



General Principles of the Corporate Policy on Conflicts of Interest of the CaixaBank Group

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1. Introduction

1.1 Background

These General Principles of the CaixaBank Group's Corporate Policy on Conflicts of Interest provide the general framework for managing conflicts of interest within the Group. The very existence of these Principles in itself implies an element to mitigate conflicts of interest by providing a general framework for dealing with them.¹ This general framework includes other internal rules and other mandatory regulatory documents relating to different services and activities in specific areas, which also include sections dedicated to conflicts of interest.

The entities that make up the CaixaBank Group will develop a set of policies and procedures that can be used to identify, prevent, manage and record said conflicts in accordance with the highest professional standards and principles, adopting provisions equivalent to those stipulated in these General Principles, and always in accordance with the nature and characteristics of their activity and the applicable laws. Similarly, any policy containing an activity that can create conflicts of interest must consider the provisions of these General Principles in order to be consistent with them.

The Governing and Management Bodies of the CaixaBank Group companies (hereinafter, CaixaBank Group or "the Group") must adopt the appropriate decisions to integrate the provisions of these Principles and apply the guidelines established herein, taking into account the specific circumstances of each company and the legal and/or the regulatory framework applicable to them.

These Principles do not modify the working relationships between Group companies and their employees, nor can they be interpreted as a work contract or a promise to provide employment for any length of time.

1.2 Scope

The risk that these General Principles seek to manage and control is the risk of conflicts of interest.

Conflicts of interest are common and inherent to professional and corporate relationships. This reality requires entities to take organisational and administrative measures to prevent and manage the risk of these conflicts arising from inappropriate actions.

The principles and procedures contained in the General Principles of the CaixaBank Group's Corporate Conflict of Interest Policy are inspired by the Group's commitment to act diligently in accordance with the principles of compliance with laws and regulations in force at any given time, as well as with respect, integrity, transparency, excellence, professionalism, confidentiality, and social responsibility, as outlined in its Code of Ethics.

However, in its ordinary operations, the Group faces both potential and actual conflicts of interest associated with the nature and areas of its activity.

1.3 Objective

The purpose of these General Principles is to provide a global framework for all Group companies that presents, in a standard and harmonised way, the general principles and procedures of action to be taken to

¹ On the date of approval of these General Principles, the following documents, and others, are part of the aforementioned internal regulations:

- Code of Ethics
- Internal Code of Conduct of the CaixaBank Group in Matters Related to Securities Markets
- "Conflict of Interest Policy" for Directors and the General Shareholders' Meeting.
- "Conflict of Interest Policy" as per MiFID requirements.
- Regulations on conflicts of interest for the specific areas of the entities that comprise the CaixaBank Group.
- General Remuneration Policy of the CaixaBank Group.

address any real or potential conflicts of interest that arise over the course of their respective activities and services.².

In this regard, the General Principles will serve as a guide for the companies of the CaixaBank Group, mainly in terms of:

- Identifying areas and situations that, due to their nature, are more likely to pose potential conflicts of interest that can harm the Group's general interests, of Covered Persons³, of shareholders and/or of customers.
- Definition and adoption of measures to prevent, identify and manage conflicts of interest, as well as to report them.
- Procedure for disclosing conflicts related to investment or ancillary services, when applicable, in those cases where the aforementioned measures are ineffective to eliminate or, failing that, mitigate any residual risk that may be revealed and that could be detrimental to the interests of Covered Persons, shareholders and/or customers⁴.

The content of these General Principles includes:

- General strategies or principles that govern how the risk of conflicts of interest is managed
- Framework for managing the risk of conflicts of interest

² This global framework is complemented by the policies, procedures and rules in force, regardless of their possible adaptation to the provisions of these General Principles.

³ It refers to individuals who fall under the subjective scope of these General Principles.

⁴ The general procedure, which covers the phases listed here, is detailed in section 5. "Framework for managing conflicts of interest"

2. Scope

2.1 Company Scope

These General Principles are corporate in nature. Consequently, the general principles are applicable to all CaixaBank Group companies that engage in any activity exposed to risk from conflicts of interest. The governing bodies of these companies will take the appropriate decisions in order to integrate the provisions of these Principles, adapting, in keeping with the principle of proportionality, the governance framework to the characteristics of their governance bodies, committees and departments, and their principles of action, methodologies and processes to the contents described herein.

