

A photograph of a middle-aged man with grey hair, wearing a grey blazer, light blue shirt, and patterned tie, smiling and looking towards a woman. The woman is seen from the side, with dark hair pulled back, wearing a light-colored blazer. They are in a professional setting with a wooden wall and a large white abstract logo in the background.

Code of Ethics of CaixaBank Asset Management Luxembourg

24 June 2025

Contents

1. Our identity and mission	2
2. It applies to every one of us	3
3. Action Principles	4
3.1 Compliance with current laws and legislation	5
3.2 Respect	6
3.3 Integrity	8
3.4 Transparency	10
3.5 Excellence and professionalism	12
3.6 Confidentiality	12
3.7 Social responsibility	13
4. Regulatory Compliance function	13
5. Internal information system – Whistleblowing channel	15
Appendix 1 - Decision-making guide	16

1. Our identity and mission

Our corporate and social initiatives are based on the corporate values of quality, trust and social commitment.



Quality: the desire to serve our customers by offering them excellent treatment and the products and services most suitable to their needs.



Trust: The result of integrity and professionalism. We cultivate it through empathy, dialogue, being open and accessible.



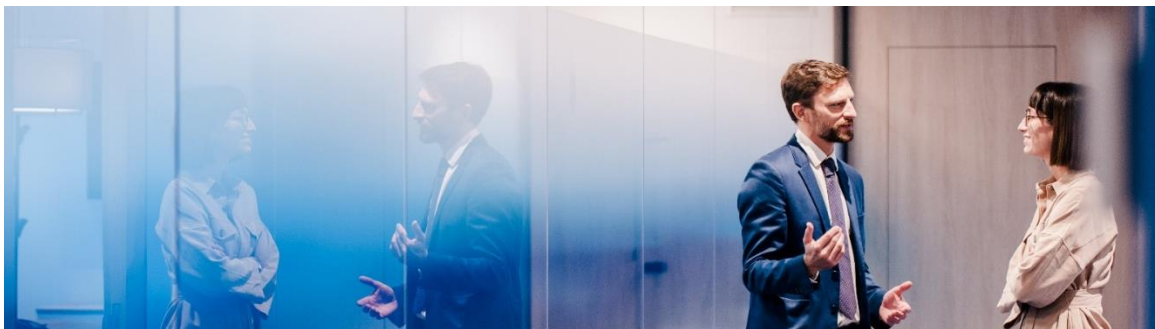
Social commitment: not only creating value for customers, shareholders and employees, but also contributing to the development of a fairer society with more equal opportunities. This shaped our beginnings, it is our very essence; what makes us stand out and makes us unique.

At CaixaBank, as a credit institution and the head of a group (hereinafter, "CaixaBank Group" or "the Group"), our mission is to fully meet the banking needs of our customers, through an appropriate and complete range of products and excellent service quality, while maintaining the commitment to contribute value to customers, shareholders, employees and society at large.

Our corporate culture can be traced to our founding roots and forms part of the way we go about everything we do at the CaixaBank Group. Based on our corporate values of quality, trust and social commitment, its essence is reflected in the action principles reflected in our Code of Ethics, which are mandatory and form the backbone of the Group's internal policies and the decision-making process at all levels of the Company. It also extends to our suppliers.

At CaixaBank, we are committed to carrying out our activity in accordance with the most rigorous legal and ethical standards and the highest standards of professional conduct, in the interest of our customers, the community and all parties who in one way or another come into direct contact with us.

1. By approving this Code, the Board of Directors of CaixaBank, S.A. highlights the ethical values and principles that underscore its business, and which must duly govern the activity of CaixaBank and all its employees, managers, executives and officers. At CaixaBank, we do not ignore, excuse or tolerate behaviour that conflicts with these values and principles.



