



Corporate policy on the internal reporting system

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Contents

1. Introduction	4
1.1 <i>Background</i>	4
1.2 <i>Scope</i>	4
1.3 <i>Purpose</i>	5
2. Scope of application	7
3. Regulatory framework Applicable standards and regulations	8
4. General principles of the internal reporting system	9
5. Guarantees	11
6. Governance framework	12
6.1 <i>CaixaBank governance bodies</i>	12
6.1.1 <i>Board of Directors</i>	12
6.1.2 <i>Risks Committee</i>	12
6.1.3 <i>Audit and Control Committee</i>	13
6.2 <i>CaixaBank's decision-making bodies involved in the internal reporting system</i>	13
6.2.1 <i>Management Committee</i>	13
6.2.2 <i>Global Risks Committee</i>	13
6.2.3 <i>Corporate Crime Management Committee at CaixaBank</i>	14
6.3 <i>CaixaBank Group companies</i>	14
6.3.1 <i>Governance bodies of Group companies</i>	14
6.4 <i>International branches and representative offices</i>	15
7. Management framework	16
8. Control framework	17
9. Reporting framework	18
10. Policy updates	19

1. Introduction

1.1 Background

On 21 February 2023, [Law 2/2023, of 20 February, governing the protection of persons reporting regulatory breaches and anti-corruption](#), was published in the Spanish Official State Gazette. Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law was therefore transposed into Spanish law with the approval of this Law.

In accordance with the Directive, Law 2/2023 aims to protect those people who use the internal reporting channels provided for such purpose to report any regulatory breaches detected in a work-related or professional context, thus providing adequate protection when dealing with any type of retaliation.

As of today's date, CaixaBank, S.A. ("**CaixaBank**" or the "**Company**") has included a procedure in its regulations on the Consulting and Whistleblowing Channel, which complies with the guiding principles and guarantees that inspire these regulations and that have served during their validity to strengthen the culture of regulatory compliance and contribute to the process of continuously assessing and improving the procedures, rules and controls in place to comply with the regulations.

In accordance with that set out in the above Law, the general regulatory framework that is currently in place for the economic group headed by CaixaBank (the "**CaixaBank Group**" or the "**Group**") has therefore been updated to bring it into line with the new regulations as regards protection for informants, and this corporate policy establishes the internal reporting system (the "**Policy**").

1.2 Scope

This Policy is the basic document that makes up the regulatory, operational and management framework of CaixaBank Group's internal reporting system.

The internal reporting system is the preferred channel, in general, for reporting actions or omissions that:

- May constitute breaches of European Union law, with the considerations established in Law 2/2023¹.
- May be considered serious or very serious criminal or administrative breaches².

This system is mainly used through the CaixaBank Group's Whistleblowing Channel.

CaixaBank categorically rejects any illegal or irregular conduct under the premise of having acted in favour of the Company, regardless of the potential economic benefit generated.

1 It includes any action/omission provided for:

- in the Annex of Directive (EU) 2019/1937, in particular in Part I, B, regarding [financial services, products and markets, and prevention of money laundering and terrorist financing](#); or,
- in Article 325 of the Treaty on the Functioning of the European Union (TFEU) on [measures to counter fraud](#);
- or,
- that affects the internal market in accordance with that established in Article 26 of the TFEU.

2 In any case, this will be understood to include all serious or very serious criminal or administrative breaches that involve [economic loss for the Public Treasury and for Social Security](#).

Regulatory compliance is the responsibility of each and every member of the organisation. In this regard and in accordance with the Code of Ethics, any information on any fact known that may constitute criminal offence, fraud and irregularity must be reported.

1.3 Purpose

The purpose of this Policy is to define the principles and premises that regulate the internal reporting system, the purpose of which is to provide informants with adequate protection against any retaliation when reporting any actions or omissions that may constitute breaches under the terms defined in the previous section.