This integration may prompt, among other decisions, the subsidiary to approve its own principles. Approval will be required in those Group companies that need to adapt the provisions of these Principles to their own circumstances, whether in terms of matter, jurisdiction or the relevance of the risk in the subsidiary. In those cases where the subsidiary's risk control and management activities 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 Group companies concerned will, at a minimum, be made aware of the existence of these General Principles and their application to said Group companies. The governing bodies of the subsidiaries will adhere to these General Principles when the principles of action are applicable, the subsidiary does not draw up its own principles, and the content of these principles lays out obligations and activities that must be carried out directly by the subsidiary.

In any case, the Compliance function at CaixaBank, given its corporate nature, will ensure that the integration of these General Principles into subsidiaries is proportionate, that if subsidiaries adopt their own policies, they are aligned with the corporate policy, and that there is consistency throughout the CaixaBank Group.

Lastly, these General Principles, in addition to being corporate, are also regarded as the individual General Principles of CaixaBank, the CaixaBank Group's parent company.

2.2 Subjective Scope Covered Persons

These General Principles shall apply to those persons who do or may participate in the activities of the CaixaBank Group companies, i.e., the employees and members of the Board of Directors⁵, considered Covered Persons.

Such Covered Persons must avoid all conflicts of interest. When they cannot, internal mechanisms will be made available to resolve them without granting privileges that favour any of the above.

Associated persons⁶ must comply with the guiding principles of these General Principles, even though the literal wording of these principles does not apply to them.

2.3 Infractions and Sanctions

Any conduct that, through action or omission, is contrary to the obligations set out in these General Principles or the set of internal regulations of each Group company in relation to conflicts of interest may constitute a disciplinary offence. In this case, the corresponding bodies of the CaixaBank Group companies that hold disciplinary powers will take the relevant actions in each case.

In addition, failure to comply with the provisions of these General Principles by Covered Persons who provide securities markets services is considered a serious or very serious violation under the terms set out in the regulation on securities markets.

⁵ This is without prejudice to the stipulations of the CaixaBank Board of Directors Regulations and of Royal Legislative Decree 1/2010, of July 2, which approves the revised text of the Companies Act, in relation to persons linked to members of the Board of Directors.

⁶ Persons who, without being considered employees, provide services to any CaixaBank Group entity, whether as freelancers or on behalf of another

3. Regulatory framework. Applicable standards and regulations

These General Principles shall be governed by the content of the applicable regulations, as well as by those that modify or replace them in the future. Specifically, on the date of this writing, the regulations applicable to the Group's parent company are as follows:

- Regulation (EU) 575/2013 of the Parliament and of the Council of 26 June 2013, on prudential requirements for credit institutions and investment firms.
- 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 investment firms.
- Act 10/2014, of 26 June, on the organisation, supervision and solvency of credit institutions.
- Royal Decree 84/2015 of 13 February, which implements Act 10/2014 of 26 June.
- Circular 2/2016 of 2 February of the Bank of Spain for credit institutions, on supervision and solvency.
- 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, for credit entities, on public and confidential reporting and financial statement models.

In the case of subsidiaries subject to foreign jurisdictions or complementary sector regulations, the policies and procedures that these subsidiaries develop will take into account, in addition to their own regulations, the obligations at the consolidated level contained in the regulations referenced above, as long as they do not contradict the specific requirements of the corresponding jurisdiction or sector regulations.

Finally, each Group company will develop the standards, guidelines or procedures that are necessary for the proper implementation, execution and compliance of these Principles.

Some, though not all, of the regulations regarding conflicts of interest issued by various regulatory bodies are outlined below, and comprise the regulatory context in which the General Principles are framed:

European Union

- Directive 2013/36/EC 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, regarding 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 organisational 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 as regards the encouragement of long-term shareholder engagement.
- EBA-GL-2021-05 Guidelines on Internal Governance.
- Directive (EU) 2016/97 of the European Parliament and of the Council of 20 January 2016 on insurance distribution.
- EBA-GL-2020-06-ES Guidelines on loan origination and monitoring.