2. As a consequence of the above, the Board of Directors of CaixaBank Asset Management Luxembourg S.A. ("CABK AM LUX" or "The ManCo"), adheres to the Code of Ethics of its parent company, CaixaBank, in all applicable aspects.

| 2. It applies to every one of us

1. This Code applies to all CaixaBank employees, managers and members of CaixaBank's governance bodies. We are all are required to know and comply with the Code.
 2. In our professional work, in our internal professional relationships with the Company and in the external relationships with shareholders, clients, suppliers and society in general, we must respect the values, principles and guidelines in this Code.
 3. This Code is corporate in nature, meaning it applies to the entire CaixaBank Group and is an important document for all Group companies. The Governing and Management bodies of said companies shall adopt the appropriate decisions for the purpose of integrating the provisions in this Code, either by approving their own Code in accordance with the principles set out in this document or by adhering to the duly adapted CaixaBank code, where applicable.
 4. Violations of this Code of Ethics shall be punishable in accordance with the stipulations of the Workers' Statute, the applicable Collective Agreement and other applicable regulations.
 5. The values and principles set out in this Code are passed on to CaixaBank Group suppliers through the Supplier Code of Conduct, which disseminates and promotes the aforementioned values and principles in our suppliers' activities, as well as to third parties whose contractual relationship requires compliance with them.
 6. The Code is available on CaixaBank's corporate website, as well as the compliance and sustainability web portals. CABK AM LUX will make the Code available on its corporate website.
-

Appendix 1 – Decision-making guide contains a questionnaire to help to make decisions in line with what is set out in this Code.



3. Action Principles

Our fundamental principles of action are compliant with the laws and regulations in force at all times, respect, integrity, transparency, excellence, professionalism, confidentiality and social responsibility.

Our business conduct places people at the centre and bases its commitment on the strictest legal and ethical requirements reflected in this Code of Ethics, such as: transparency when dealing with our customers, shareholders and investors; anti-money laundering; the fight against corruption and bribery; not contracting direct lobbying or interest representation services to position itself with authorities; and strict compliance with the personal data protection regulations.

In line with the CaixaBank Group's corporate culture, our business conduct is rooted in solid corporate governance, forming part of the decision-making process and making it possible to achieve the sustainable development of any project. At the same time, we encourage this being extended to the entire value chain.

CABK AM LUX ensures that its internal policies and procedures are aligned with the values and principles of action set out in this Code.

3.1 Compliance with current laws and legislation

Our actions are guided by the respect for laws and other regulations in force at all times.

I. The principle of respect for the law

1. CaixaBank is committed to complying with the effective laws and legislation at all times as well as internal regulations and directives. In order to facilitate knowledge of current legislation and internal regulations and thereby ensure compliance with them, at CaixaBank, we provide regular training on matters that have an impact on the development of our activity.
2. At CaixaBank, we strictly comply with the regulations in the Crime Prevention Model, as well as prevent, detect, avoid and, where applicable, report possibly illegal acts. At CaixaBank, we categorically reject any conduct of an illegal or criminal nature or that involves a breach of internal regulations, under the premise of operating in favour of the Company regardless of the possible financial benefit created.
3. In the performance of our duties, we must always act legally, ethically and professionally, in compliance with all laws, regulations and other legislation that is legally required. Our code of business conduct and our reputation cannot be compromised.
4. We must all cooperate with any internal or external investigation or audit performed by or in CaixaBank.

II. Money laundering and financing of terrorism

1. Combating money laundering and terrorist financing is a priority for us. In accordance with prevailing legislation, we have our own obligatory internal rules and regulations for the prevention of money laundering and the financing of terrorism, which includes compliance with international financial sanction programmes.
2. Should any questions arise in the course of our daily activities in this area, we must immediately consult with our superiors or with those responsible for the prevention of money laundering at the Bank.