The internal reporting system is set up as a tool to strengthen the culture of reporting and communication as an essential mechanism to prevent, detect and correct threats to the interest public and regulatory breaches, consolidate the framework for monitoring of integrity risk, and ensure compliance with the Code of Ethics in general and the internal regulation in particular.

The information provided by those that form part of the CaixaBank Group or that work closely with the Group is a valuable source in the prevention and earlier detection of these breaches as mentioned above.

The following [groups](#) have access to the CaixaBank Group's internal reporting system:

- Employees, executives and members of the governance bodies of CaixaBank Group companies,
- Interns,
- Workers of temporary employment agencies,
- Agents,
- Mediators,
- Collaborators,
- Opinion leaders,
- Suppliers and those that work for or under their supervision,
- Shareholders,
- Former employees, and
- Job candidates.

[Protection measures for the informants](#) will also be applied to:

- The legal representatives of the employees when carrying out their duties in advising and supporting the informant.
- Natural persons that, within the framework of the organisation providing the informant with these services, assist them in the process.
- Natural persons that are related to the informant and that may be at risk of retaliation, such as co-workers or family members of the informant.
- Legal entities that they work for or with which they have any other type of employment relationship or in which they hold any significant interests.

This policy sets out:

- General principles of the internal reporting system
- Guarantees
- Governance framework
- Management framework
- Control framework
- Reporting framework

CaixaBank has a separate section on its [corporate website](#) that can be easily identified and that provides sufficient and adequate information on the matters detailed in this Policy.

2. Scope of application

This is a corporate-level Policy. The content of this Policy is therefore applicable to all CaixaBank Group companies subject to the regulations. The Governing Bodies of these companies will make the decisions necessary to integrate the provisions of this Policy. They will apply the principle of proportionality to adapt the governance framework to the idiosyncrasy of their structure of Governing Bodies, committees and departments, and their principles of action, methodologies and processes to the contents of this document.

This integration may involve, among other decisions, the approval of their own policy by the subsidiary. The approval will be necessary in subsidiaries that need to adapt the contents of this Policy to their own specific characteristics, whether due to the matter in question, 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 at 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 related subsidiaries will be informed at least of the existence of this corporate policy and its application to such subsidiaries. The Governing Bodies of subsidiaries will abide by this corporate policy when the operational principles of the corporate policy are applicable and the subsidiary does not have its own policy, and the content of the corporate policy lays out principles, obligations and activities that apply directly to the subsidiary.

In any case, the person responsible for the internal reporting system will ensure that the integration of this Policy into the subsidiaries is proportionate, that any policies approved by the subsidiaries are in line with the corporate policy, and that it is consistently applied throughout the CaixaBank Group.

Lastly, in addition to being a corporate policy, this Policy is also considered to be the individual policy of CaixaBank, the parent of the CaixaBank Group.

Failure to comply with that set out in this Policy may lead to disciplinary action by the internal bodies authorised to take such action. In the case of any commercial relationship with third parties, the existing contractual relationships may be terminated.

3. Regulatory framework *Applicable standards and regulations*

This Policy will be governed by the applicable regulations in force and any regulations that may amend or replace them in the future. At the date of preparation, the applicable regulations in force included the following:

- Directive (UE) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the **protection of persons who report** breaches of Union law.
- [Law 2/2023, of 20 February, governing the protection of persons reporting regulatory breaches and anti-corruption.](#)
- Organic Law 10/1995, of 23 November, on the **Criminal Code** and its subsequent amendments.
- Circular 1/2011 of the Public Prosecution Service, of 1 June, regarding the **criminal liability of legal entities** following the reform of the Criminal Code implemented by Organic Law 5/2010.
- Circular 1/2016 of the Public Prosecution Service on the **criminal liability of legal entities** following the reform of the Criminal Code implemented by Organic Law 1/2015.
- [Royal Decree Law 11/2018, of 31 August, on transposing EU directives with regard to anti-money laundering.](#)
- Organic Law 3/2018 on the protection of personal data and guarantee of digital rights, which aims to bring Spanish law into line with Regulation (EU) 2016/679 of the European Parliament and the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.
- Royal Legislative Decree 4/2015 approving the consolidated text of the Spanish Securities Market Law.
- CNMV Circular 1/2020, amending Circular 5/2013, of 12 June, which establishes the annual corporate governance report models for listed companies, savings banks and other issuers of securities admitted to trading on regulated markets; and Circular 4/2013, of 12 June, which establishes models for the annual report on remuneration of directors of listed companies and of the members of the board of directors and control committees of savings banks that issue securities admitted to trading on regulated markets.
- Guidelines of the Spanish Data Protection Agency (AEPD) on data protection in employment relationships.