- International Chamber of Commerce - ICC Conflicts of interest guidelines July 2018.

Spain

- Act 5/2021 of 12 April, which amends the revised text of the Spanish Corporate Enterprises Act, approved by Royal Legislative Decree 1/2010 of 2 July, and other financial regulations, as regards the promotion of long-term shareholder engagement in listed companies.
- Royal Decree 217/2008, of 15 February, on the legal regime of investment services companies and of other companies that provide investment services.
- Act 6/2023 of 17 March on Securities Markets and Investment Services.

The regulatory framework will be updated as part of the review of the General Principles so as to include any additional regulations and amendments relating to conflicts of interest that come into force.

4. General principles for managing the risk of conflicts of interest

4.1 Definition of Conflict of Interest

Based on the generic concept provided by the European Banking Authority (EBA), a conflict of interest is defined as a situation of conflict or discrepancy between the duty of an individual or legal entity and their private interests/the interests of another natural or legal person, which unduly influences the performance of their duties and responsibilities.

In order to establish common criteria for identifying potential conflicts of interest that may arise within CaixaBank Group companies, it will be necessary to determine whether any of the situations listed below occur:

- Receipt of an economic, political, personal or other benefit at the expense of another Covered Person and/or customer.
- Existence of an interest different to that of a Covered Person and/or customer in the outcome of the service or activity in question.
- Existence of financial or other incentives to favour the interests of a Covered Person and/or customer over those of third Covered Persons and/or customers.
- Engaging in a professional activity that is identical to that of the Covered Person and/or customer.
- Receipt of an incentive from a third party in relation to the service or activity, in money, goods or services, political or professional benefits, other than the usual fee or remuneration for the service or activity in question.

4.2 General Principles

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

- **General**, providing a framework for the Group's entities as a whole, capable of containing the internal regulations of the Group's entities under their umbrella.
- **Flexible**, so they can be applied in a way that is appropriate to the size and organisation of each Group entity, as well as to the nature, scale and complexity of its activity.
- **Permanent**, thus serving as a stable framework for dealing with conflicts of interest in the Group's companies.
- **Dynamic**, so they can be reviewed on a recurring basis in order to keep them applicable and effective.
- **Executable**, such that they can be applied and useful to address specific practical situations.

4.3 General Principles applicable to Covered Persons

Covered Persons, without prejudice to the specific duties and obligations set out in these General Principles, must provide services and carry out their activities in accordance with the guiding and inspiring principles set out in the "Code of Ethics". Therefore, and in compliance with their duty of loyalty, they must put the interests of customers, the Group and its shareholders before any personal interests in all their professional endeavours.

In addition, they must adhere to the following general principles of action:

- **Independence**. Covered Persons must at all times act with freedom of judgement, behaving in good faith and with loyalty to the Group, its shareholders and customers, regardless of their own interests or those of people who may be linked to them.

- **Restraint.** Covered Persons must refrain from intervening or influencing decision-making that may affect themselves, shareholders and/or customers with whom there is a conflict, and from accessing relevant or insider information that may affect said conflict.
- **Communication.** Covered Persons shall report on any conflicts of interest in which they are involved as a result of their activities outside the Group, their family relations, their personal assets, or for any other reason. This reporting will be mandatory in those cases expressly set out in the internal rules that implement these General Principles. Potential conflicts of interest will be reported through the communication channels established by the Group's companies. This report, if mandatory, must be made as soon as possible and, in any case, before taking the decision that may be affected by the conflict of interest.
- **Transparency.** When Covered Persons report a potential conflict of interest, they must provide accurate, truthful and understandable information in relation to the conflict of interest identified so that Regulatory Compliance can take an informed decision as to the continuity or not of the activity or service in question.

5. Framework for managing conflicts of interest

The procedures in the area of conflicts of interest described in this section shall apply to those entities that comprise the CaixaBank Group. Group entities that develop additional procedures in their field of activity must do so in a manner that is consistent with these General Principles.

