

Statement of Principal Adverse Impacts of investment decisions on sustainability factors

CaixaBank Wealth Management Luxembourg, S.A.

2221007YM6XY7PI28I04

1. Summary

CaixaBank Wealth Management Luxembourg, S A (hereinafter, "CaixaBank Wealth Management Luxembourg" or the "Entity") considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on the principal adverse impacts on CaixaBank Wealth Management Luxembourg's sustainability factors.

This statement of the principal adverse impacts on sustainability factors covers the reference period from 1 January 2024 to 31 December 2024.

The guidelines and format laid down in Annex 1 of the Regulatory Technical Standards (hereinafter "RTS"¹) have been followed to the extent possible when preparing this statement.

CaixaBank Wealth Management Luxembourg is committed to sustainable development and is aware of the vital role of financial institutions in directing financial resources to activities that are beneficial to society as a whole. It upholds its commitment to evolving towards a sustainable economy.

Fulfilling the requirements of Regulation (EU) 2019/2088² on sustainability-related disclosures in the financial services sector (hereinafter, "SFDR") was approved with the aim of promoting the transparency on the way in which the participants in the financial markets integrate sustainability risks into their investment decisions and processes.

CaixaBank Wealth Management Luxembourg, as a participant in the financial market, considers the Principal Adverse Impacts on Sustainability (hereinafter, "PAIS") in its own and third-party investment products and in the discretionary portfolio management delegated to CaixaBank Asset Management S.G.I.I.C., S.A.U. (hereinafter, "CaixaBank AM"). Both CaixaBank Wealth Management Luxembourg and CaixaBank AM consider Environmental, Social and Governance (hereinafter, "ESG") criteria when selecting the third-party products included in advice proposals or managed assets, respectively. In this regard, a due diligence process is conducted to identify, prevent, mitigate, and explain how these impacts are addressed.

The CaixaBank Group (hereinafter, the "Group" or "CaixaBank Group") has a framework of sustainability policies to ensure that its activity contributes to sustainable development. These notably include the Discretionary Portfolio Management Engagement Policy (hereinafter the "Engagement Policy") and the Operating Principles of the Corporate Policy

¹ Delegated Regulation (EU) 2022/1288

² You can find the Regulation at the following link [EUR-Lex - 32019R2088 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/eli/reg/2019/2088/oj)

for Managing Sustainability/ESG Risks, which enable us to systematically analyze and monitor the Principal Adverse Impacts and, where necessary, to take the appropriate mitigation measures. These measures may take the form of not investing, divesting, reducing exposure or placing certain assets and issuances under observation, thus initiating the required engagement actions, where applicable.

This statement presents the average monthly value of the PAIS indicators in relation to the positions in the discretionary management portfolios of CaixaBank Wealth Management Luxembourg customers, in direct and indirect investment, both in corporate fixed income and public debt, as well as in equities, which as of December 2024 amounted to € 1.039.657.676 for the purposes of the SFDR Regulation.

The results of the PAIS indicators provided in this 2024 Statement are presented solely and exclusively for comparative purposes and correspond to those included in the "Statement of Principal Adverse Impacts (PAI) of investment decisions on sustainability factors" referring to the fiscal year 2023. The results of some of the PAI indicators corresponding to the year 2024 are not comparable with those of the previous year due to the evolution of the methodologies applicable to the calculation of the indicators, as well as the modification in the scope and perimeter of data reported with respect to the previous reference period.

The results of the PAIS indicators provided for 2024 in this statement are not comparable to the results published in the "Statement of Principal Adverse Impacts (PIA) of investment decisions on sustainability factors"³ for the previous financial year 2023. This is due to the developments in the methodologies used to calculate the indicators, as well as a change in the scope and perimeter of the data reported between the current and previous fiscal years.