In addition, this Policy takes into account other Spanish and international standards in the matter, such as:

- ISO 37002 Standard - [Management Systems for Reporting Irregularities.](#)
- ISO 37301 Standard - [Compliance Management Systems.](#)
- UNE 19601 Standard - [Criminal Compliance Management Systems.](#)
- ISO 37001 Standard - [Anti-bribery Management Systems.](#)

With regard to [subsidiaries or, where applicable, branches subject to foreign jurisdictions or additional sector regulations](#), any policies and procedures implemented by these subsidiaries or branches will take into account, in addition to their own regulations, the obligations at the consolidated level contained in the above regulations, provided that they do not contradict the specific requirements of the corresponding jurisdiction or sector regulations.

Finally, the necessary frameworks, rules, guidelines or procedures for correct implementation, execution and compliance with this Policy will be implemented at each of the Group companies or, where applicable, branches.

4. General principles of the internal reporting system

The general principles on which the internal reporting system is based are as follows:

- **Commitment of the Governing Bodies**

The CaixaBank Board of Directors is responsible for implementing the internal reporting system through the approval of this Policy and the management procedure. This Policy represents the highest Governing Body's commitment with respect to its scope and relevance.

Its responsibilities include appointing the individual responsible for managing the system or *person responsible for the system* and their removal or dismissal.

- **Independence and autonomy**

The Group's *Compliance Officer* is the person responsible for the CaixaBank Group's internal reporting system and is ultimately responsible for the Group's regulatory compliance function, such that they carry out their duties independently and with autonomy with respect to the Company's other bodies, cannot receive any instructions as regards the work carried out and have all material and human resources necessary to perform these duties.

To guarantee the objectivity of its decisions, the Regulatory Compliance Department will operate under the principal of functional independence with regard to those areas over which risk supervision and monitoring is carried out.

Likewise, under the terms envisaged in the [corporate regulatory compliance policy](#), it is an autonomous function with sufficient initiative to carry out their duties, without needing to receive any specific instructions from other areas or act on their behalf. They are authorised at any time to ask questions, request information, initiate or call for assessment and verification processes and investigations, and adopt any other measure or procedure to help ensure the successful completion of the process for managing the internal reporting system.

The CaixaBank regulatory compliance function has sufficient resources necessary to carry out the activities and assume the responsibilities assigned so that the internal reporting system is suitable and appropriate, ensuring that positive outcomes are achieved.

With the aim of strengthening the independence and objectivity of and the respect for the guarantees offered by the internal reporting system, the person responsible for the system may choose to outsource part of the management process to external experts after obtaining approval from the corresponding authority or internal function.

Everyone that carries out their duties within the framework of managing the internal reporting system has the knowledge, experience, qualification and requirements of professional integrity necessary to carry out their task with due guarantees.

- **Channel integration**

The internal reporting system integrates the various internal reporting channels of the CaixaBank Group companies included, thereby ensuring compliance with management standards and guarantees at all companies.

These channels, with the CaixaBank Group's main channel being the Whistleblowing Channel, allow written communications to be submitted through the corporate platform, by email and by post. Access to these channels is announced in internal environments and the section of the corporate website mentioned above.

In any case, and at the request of the interested party, communications can also be submitted at face-to-face meetings.