5.1 Identifying conflicts of interest

Conflicts of interest may be grouped, depending on the subjects involved, into the following categories:

i Conflicts of interest between CaixaBank Group companies and their customers:

CaixaBank Group companies may incur a conflict of interest in relation to their customers when any of the situations described below occurs:

- Receipt of an incentive in the form of money, goods or services, political or professional benefits, or benefits other than the usual fee or remuneration for the service provided to the customer.
- Making use of the capacity of CaixaBank Group companies to influence or condition the customer's decision to the detriment of the customer.
- Making use of confidential information that places the CaixaBank Group companies in an advantageous position vis-à-vis the customer with regard to a service or activity.
- Prioritising the interests of CaixaBank Group companies by offering a product or providing a service that does not meet the customer's needs and is not carried out in the best conditions for the customer.
- Engage in the same activity as the customer, provided it results in an incompatibility that creates discrepancies between the interests of the two parties.

In order to avoid conflicts of interest with its customers, employees and members of the Board of Directors must not accept, either personally or through their Covered Persons⁷, gifts, favours, or other benefits from a customer, especially in relation to any transaction, except in circumstances accepted by social customs that are specified in CaixaBank's internal regulations.

ii Conflicts of interest between customers

A conflict of interest is identified when the CaixaBank Group entity promotes the preferential treatment of one of its customers over other customers of CaixaBank Group companies, as a result of economic or other ties, to the detriment of another customer.

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

To avoid situations of conflict of interest, the Directors of CaixaBank Group companies and related persons within the scope of their duties must refrain from:

- Using the name of the CaixaBank Group entity or invoking their status as a director to unduly influence the course of private transactions.
- Using the assets of the CaixaBank Group entity and leveraging their position in the Company to obtain a financial advantage or for any private purpose.
- Taking advantage of business opportunities that arise in connection with the Director's position within the company.
- Obtaining benefits or remuneration from third parties other than the Company and its Group for the performance of their duties.

⁷ Covered Persons are defined as those who are considered as such in the internal policies and rules that regulate the different areas

- Engaging in activities on one's own account or on behalf of others that involve actual or potential competition with the companies of the CaixaBank Group.
- Save for the exceptions provided for in the revised text of the Capital Companies Act and in the Regulations of the Board of Directors, engaging in any direct or indirect professional or commercial transactions with the CaixaBank Group entity.

iv Conflicts of interest between CaixaBank Group companies⁸ and their shareholders (including their representatives)

As part of the CaixaBank General Shareholders' Meeting, shareholders and their representatives may incur in a conflict of interest when attempting to reach an agreement that aims to:

- Release a shareholder from an obligation or grant them a right.
- Provide a shareholder any type of financial assistance, including the provision of guarantees in their favour.
- Release a shareholder from the obligations associated with the duty of loyalty legally established for directors.

v Conflicts of interest between employees, Associated Persons or Related Persons linked to the above and the companies of the CaixaBank Group.

Employees, Associated Persons or Persons Linked to the above may incur a conflict of interest when any of the situations specified below occur:

- Placing their interests before those of CaixaBank Group companies, interfering with their professional performance.
- Intervening in activities or transactions of any kind in which the employees or related persons themselves are direct or indirect beneficiaries or participants.
- Using any information that is accessed by virtue of one's condition, funds from CaixaBank Group companies, assets or intellectual property for personal purposes or for purposes unrelated to the Group's corporate objective. The situation will be particularly serious if it involves privileged or confidential information.
- Using the name of the CaixaBank Group or any entity of the CaixaBank Group to unduly influence the performance of an activity or service that results in an economic, personal, political or other benefit, and in a loss for the interests, values or reputation of any CaixaBank Group company.
- Leveraging one's position or status as an employee, Associated Person or Related Person linked to the above to obtain a financial advantage.
- Engaging in activities on one's own account or on behalf of others that create actual or potential competition to the company providing employment.

vi Conflicts of interest between CaixaBank Group companies and their suppliers

CaixaBank Group companies can incur a conflict of interest with their suppliers when any of the following situations occurs:

- The selection of suppliers is unduly influenced toward those to which employees of the CaixaBank Group companies/members of the governing bodies or persons linked to them have economic or family ties.
- Gifts, favours, or other benefits are received from a supplier, except in circumstances accepted by social customs that are specified in CaixaBank's internal regulations.
- Confidential information relating to economic, technical or other conditions presented by competing suppliers is disclosed in order to favour a third party.
- A proposal request is issued to contract a specific good or service that presents different requirements depending on the supplier receiving the request.