III. Risk prevention, health and well-being

1. Preventing risks and ensuring the health and well-being of the workers is a fundamental priority for CaixaBank. This is why, in addition to strictly complying with all applicable regulations, we have an Internet portal on the CaixaBank Internet where all employees can review internal regulations, policies and information on risk prevention, health and well-being. Furthermore, we believe that caring for our well-being is not simply a legal or ethical obligation, but it is about building a culture of care and commitment in our organisation.
 2. At CaixaBank, we implement measures and policies that promote a safe and healthy working environment. In this regard, we have developed our occupational risk prevention manual and policy. Additionally, on our intranet, we provide preventative information on health and well-being at work, as well as instructions and action protocols needed in the event of any incidents.
-

3. At CaixaBank, we also value of emotional and mental health and safety. We offer programs and benefits that help to maintain a balance between work and personal life and provide a respectful and collaborative work environment that encourages open communication and mutual support.

IV. Judicial or administrative proceedings

1. We are required to actively and diligently collaborate with the Company as per the instructions we receive from Legal Advisory to defend the interests of CaixaBank before any legal, arbitration or administrative body.
2. In particular, it will be mandatory for us to appear before any legal, administrative and/or arbitration bodies when we receive a direct subpoena from said bodies either at a personal or business address when so requested by the Legal Advisory Department. In turn, we must collaborate with the Entity where so requested to prepare and/or answer an appearance or statement in any procedure.
3. If we receive, either at our personal or professional address, a summons, resolution or notification from a judicial, administrative or arbitration authority for events related to the performance of our duties at CaixaBank, we must report it through the circuits established in the internal regulations, always informing a superior.

3.2 Respect

We respect the people, cultures and their diversity, institutions, pluralism of the areas where we operate and the environment.

I. Respect for people

1. In CaixaBank assume as a key value of activity the respect for the person and its dignity, and we subscribed in its entirety the Universal Declaration of adopted Human Rights by the United Nations that understands the Universal Declaration of Human Rights, the International Pact on Civil Rights and Politicians and the International Pact on Economic, Social and Cultural Rights. We also accept and respect the ILO Declaration on Fundamental Principles and Rights at Work and the Charter of Fundamental Rights of the European Union.
 2. We must be respectful towards the people who work in the bank and, in general, towards any person who interacts with the bank.
 3. At CaixaBank, we interact with the people who work at the bank and in general with any person who interacts with it in a fair manner, regardless of their sexual identity, gender expression, sexual orientation, ethnic origin, nationality, beliefs, religion, political opinion, affiliation, age, marital status, disability and other situations protected by law.
 4. We reject all forms of discrimination, harassment, bullying, intimidation, abuse and any conduct that may be considered offensive, improper or inappropriate. At CaixaBank, we reject any sexual proposals or suggestions and any other actions that may be offensive to a person's dignity.
 5. We encourage team supervisors to promote a work-life balance among the people who work at the Company, as well as equal opportunities among male and female employees based on
-

meritocracy and in accordance with prevailing legislation and agreements signed with workers' representatives and other institutions that support diversity, equal opportunities, wellness and work-life balance.

II. Respect for cultures and their diversity

At CaixaBank, we respect the local cultures of the communities and countries where we operate and their diversity. We embrace an active and engaged attitude towards the different communities and countries, contributing to their progress and socioeconomic development.

III. Respect for institutions

We interact with institutions, including public administrations, always in accordance with applicable law, respecting the institution and collaborating appropriately with them.

IV. Respect for political pluralism

1. We respect the political pluralism of the societies where we do business, and as a result, all our activity is governed by the principle of political neutrality.
2. Any connection, membership or collaboration with political parties or with any other type of entities, institutions or associations with public purposes shall be carried out in a clearly marked personal nature, avoiding involving or compromising the name, corporate image or legitimate interests of CaixaBank.

V. Respect for the environment

We worked to limit the environmental impact resulting from our activity and operations. We take action to increase our business' positive impact and promote a sustainable future for society and the environment.



We consider the direct and indirect impacts on the environment resulting from our actions and comply with the criteria established in our internal policies on the environment and climate change.

3.3 Integrity

By having integrity, we generate trust, a fundamental value for CaixaBank.



