their suppliers

CaixaBank Group companies may have conflicts of interest with their suppliers in the event of one of the following scenarios:

- Unduly influencing the selection of suppliers to which employees of CaixaBank Group companies / members of governance bodies or their Related Parties have economic or family ties.
- Receiving gifts, favours or gratifications or other benefits from a supplier, except in circumstances permitted by social customs specified in CaixaBank's internal regulations.

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<sup>8</sup> In cases where this is applicable.

- Disclosing confidential information concerning the economic or technical conditions or other conditions submitted by competing suppliers for the purposes of favouring a third party.
- Issuing a call for tenders for a specific item or service with differing requirements, depending on the supplier to which it is sent.

vii Conflicts of interest between departments of the same CaixaBank Group company or between departments of different CaixaBank Group companies

Different departments of CaixaBank Group companies may have a conflict of interest in the event of one of the following situations:

- Exchanging confidential information or insider information concerning an activity or service that is detrimental to the interests of customers/of the CaixaBank Group company itself.
- Exercising unwarranted influence on other departments in carrying out their activities or services.
- Being simultaneously or consecutively involved in various services or activities, leading to a potential risk of jeopardising the interests of the customer or of the CaixaBank Group company itself.

viii Conflicts of interest between CaixaBank Group companies

CaixaBank Group companies may have conflicts of interest with the Group when they are in one of the following situations, although this list is not exhaustive:

- Implementing corporate development strategies or other structural modifications that are detrimental to the interests of the Group or its companies.
- Approving and offering products or services the characteristics and distribution strategy of which are not suited to or respond to the needs of the target market, with a consequent detrimental impact on the interests and reputation of the entire Group.
- Using a brand which is contrary to the positioning, values and attributes of the Group.
- Issuing communications to the market, investors, analysts or media, inter alia, where the message conveyed is detrimental to the interests of the Group.
- Giving preferential treatment to one customer with respect to other Group customers, as the consequence of economic ties or other ties.
- Using the name of the Group for the purpose of unduly influencing the provision of an activity or service which leads to economic, personal or political benefits or other types of benefits, and is detrimental to the interests, values or reputation of the Group.

ix Other potential conflicts of interest

Other situations shall also be identified that have not been addressed in the aforementioned categories but that are liable to generate conflicts of interest as the result of services and activities provided and relations with the various Covered Parties, shareholders and/or customers.

## 5.2 Prevention Measures

CaixaBank Group companies shall have measures in place to prevent the conflicts of interest identified. There follows a list of the main measures, although this is for information purposes and is not exhaustive:

- The principles enshrined in the Code of Ethics are also there to mitigate conflicts of interest and must govern the activity of all persons subject to these General Principles.
- The Group takes it upon itself to define and implement policies and procedures establishing best practices for the prevention of conflicts of interest by specific areas of application, in addition to common corporate frameworks for action to be taken which shall constitute benchmark criteria, and these may be taken on board by CaixaBank Group companies independently exercising their responsibility for preventing conflicts of interest.

- As a result of the foregoing, there shall be an organisational structure in connection with the prevention and management of conflicts of interest to guarantee proper monitoring of the stipulations of the aforesaid policies and procedures, and ensure that a sturdy solvent control environment is in place. The current model, structured as three lines of defence, ensures that functions are properly segregated.
- Periodic reports to Senior Management and Governance Bodies to verify the existence of appropriate control procedures and the suitability of the measures taken.
- Establishment of specific training plans for the purposes of creating awareness and implementing honest and transparent professional action as a measure to prevent potential situations of conflicts of interest relating, inter alia, to improper use or use for personal reasons of confidential information, information media, intellectual property or goods of CaixaBank Group companies.
- Any information received from customers shall be considered confidential, and must therefore be treated in a rigorous and responsible fashion pursuant to the regulations in force.
- For the purposes of maintaining this confidentiality, CaixaBank Group companies shall have the necessary barriers to prevent unwarranted usage and transmission of information.
- Departments shall have sufficient human, economic and material means to guarantee the autonomy, independence and objectivity of their activities, with supervision of functions involving sensitive activities or services which could entail a risk of conflicts of interest.
- Biannual review and periodic update of these General Principles, with the adoption of additional prevention measures on the strength of the experience obtained in procedures for action to be taken at CaixaBank Group companies.

### 5.3 Management Mechanisms

There follows a description of the managerial measures applicable to the Covered Parties, shareholders, and customers, and the criteria for resolving conflicts of interest:

#### i Covered Parties and shareholders

Any employee who becomes aware of a conflict of interest must act accordingly by following the procedures set out in the internal regulations implementing these General Principles.

Directors of CaixaBank Group companies must report to their respective Boards of Directors any situation of a direct or indirect conflict of interest concerning either them or parties related to them with respect to the interests of CaixaBank Group companies. In this regard, pursuant to the Group's firm commitment to act in a transparent fashion, any situations of a conflict of interest concerning directors of the CaixaBank Group shall be stated in the corporate report.