⁸ As applicable.

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 incur a conflict of interest when any of the following situations occurs:

- Confidential or privileged information is exchanged in relation to activities or services that are detrimental to the interests of customers or of the CaixaBank Group's own company.
- Undue influence is exerted over other departments in the performance of their activities or services.
- Parties participate simultaneously or consecutively in different services or activities, which creates a potential risk of injuring the interests of the customer or of the CaixaBank Group's own company.

viii Conflicts of interest between CaixaBank Group companies

CaixaBank Group companies may incur a conflict of interest with the Group when any of the situations described below, among others, occurs:

- Corporate development strategies or other structural modifications are implemented that would harm the interests of the Group or its companies.
- Products or services are approved and offered whose characteristics and distribution strategy are not suited to or address the needs of the target market, with the consequent damage to the interests and reputation of the Group as a whole.
- A brand is used that is contrary to the Group's positioning, values and attributes.
- Communications are sent to the market, investors, analysts, the media, or others, whose message is detrimental of the Group's interests.
- Preferential treatment is given to one of its customers over other Group customers as a result of economic or other ties.
- The name of the Group is used to unduly influence the performance of an activity or service that results in an economic, political or other benefit, and in a loss for the interests, values or reputation of the Group.

ix Other potential conflicts of interest

Any additional situations not covered in the aforementioned categories but that are likely to create conflicts of interest as a result of the services and activities provided, as well as of the relationships with various Covered Persons, shareholders, and/or customers, will also be identified.

5.2 Prevention Measures

CaixaBank Group companies will have measures to prevent any conflicts of interest identified. Some, but not necessarily all, of the main ones are detailed below:

- The Code of Ethics itself provides an element to mitigate conflicts of interest, based on the guiding principles set out therein and which must govern the activity of all persons subject to these General Principles.
- The Group promotes the definition and implementation of policies and procedures that establish best practices to prevent conflicts of interest by specific area of application, as well as common corporate frameworks of action that will constitute reference guidelines, which may be adopted by CaixaBank Group companies in their autonomous exercise of their responsibility to prevent conflicts of interest.
- As a result of the above, there will be an organisational structure in relation to the prevention and management of conflicts of interest to ensure that the provisions of the aforementioned policies and

procedures are adequately monitored, and to guarantee the existence of a solid and robust control environment. The current model, structured into three lines of defence, guarantees the proper segregation of duties.

- Existence of periodic reporting to Senior Management and the Governing Bodies that allows the verification of the existence of appropriate control procedures and the suitability of the measures taken.
- Establishment of specific training plans aimed at raising awareness and promoting honest and transparent professional behaviour as a measure to prevent potential situations of conflicts of interest related, among others, to inappropriate or personal use of the confidential information, IT resources, funds, goods or intellectual property of CaixaBank Group companies.
- All the information received from customers will be considered confidential, and must thus be processed in strict compliance with the applicable laws.
- In order to preserve this confidentiality, the companies of the CaixaBank Group will have the necessary barriers to prevent the misuse and undue transmission of information.
- The departments will be provided with sufficient human, financial, and material resources to ensure the autonomy, independence, and objectivity of their activities, and they will oversee those functions that involve performing sensitive activities or providing sensitive services that could present a risk of conflicts of interest.
- The biennial review and regular updating of these General Principles, adopting additional prevention measures as a result of the experience gained in the operating procedures of the CaixaBank Group companies.

5.3 Management Measures

The management measures applicable to Covered Persons, shareholders and customers are described below, as are the criteria for resolving conflicts of interest:

i Covered Persons and Shareholders

The employee who identifies a conflict of interest must handle it by following the procedures set out in the internal rules that implement these General Principles.

The directors of the CaixaBank Group companies must inform their respective Boards of Directors of any direct or indirect conflict of interest that they or persons linked to them may have vis-à-vis the interests of the CaixaBank Group companies. In this regard, and in accordance with the Group's firm commitment to act transparently, situations of conflict of interest incurred by the CaixaBank Group's directors will be presented in the report.

However, it will be possible to waive the prohibition on conflicts of interest outlined 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 the express authorisation of the Board of Directors or the General Meeting, depending on the specific case, in accordance with the provisions of Article 230 of Royal Legislative Decree 1/2010 of 2 July, which approves the revised text of the Spanish Companies Act.