- **External reporting channel**

Without prejudice to the access channels detailed above, any interested party may contact the independent informant protection authority or competent autonomous body at any time.

- **Good faith**

The communications sent through the reporting system must always be submitted in good faith. Communications will be considered to have been submitted in bad faith if they impersonate another informant's identity or specify facts that are known to be uncertain or involve people with which they have not had any relationship with respect to such facts, even if they are certain.

Legal actions or disciplinary measures, where applicable, will be taken against any person that has submitted a communication that is false or sent in bad faith. In addition, it may also constitute a criminal offence in accordance with current law.

5. Guarantees

The CaixaBank Group's internal reporting system provides the following guarantees:

- **Confidentiality**

Confidentiality is a guiding principle that is followed in any activity within the framework of managing the internal reporting system.

The system is designed, established and managed securely, so as to guarantee the confidentiality of the identity of any informant and any third party mentioned in communications and of the actions carried out in managing and processing these communications, as well as data protection.

Access to information is limited to those persons with management powers based on the functions assigned to them, and the disclosure of any type of information on communications is expressly prohibited.

- **Protection measures**

CaixaBank expressly forbids and will not tolerate any action that constitutes any type of retaliation, or any threat of or attempt at retaliation against those that submit a communication in relation to the actions or omissions detailed in point 1.2. of this Policy, or against anyone who participates in or assists with the investigation process, provided that they have acted in good faith and have not taken part in the event being reported.

To guarantee compliance with this principle, the measures necessary to ensure the protection of the informant will be adopted. If necessary given the circumstances, CaixaBank will adopt mitigating measures aimed at isolating and/or moving the informant from their workplace.

The measures aimed at protecting the informant will be detailed in the regulations and internal implementing procedures.

- **Anonymity and non-traceability**

The communications sent to the internal reporting system may be registered, in other words the informant is identified, or may be anonymous.

CaixaBank is firmly committed to protecting the person's anonymity when this option is chosen by the informant.

Tracking and tracing anonymous communications is prohibited. Failure to comply with this point will entail the adoption of the corresponding disciplinary measures.

- **Rights of affected individuals**

The presumption of innocence and honour of those individuals affected is guaranteed, along with their right to be heard. Those individuals that may be affected by an internal investigation have the right to be made aware of the communication filed against them as soon as the appropriate verifications are carried out, the case has been granted leave to proceed and it is considered suitable to guarantee the successful completion of the investigation.

6. Governance framework

The pillars on which the governance framework of the internal reporting system is based are as follows:

- Compliance with the principles contained in this Policy by CaixaBank Group companies within their scope of application.
- Corporate supervision of the parent company.
- Alignment of strategies among the Group companies and, in turn, alignment with best practice, supervisory expectations and current regulations.
- Maximum involvement of the Governing Bodies and management of the Group companies.
- The internal control framework based on the Three Lines of Defence model, which insures the strict distribution of functions and the existence of several layers of independent control.

6.1 CaixaBank Governing Bodies

The Governing Bodies of CaixaBank, as parent of the CaixaBank Group, perform certain functions related to their responsibility to approve and oversee the strategic and management guidelines established in the interests of all Group companies, as well as the supervision, monitoring and integrated control of the Group's risks as a whole.

6.1.1 Board of Directors

The CaixaBank Board of Directors, as the body ultimately responsible for establishing the general strategies and policies of CaixaBank, is in charge of the following:

- The approval of this **corporate policy on the internal reporting system**, which establishes the framework for the functioning and operation of the CaixaBank Group's internal reporting system, thus complying with legal provisions and that established in the CaixaBank Code of Ethics.
- The appointment of the individual responsible for managing the system or **person responsible for the system** and their removal or dismissal.
- The approval of the **reporting management procedure**.

The Audit and Control Committee will be responsible for supervising the implementation of the corporate policy on the internal reporting system within the framework of the regulatory compliance function, which includes monitoring and taking actions aimed at resolving any deficiencies and weaknesses detected.