General principles

1. The trust of shareholders, customers and, in general, of all individuals within our areas of operations underpins our business activity. This trust can only exist if our integrity is beyond all reproach.
2. At CaixaBank, we believe in free, honest and fair competition. We have internal regulations on competition law, mainly aimed at ensuring compliance with competition standards.
3. While at work, we may sometimes have doubts as to the right decision or path we should take. Common sense should prevail in these cases, and we must remember to ask ourselves the questions in *Appendix 1 - Decision-Making Guide*. In any case, we have the **CaixaBank Query Channel** available for us.
4. For matters related to CABK AM LUX, please refer to the [CABK AM LUX Whistleblowing Policy](#) available on the corporate website.



Anti-corruption

1. At CaixaBank, we actively reject any action or omission that is directly or indirectly related to acts of corruption in all the markets where we operate. With this objective, we have the **Corporate Anti-corruption Policy**, which is an essential tool to impede CaixaBank, Group companies and its external collaborators from directly, or through intermediaries, engaging in conduct that may be against the law or the core business principles of CaixaBank.
2. These standards of conduct set out in this Policy include our corporate criteria for accepting and giving **gifts** and for travel and hospitality expenses.



Conflicts of interest

1. At CaixaBank, we respect the private lives of our employees and do not interfere in their activities or actions outside the scope of their work at the bank, provided that such activities or actions do not affect our good name or our legitimate interests.
 2. Our reputation depends, among other things, on the image we convey to the public through the activities carried out across all areas of business and our conduct. Therefore, we are not to use or involve CaixaBank's name or image in private activities, especially those that may draw public attention in the media or on social media. We reject any practice that goes against our values and principles of conduct in any situation.
-

3. We are required to work in the interest of CaixaBank and are prohibited from personally profiting from opportunities arising within our professional activity or from the use of CaixaBank's assets and information, and from benefiting third parties through the use of said assets and information. We have zero tolerance for putting personal interests before those of the customers or CaixaBank and its shareholders.
4. We must avoid any real or potential conflict of interest, including those derived from kinship or similar relationships. In such situations, the person affected by the conflict of interest must refrain from becoming involved or participating in the related negotiation or transaction. Consequently, we must not get involved in transactions that involve a personal interest or an interest of any related person or entity. We must not use confidential and privileged information available to us as a result of our professional activity for our own benefit or for the benefit of a third party.
5. We have mandatory internal rules regarding the prevention of conflicts of interest in different areas. We must follow these rules both to avoid such conflicts and ensure the general principles of integrity and transparency set out in this section. These regulations provide an overall framework, general principles and procedures for addressing conflicts of interest, the highest specification of which is the CaixaBank Group's Corporate Conflicts of Interest Policy, which includes the obligation for employees to report certain activities that could entail a conflict of interest due to their nature, internal rules of conduct in the securities market and rules for granting risk concessions to persons connected with the bank.



Internal Code of Conduct

1. The Internal Code of Conduct applies to all employees under the scope of the securities market. Individuals who work in areas related to securities markets or who have regular access to inside information have additional obligations regarding their personal operations.
2. If we operate in the securities market, we must not engage in transactions with financial instruments for which we have inside information or recommend third parties to acquire or transfer them. Furthermore, we are not to engage in transactions that involve market manipulation of financial instruments by transmitting false or misleading signals or impacting the price or volume of financial instruments.

If inside information is available, it must be reported to the Compliance Department via the [Queries Channel](#) available on the CaixaBank intranet.

3. If we identify suspicious customer transactions involving the use or attempted use of inside information or market manipulation or attempted market manipulation, we must also notify the Compliance Department using the reporting form available on the Compliance portal on the CaixaBank intranet.
 4. In the case of CABK AM LUX, the Management Committee is responsible for ensuring the effective day-to-day implementation of the CABK AM LUX Code of Conduct, including adherence to rules governing Personal Transactions. Additionally, on an annual basis, all Conducting Officers are required to complete and submit a declaration form confirming their compliance with the Code of Conduct.
-



Protection of CaixaBank's assets

1. We must safeguard CaixaBank's property and assets, which may only be used for its proper and legitimate purposes.
2. We must adhere to the regulations concerning use of resources, computer security regulations and intellectual property rights for the programs used at the Company, all in accordance with the internal regulations in this regard and, in particular, with the provisions of the Telematic Code of Conduct. We may not use unapproved programs on the Bank's computer terminals.