Potential conflicts of interest involving shareholders will be reported through the communication channels established by the companies of the CaixaBank Group, and the Board of Directors will be responsible for managing them.

ii Customers

If customers identify situations likely to create potential conflicts of interest, they may report them through the communication channels established by the companies of the CaixaBank Group. The Regulatory Compliance Unit of the CaixaBank Group company will deal with the situations reported and will direct the investigation, to which end it may require the participation of other areas or departments of the CaixaBank Group company.

iii Criteria for resolving conflicts of interest

In all conflicts of interest that affect customers, the following criteria will be taken into account:

- In the event of a conflict between CaixaBank Group companies and a customer, the interests of the latter must be safeguarded.
- In the case of a conflict between customers:
 - No preference will be given to either;
 - Under no circumstances can the services or activities taken out by one customer be revealed to another;
 - No customer can be prompted to take out a service or activity in order to benefit another.

As for conflicts of interest that do not involve customers, they will be resolved, depending on their nature and characteristics, by following the procedures established in the internal rules that implement these General Principles, always under the premise of prioritising the interests of customers, the Group and its shareholders in all professional conduct.

5.4 Disclosing Conflicts of Interest

If the measures adopted by the CaixaBank Group companies are not sufficient to guarantee, with reasonable certainty, that conflicts of interest involving investment or ancillary services are eliminated, the CaixaBank Group will apply the procedures for communicating with and warning customers established in the applicable laws on Securities Markets.

5.5 Recording Conflicts of Interest

Conflicts of interest will be reported and recorded in accordance with the procedures established in the applicable internal rules.

Each CaixaBank Group company will keep an updated record of any conflicts of interest reported.

The communication and recording of information related to the disclosure phase of conflicts of interest in the area of investment or ancillary services will be subject to the provisions of internal regulations.

5.6 Making the General Principles available to Customers and Covered Persons

5.6.1 Customers

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

5.6.2 Covered Persons

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

5.7 Training for Covered Persons

Employees and members of the Board of Directors subject to the General Principles will receive ongoing training to ensure adequate knowledge of conflicts of interest. This training will place special emphasis on identifying, preventing, and managing conflicts in order to promote professional, honest and transparent performance.

Notwithstanding the fact that all Covered Persons must comply with the provisions of these General Principles, CaixaBank Group companies shall encourage shareholders and their representatives, Associated Persons and Related Persons who do not receive express training, to adhere to patterns of conduct and values that are similar to those that are established both in the General Principles and in the remaining internal regulations on conflicts of interest.

Regulatory Compliance in the CaixaBank Group will conduct recurring reviews to guarantee that the training plans of CaixaBank Group companies ensure that the relevant individuals have an appropriate and up-to-date qualification that aligns with both the regulatory requirements regarding conflicts of interest and the guiding principles set out in its Code of Ethics, taking into account the nature and characteristics of the activity they engage in.

It is the responsibility of the Regulatory Compliance Unit of the CaixaBank Group company or of the person designated for this task to review the following elements:

- The training plan currently implemented in the CaixaBank Group company.
- The curriculum of the courses taught to employees and members of the Board of Directors.
- Recipients of the courses by business area and category.
- Selection criteria for the target audience of the courses.
- Completion percentage.
- Measurement of the success and level of acceptance of the courses through internal surveys.
- Course frequency and duration.

Specific training plans will also be developed for employees who carry out their activity in areas that are more prone to have potential conflicts of interest, such as investment and ancillary services, and who require greater awareness of this subject.

Upon joining, employees and members of the Boards of Directors of the CaixaBank Group companies will receive information about the content of these General Principles, which are available to them and can be accessed through the corporate intranet.

5.8 Managing Exceptions and Specific Circumstances

Any situation resulting from local legal provisions that regulate conflicts of interest and require a specific procedure to incorporate said situation into the conflict of interest policies of the CaixaBank Group's companies will be:

- Reported to the Regulatory Compliance Unit of the CaixaBank Group company or to the person designated for this task.
- Submitted to the Group's Regulatory Compliance Department, which will act accordingly, taking into account the specific nature of the situation.