However, it shall be possible to dispense with the prohibition concerning conflicts of interest set out in section 6.1.iii *Identification of Conflicts of Interest between CaixaBank Group companies and the members of their respective Boards of Directors* only in specific cases with express authorization from the Board of Directors or the General Meeting, depending on the specific case concerned, as per the stipulations of Article 230 of Royal Legislative Decree 1/2010 of 2 July approving the revised Law on Corporations ("Ley de Sociedades de Capital").

Potential conflicts of interest concerning shareholders shall be reported through the communication channels established by CaixaBank Group companies, and the Board of Directors shall be responsible for addressing these conflicts.

## ii Omni-channel

Should customers identify any situations that could lead to potential conflicts of interest, they may report these through the communication channels established by CaixaBank Group companies. The CaixaBank Group company's Regulatory Compliance Unit shall address the situations reported and shall take charge of the investigation, and to this end it shall require participation by other areas or departments of the CaixaBank Group company.

## iii Criteria for resolving conflicts of interest

The following criteria shall be taken into account when resolving any conflicts of interest affecting customers:

- In the event of a conflict between CaixaBank Group companies and a customer, the interests of the latter must be safeguarded.
- In the event of a conflict between customers:
  - An attempt shall be made to ensure that no party receives preferential treatment.
  - The services or activities contracted by customers cannot be disclosed to other customers under any circumstances.
  - A customer cannot be encouraged to contract a service or an activity for the purposes of benefiting another.

Conflicts of interest that do not involve customers shall be resolved according to their nature and characteristics, following the procedures established in the internal rules implementing these General Principles. This shall always be done under the premise of placing the interests of customers, the Group and its shareholders before personal interests in all professional conduct.

### *5.4 Disclosure of Situations of a Conflict of Interest*

If the measures adopted by CaixaBank Group companies are insufficient to ensure, with reasonable certainty, elimination of conflicts of interest relating to investment or ancillary services, the CaixaBank Group company shall apply the procedures for notifying and warning customers established in current regulations concerning the Securities Market.

### *5.5 Recording Conflicts of Interest*

The communication and registration of conflicts of interest shall be carried out in accordance with the procedures established in the internal regulations in force at any given time.

Each CaixaBank Group company shall keep an updated log of any conflicts of interest reported.

The information communicated and logged concerning the phase of disclosure of conflicts of interest in relation to investment or ancillary services shall be governed by the stipulations of internal regulations.

### *5.6 Making the Policy Available to Customers and Covered Persons*

#### *5.6.1 Customers*

Customers of CaixaBank Group companies may consult the General Principles of the Corporate Policy on Conflicts of Interest on the CaixaBank corporate website.

### 5.6.2. Covered Persons

The General Principles and other internal regulations concerning conflicts of interest are available to employees and members of the Board of Directors on the corporate intranet.

### 5.7 Training for Covered Parties

Employees and members of the Board of Directors who are subject to these General Principles shall be given continuous training to ensure proper awareness of conflicts of interest, focusing on the identification, prevention and management of all such conflicts to promote professional, honest and transparent conduct at all times.

Notwithstanding the fact that all Covered Persons must comply with the provisions of these General Principles, CaixaBank Group companies shall strive to ensure that shareholders and their proxies, Associated Parties and Related Parties who are not given any specific training are governed by standards of conduct and values similar to those established in these General Principles and in other internal regulations concerning conflicts of interest.

CaixaBank Group Regulatory Compliance shall carry out regular reviews to ensure that the training plans delivered by CaixaBank Group companies provide the main parties involved with proper up-to-date knowledge that meets current regulatory requirements concerning conflicts of interest and also with guiding principles enshrined in the Group's Code of Ethics, in keeping with the nature and specific features of the activities performed by each Group company.

The Regulatory Compliance Unit at the CaixaBank Group company or the party designated for this purpose is responsible for conducting a review of the following:

- Training plan currently implemented at the CaixaBank Group company.
- List of topics on courses taught to employees and members of the Board of Directors.
- Course trainees, by areas of business and employment categories.
- Criteria for selection of target trainees.
- Percentage of execution.
- Measurement of the level of success and acceptance of courses by means of internal surveys.
- Frequency of courses taught, and their duration.

Specific training plans shall also be implemented for employees carrying out their functions in areas which are more likely to be exposed to potential conflicts of interest, such as investment and ancillary services, and which call for greater awareness.

New employees and new members of the Boards of CaixaBank Group companies shall receive information on the content of these General Principles, which is available and may be accessed over the corporate intranet.

### 5.8 Management of Exceptions and Specific Cases

Any situation which, as the result of local legal stipulations governing conflicts of interest, requires a specific procedure to add the casuistry to the policies of CaixaBank Group companies on conflicts of interest, shall be:

- Reported to the Regulatory Compliance Unit at the CaixaBank Group company or the party designated for this purpose.



- Escalated to Group Regulatory Compliance, which shall take action accordingly, in accordance with the specific characteristics of the situation.