The tangible and intangible property and assets that we create for CaixaBank as part of the professional service provider relationship, whether we use its resources or not, belong to CaixaBank, even after our relationship with the Bank has ceased.

3.4 Transparency

We are transparent in the performance of our activity. With the aim of ensuring that our customers are properly informed. Our main policies and relevant information about our activities are published on our corporate website.



Transparency to society

At CaixaBank, we are committed to honesty, transparency and compliance with applicable regulations in our dealings with society as fundamental values of our actions.



Transparency to customers and shareholders

1. At CaixaBank, we provide our customers with appropriate explanations of the characteristics of the products and services we offer in a precise, clear and truthful manner so that they can freely choose the product or service that best suits their needs and interests, ensuring that they are aware of and understand the risks associated with or inherent to these products and services.
 2. In every phase of product and service marketing, clients' needs and interests take precedence over our own, acting with honesty and transparency in information. It is important to guarantee an adequate level of protection by implementing transparency measures with support from informational material and the provision of the necessary pre-contractual and contractual documentation in each case to ensure proper marketing in line with the customer's needs and guarantee a long lasting relationship of trust.
 3. At CaixaBank, we promote advertising that is clear, sufficient, balanced, objective and not misleading in simple, easy-to-understand language, without omitting necessary information, creating false expectations or providing misleading information about the characteristics of the product or service offered, so that the recipient can make an informed decision about the products and services advertised.
-

4. At CaixaBank, we design and adapt the selection of products and services for customers' interests, goals and characteristics with the aim to satisfy the real needs of the people they are intended for.
5. All of us must at all times have the necessary and up-to-date knowledge and expertise for the products and services we are marketing. To this end, we must undertake the necessary mandatory and ongoing regulatory training courses, including, but not limited to, training on the Real Estate Credit Contracts Act (LCCI), the Markets in Financial Instruments Directive (MiFID) and the Insurance Distribution Directive (IDD).
6. We have a Customer Service department responsible for dealing with and resolving customer complaints, which is independent from the commercial and operational areas of CaixaBank. Its resolutions are based on customer protection regulations for financial services and on the values and principles set out in this Code. One of this service's objectives will be to avoid legal disputes with customers through applying general strict adherence to the supervisors' guides.
7. We provide our shareholders and institutional investors with all relevant financial and corporate information in accordance with current regulations and in compliance with CaixaBank's communication and contact policy for shareholders, institutional investors and advisors with a vote.



Transparency in the relationship with suppliers

1. We contract suppliers based on free competition and disregarding any relationship or interference outside our interests. Without prejudice to economic and technical conditions, collaborative relationships with suppliers must create value for both parties. Goods must be purchased and services engaged objectively and transparently, avoiding situations that could affect the objectiveness of the people involved. Therefore, there should be no family, economic or friendship ties with suppliers.
2. We will only contract with suppliers who operate in accordance with best practices in ethical, social and environmental issues, as well as good corporate governance. Furthermore, we require our suppliers to exhibit strict respect for human and labor rights and encourage them to include conduct aligned with our values in their practices and transmit them to their value chain.
3. The values and principles set out in this Code are passed on to CaixaBank Group suppliers through the Supplier Code of Conduct.



Transparency in relationships with the media for communication

When we act as representatives of CaixaBank at public events, interviews, conferences, courses or in any other circumstance where it may be understood that our opinions, statements or information disseminated may be attributable to CaixaBank, or if our professional activity or actions, albeit one-off, have repercussions in the media, we must consult with our superior and, if applicable, with the communication and institutional relations department, which is responsible for relations with the media and managing CaixaBank's corporate profiles on social networks.