6.1.2 Risks Committee

The Risks Committee advises CaixaBank's Board of Directors on the Group's overall risk appetite and its strategy to this end. Within the framework of the internal reporting system, this Committee:

- Proposes to the Board the approval of this Policy in coordination with the Audit and Control Committee.
- Monitors the degree of adaptation of the assumed risk to the previously agreed profile and ensures that Group operations are consistent with the established tolerance levels.
- Determines, in cooperation with the Board of Directors, the information that the Board of Directors must receive and establishes the information that the Committee must receive, in

such a way that knowledge of exposure to this risk has a sufficient presence in the decision-making process.

- Oversees regulatory compliance risk in its scope of action and decision-making, detecting any risk of non-compliance and monitoring this risk and examining possible shortcomings in an ethical manner.
- Verifies that the Group has the means, systems, structures and resources, in accordance with best practices, which allow for the implementation of its conduct and compliance risk management strategy.

6.1.3 Audit and Control Committee

The Audit and Control Committee supervises the efficacy of the internal control systems, ensuring that the policies and systems in place are effectively applied. It also supervises and assesses the efficacy of financial and non-financial risk management systems.

Additionally, and pertaining to the company's inherent area of activity, the Audit and Control Committee of CaixaBank:

- Proposes to the Board the approval of this Policy in coordination with the Risks Committee.
- Reports to the Board of Directors, in advance, on the financial information and non-financial information that CaixaBank must periodically release to the markets and its supervisory bodies.
- Oversees the effectiveness of the internal control over financial reporting (ICFR) and non-financial reporting (ICNFR) system and determines the level of trust and reliability of the system.
- Ensures that the Internal Audit unit endeavours to ensure the correct functioning of the reporting and internal control systems, verifying their suitability and integrity.
- Establishes and supervises the mechanism that allows CaixaBank or Group employees and other persons related to the Bank, such as directors, shareholders, suppliers, contractors or subcontractors, to report confidentially and, if deemed appropriate, anonymously, any potentially significant irregularities, through the internal channels that form part of the internal reporting system, including financial, accounting or any other type of irregularity related to the Bank, that they notice within the Company or its Group, receiving periodical information on its functioning, and proposing any actions considered relevant for improvement and reducing the risk of irregularities in the future.

6.2 CaixaBank's decision-making bodies involved in the internal reporting system

6.2.1 Management Committee

The Management Committee is responsible for developing the consolidated Strategic Plan and Budget approved by the Board of Directors. In carrying out this task, the Committee passes resolutions directly or through its decision-making committees regarding the internal reporting system and informs the Audit and Control Committee and the Risks Committee.

Furthermore, the Management Committee adopts resolutions affecting the Company's organisational activity. It also approves the likes of structural changes, appointments, expense lines and business strategies.

6.2.2 Global Risks Committee

The CaixaBank Global Risks Committee reports to the Risks Committee and is responsible for globally managing, controlling and monitoring, in addition to other aspects, conduct and compliance risk, as well as the implications on liquidity and capital adequacy management and capital consumption.

It therefore analyses the global positioning in relation to this risk and establishes, either directly or through its decision-making committees, the policies or procedures that optimise its management, monitoring and control within the framework of the CaixaBank Group's strategic objectives.

The Committee is specifically responsible for adapting the strategy in this area to what is set out in the risk appetite framework by the Board of Directors, coordinating measures to mitigate any breaches and reactions to early warnings, as well as keeping CaixaBank's Board of Directors informed through its Risks Committee of the main lines of action and status of the CaixaBank Group.

6.2.3 Corporate Crime Management Committee at CaixaBank

The CaixaBank Corporate Crime Management Committee (CCMC) is responsible for overseeing the operation of and compliance with the crime model. It is a top-tier committee that has independent powers of initiative and control, and the capacity to submit queries, request information, propose measures, initiate investigation procedures and undertake any other process necessary in relation to crime prevention and any matter with potential criminal relevance. This multidisciplinary committee reports to CaixaBank's Global Risks Committee at least once every six months and to the Corporate Crime Management Committee itself whenever considered necessary.