3.5 Excellence and professionalism

We work rigorously and effectively. Excellence constitutes one of CaixaBank's fundamental values. For this reason, we place our customers' and shareholders' satisfaction at the centre of our professional activity.

I. Serving our customers

1. At CaixaBank, we place customers at the centre of our activity. As part of this commitment, we create value for our customers and the communities where we operate.
2. We are committed to act honestly and to uphold our professional responsibility in all our customer relationships.
3. We carry out in-depth studies of our products and services before offering them to customers.

II. Commitment to our shareholders and investors

The relationship that we have with our shareholders and investors is governed by transparency, approachability and active listening criteria. At CaixaBank, we have adopted the highest standards and best practices in corporate governance, reporting on its compliance with the recommendations for good governance contained in the Unified Good Governance Code of Listed Companies.

III. Professionalism and teamwork

1. Our greatest asset is the people who make up CaixaBank and the values and principles that motivate them. We respect and promote diversity, valuing the skills and contributions of each person.
2. As a team, we are guided by a sense of commitment, dedication and a drive for excellence.

3.6 Confidentiality

We uphold the confidentiality of the information that our shareholders and customers entrust in us.

1. Confidentiality of information regarding our customers, employees, members of management and governance bodies, suppliers and shareholders is the cornerstone of the trust underlying our entire business.
 2. Current regulations and internal rules on personal data protection and privacy must be respected.
 3. CaixaBank protects the personal information of its customers, shareholders, employees, members of its management bodies and any natural or legal person related to the Company. CaixaBank also requires third-party suppliers or companies with which it has dealings to safeguard the confidentiality of the information they may obtain through their contractual relations with CaixaBank.
 4. Covered parties will only use information received from shareholders, customers, suppliers and employees for the purpose for which it was disclosed, in accordance with applicable legislation. Access to information that is not strictly required to carry out a particular job is prohibited. Before sending information to third parties, the people involved should ensure that they are authorised to
-

do so and that there is a legitimate reason for this. Even where authorisation is given, the information disclosed must be limited to the absolute minimum required under the circumstances. When in doubt, employees should consult their supervisor or, depending on their identity, the Department of Information Security at CaixaBank or Data Protection Officer.

3.7 Social responsibility

We have a commitment to society in conducting our business.

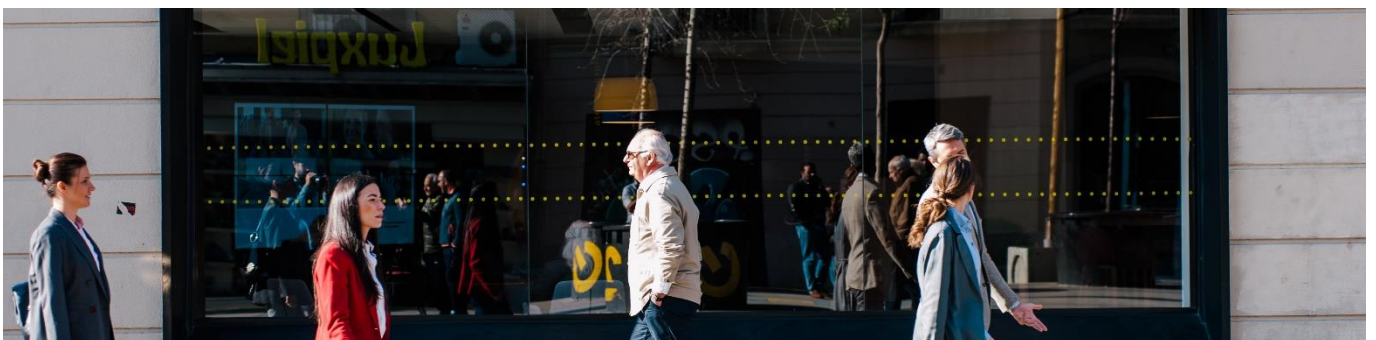
I. Social and environmental responsibility

1. It is essential to integrate our respect for human rights, equal opportunities and environmental sustainability into its objectives, in addition to financial gain. In this way, maximizing shared value creation is targeted for interest groups and long-term relations are established based on trust and transparency.
2. We must manage the business and its products and services within the framework of this commitment to protecting both the environment and people. We must coherently support the most environmentally-friendly initiatives and projects that contribute to prevent, mitigate and respond to climate change. CaixaBank shall contribute to the transition towards a carbon neutral, sustainable and inclusive economy.
3. We must act in a manner consistent with the Sustainability Business Principles and Human Rights Principles.