The CCMC will report to the Management Committee and to the Governing Bodies through the Risks Committee attached to the Board (without prejudice to the functions ascribed to the Audit and Control Committee in supervising the CaixaBank Group's internal control system and internal reporting system) when the Corporate Crime Management Committee plans to submit matters to the Board of Directors.

In addition to the responsibilities assigned to the Corporate Crime Management Committee in relation to the crime model, the CCMC also regularly receives general information on the functioning of the internal reporting system and determines those actions to be carried out regarding the evaluation, legal assessment or implementation and improvement of measures to control those specific cases where there are indications of potential criminal offences.

6.3 CaixaBank Group companies

6.3.1 Governing Bodies of Group companies

The Governing Bodies of each of the companies that form part of the scope of companies included in the internal reporting system:

- Must take the appropriate decisions in order to incorporate the provisions of this Policy and apply the guidelines established therein, in accordance with the specific features of each of the companies and with any legal or regulatory provisions that may be applicable to them.
- Will ensure that the staff of the regulatory compliance function take the appropriate actions to ensure that everyone is aware of the existence, guarantees and management model of the internal reporting system.

- Will ensure that the appropriate measures arising from the conclusions reached as a result of managing the communications are implemented.
- Will ensure that the appropriate diligence is provided to the CaixaBank Regulatory Compliance Department in managing the communications.
- Will establish mechanisms for monitoring and escalating any issues regarding the internal reporting system.

6.4 International branches and representative offices

The persons responsible for the regulatory compliance function of the **international branches and representative offices** of the international network will encourage and promote compliance with this Policy within the scope of their remit.

In any case, application of this Policy at subsidiaries, international branches and representative offices **outside Spain** must be preceded by an analysis of their content in relation to the regulatory requirements of the relevant jurisdiction, thus ensuring that this adaptation guarantees, at the very least, compliance with this Policy and the local regulatory requirements of the jurisdiction where they are based. Any deviation from or exception to compliance with the content of this Policy must be expressly approved beforehand by the CaixaBank Regulatory Compliance Department.

7. Management framework

The management framework is detailed in the [reporting management procedure](#), which must be approved by the CaixaBank Board of Directors, the main aspects of which are detailed on the corporate website, and that establishes the projections necessary so that the internal reporting system complies with the requirements determined by law.

The procedure envisages the participation of different areas that guarantee the protection of autonomy and independence in all phases of the process.

Although the communications are always managed on an individual basis in all existing internal channels, the phases that are applicable to all communications are receipt, assessment, analysis, investigation and resolution, applying in all cases the measures for informing and notifying those involved in the process.

8. Control framework

CaixaBank promotes a risk culture at the Group that encourages risk control and compliance, and the establishment of a robust internal control framework that covers the entire organisation and that allows for fully informed decision making about the risks assumed.

The internal control framework of the CaixaBank Group follows the three lines of defence model, which ensures the strict segregation of functions and the existence of several layers of independent control:

- The **first line of defence** will be integrated into the operating units that effectively manage conduct and compliance risk. These units will be responsible for implementing internal policies and procedures in relation to regulatory compliance; they will proactively implement measures for identifying, managing and mitigating the conduct and compliance risk; they will establish and implement suitable controls.
- The compliance function, as an internal control function that forms the **second line of defence** for conduct and compliance risk, will ensure the quality of the entire process for managing the regulatory compliance function; it will ensure that the internal policy is consistent with public guidelines on the processes related to compliance with the policy; it will carry out specific conduct and compliance risk appetite controls; it will provide guidance on the design and review of regulatory compliance processes and on the monitoring to be put in place in the management units for these risks. In particular, and within the scope of action specific to the Company, the *Compliance* Department acts as a second line of defence in the management of conduct and compliance risks.
- The internal audit function, as the **third line of defence**, is an independent and objective function for assurance and consultation; it is designed to add value and improve Group operations. It plays an important role in achieving the strategic objectives of the CaixaBank Group, providing a systematic and disciplined approach to evaluating and improving risk control and management processes and corporate governance. In particular, Internal Audit will supervise the activities of the first and second lines of defence so as to provide reasonable levels of assurance to senior management and the Governing Bodies.

The Three Lines of Defence model is implemented in the Group in such a manner that the internal control duties of the parent company fulfil their mission with a consolidated overview of the Group companies. The *Compliance* Department and Internal Audit Department, which are respectively the areas responsible for the compliance and internal audit functions at the parent, assume the strategic direction, supervision and coordination of the corresponding internal control duties of the subsidiaries, while ensuring their scope.

Each of the CaixaBank Group companies must ensure the existence of controls over the adequate application of the general principles established in this Policy, as well as its development in internal frameworks and procedures for compliance management.

9. Reporting framework

An appropriate reporting framework must be established in order to manage the internal reporting system.

The main objectives of this reporting framework are as follows:

- Provide Governing Bodies and senior management with precise, clear and enough information sufficiently in advance to help them make decisions and enable them to verify that operations are being carried out within the set risk tolerance level.
- Meet the reporting requirements of regulatory bodies.
- Keep shareholders and other CaixaBank Group stakeholders informed.
- Provide the managers of the various departments, in particular, the management and control areas, with the necessary information to monitor compliance with the strategy established for the Group.
- Provide the managers of the various departments, in particular the management and control areas, with the necessary information to monitor compliance with the strategy established for the Group in managing the internal reporting system.

The person responsible for the internal reporting system:

- [May request the necessary information](#) to ensure compliance with the legal provisions for the different areas and Group companies, and
- Will provide relevant information on the internal reporting system to the Governing Bodies and to senior management on a regular basis.

10. Policy updates

This Policy will be reviewed by the Board of Directors once every three years. However, as the body responsible for the Policy, the CaixaBank *Compliance* Department will review its contents annually and, when deemed appropriate, will propose amendments to be submitted to the Board of Directors for approval.

In addition, the Policy may be updated at any time at the request of any of those involved in conduct and compliance risk management when they have identified the need to do so as a result of:

- Changes to the regulatory framework.
- Changes in the business strategy and goals.
- Changes in management approach or processes.
- Changes deriving from the results obtained during follow-up and control activities.
- New policies or amendments to existing ones that affect the content of this Policy.
- Changes to the organisational structure that involves a change in the conduct and compliance risk management function.

As part of the review procedure, the party responsible for the Policy will:

- Share the results of the analysis carried out with all others involved in conduct and compliance risk management and make the necessary changes to the Policy.
- Include a summary of the review carried out in the "Version control" section of the Policy.
- Propose to the Global Risks Committee the submission of the review to the Risks Committee and the Audit and Control Committee for approval before submitted to the Board of Directors for approval.

However, minor changes made outside the default (three-year) period may be approved by the Global Risks Committee. For these purposes, minor modifications are understood to be those resulting from organisational changes without implications for compliance risk management functions, purely typographical corrections or as a result of updating the documents referenced in the Policy.³ In this case, the Audit and Control Committee and the Risks Committee shall always be informed of the changes approved by the Global Risks Committee. If considered appropriate by the Audit and Control Committee, any changes would be submitted to the Board of Directors, and the Risks Committee would also be informed.

Furthermore, the *Compliance* Department will be responsible for the storage and accessibility of this Policy and will ensure that the filing, distribution and, where applicable, publication processes are functioning correctly.

This Policy is made available to all CaixaBank Group professionals and employees, business partners and third parties through its publication in a separate section that can be easily found on the CaixaBank corporate website, which provides suitable and sufficient information on different aspects of this Policy.

³ The updating of the documents referenced in the Policy would include only the transcription of excerpts of documents approved by the competent bodies (Board of Directors, Global Risks Committee, etc.) or of regulatory provisions, provided that the amended content is not subject to regulation by the Policy.