II. Adherence to national and international covenants

We joined the Principles of the United Nations Global Compact. Adhesion to these principles entails a wide-ranging commitment to social responsibility and sustainability, with the aim of mainstreaming this attitude throughout our entire value chain.

We are involved in many important national and international partnerships and initiatives aimed at jointly advancing sustainability issues and exchanging best practices in this area.





4. Regulatory Compliance function

The mission of the regulatory compliance function is to identify, evaluate, supervise and report on the risks of sanctions or financial losses to which the Bank is exposed, as a result of the breach of or defective compliance with laws, regulations, legal or administrative requirements, codes of conduct, ethical standards or good practices, relating to the scope of action. It also advises, reports to and assists Senior Management and the Governance Bodies.

Its mission is structured around the supervision of the compliance risk arising from processes and activities carried out; fostering, championing and promoting the corporate values and principles; and the promotion of a culture of control and compliance with the laws and legislation in force that permit and favour their integration into the management of the whole organisation.

CABK AM LUX's Regulatory Compliance Department prepares, evaluates and encourages the implementation of the provisions of this Code of Ethics, using training, information and awareness-raising actions to promote a culture of compliance throughout the organization, and addresses any questions on its interpretation through the internal channels provided.

5. Internal information system – Whistleblowing channel

CaixaBank has an Internal Information System that comprises the various internal information channels, including the Whistleblowing Channel as the main channel for reporting actions or omissions that may represent breaches of European Union law or that may constitute a serious or very serious criminal or administrative offence, as set out in the Corporate Policy of the internal information system. Likewise, it is a means of facilitating the rapid and confidential communication of possible irregularities that may entail breaches involving acts or conduct, past or present, relating to the scope of the Code of Ethics and the Standards of Conduct set out in the aforementioned Policy. Communications may be submitted anonymously.

Complaints are managed and resolved by using a rigorous, transparent and objective procedure, safeguarding in all cases the confidentiality of the persons concerned and involved in the facts and conduct that are the subject of communication.

CaixaBank expressly prohibits and will not tolerate any act of retaliation against those who in good faith report events or situations that may fall under prohibited conduct as set out in this Code of Ethics. Along these lines, CaixaBank continually works to align communication channels with best practice at all times.

Customer complaints and claims will be handled through the service channels provided by CaixaBank.

The Channel is accessible through the Compliance site on the intranet, from the financial terminal, from the suppliers' portal for this group and via the internet. All the information about this Channel can be found on CaixaBank's corporate website.

At CABK AM LUX, individuals who wish to report potential breaches of the Code (Whistleblowing Alert) or seek clarification regarding its interpretation or application (Consultation) should follow the procedure indicated in the CABK AM LUX Whistleblowing Policy. This approach is required as CABK AM LUX has not yet been integrated into the Corporate Information System.

Appendix 1 – Decision-making guide

If, when performing your professional duties, we come across a dilemma about which we need to make a decision, use common sense and take the following into account when weighing it up:

- ✓ Is this decision/action/omission **legal**?
- ✓ Would I feel **comfortable explaining** this decision/action/omission to colleagues, superiors, relatives or friends?
- ✓ Have I taken into account **the interests of all** those who may be affected by this decision/action/omission?
- ✓ Am I sure I am doing the **right thing**?
- ✓ **If** my behaviour were made **public**, would it be deemed appropriate **and professional**?
- ✓ If the reply to any of the questions is **"NO"**, the question needs to be **rejected or checked**.

In any event, you may contact the Queries and Whistleblowing Channel.