³ You can find the previous Statement at the following link:

<https://www.caixabankwealthmanagement.lu/deployedfiles/luxemburgo/Estaticos/pdfs/PAIS-Statement-DPM-2023.pdf>

2. Description of the principal adverse impacts on sustainability factors

Before going into the details in the table, it is important to consider the following points:

- The statement displays the average monthly value of the PAIS indicators for positions held in the discretionary management portfolios of CaixaBank Wealth Management Luxembourg clients, encompassing both direct and indirect investments in corporate and government bonds, as well as equities. The average assets under management for 2024 total 758.105.137 euros for the purposes of SFDR (excluding cash positions and derivatives).
- The calculation base for the indicators applicable to investments in companies is 536.778.378 euros and for the indicators applicable to investments in sovereign and supranational entities is 192.881.232 euros.
- During the year of 2024 the monthly assets under management for the purposes of SFDR has increased significantly from 501.810.815 euros in January 2024 to 1.039.657.676 in December 2024, which hinders the comparability between the years.
- The indicators have been calculated by taking the average assets of each month during the year. The greater frequency of the data for calculating the average gives a more reliable image of the average assets and the value of the indicators during the year, provided that the latter is available.
- The indicators results have been obtained from information pertaining to the data provider MSCI Inc. At present the indicator data include exposure to both direct investment and third-party vehicles.

Indicators applicable investments in investee companies⁴

Sustainability indicator in relation to adverse impacts	Parameter	Impact 2024	Impact 2023	Impact 2022	Explanation	Action taken, actions planned, and targets set for the next reference period
INDICATORS RELATED TO CLIMATE CHANGE AND OTHER ENVIROMENT-RELATED INDICATORS						
Greenhouse gas (GHG) emissions	1. Greenhouse gas emissions⁵ (GHG emissions)	Scope 1 GHG emissions.				
	Volume of GHG emissions generated by the companies in which CaixaBank Wealth Management Luxembourg invests. Sum of absolute CO ₂ emissions, whether reported or estimated, calculated according to the value of the investment in each company. <i>(tCO₂e)</i>					
		Scope 2 GHG emissions.				
		Scope 3 GHG emissions.				
		Total GHG emissions (Scopes 1, 2 and 3)				
	2. Carbon Footprint <i>(tCO₂e/€M EVIC)</i>	GHG emissions of investee companies per million euros of enterprise value.				
	3. GHG intensity of investee companies <i>(tCO₂e/€M sales)</i>	GHG emissions of investee companies per million euros of sales.				
	4. Exposure to companies active in the fossil fuel sector⁵ (%)	Share of investments in companies active in the fossil fuel sector.				

	5. Share of non-renewable energy production and consumption <i>(%)</i>	Proportion of non-renewable energy consumption and non-renewable energy production of investees from non-renewable energy sources versus renewable energy sources (share of total energy sources)	Production: 64.6% Consumption: 70.0%		67.9%		72.7%		Coverage of the indicator; 63% / 44% (73% in 2023) (75% in 2022)
	6. Energy consumption intensity per high impact climate sector <i>(GWh / Millions of EUR revenue)</i>	Energy consumption in GWh per million EUR revenue of investee companies, per high climate impact sector	Energy consumption intensity of the NACE A sector	0,4	Energy consumption intensity of the NACE A sector	1.7	Energy consumption intensity of the NACE A sector	0.2	Coverage of the indicator; 44% (77% in 2023) (77% in 2022)
		Energy consumption intensity of the NACE B sector	1.0	Energy consumption intensity of the NACE B sector	0.8	Energy consumption intensity of the NACE B sector	0.2		
		Energy consumption intensity of the NACE C sector	0.5	Energy consumption intensity of the NACE C sector	5.2	Energy consumption intensity of the NACE C sector	0.2		
		Energy consumption intensity of the NACE D sector	2.5	Energy consumption intensity of the NACE D sector	2.1	Energy consumption intensity of the NACE D sector	0.2		
		Energy consumption intensity of the NACE E sector	1.6	Energy consumption intensity of the NACE E sector	0.2	Energy consumption intensity of the NACE E sector	0.2		
		Energy consumption intensity of the NACE F sector	0.2	Energy consumption intensity of the NACE F sector	0.3	Energy consumption intensity of the NACE F sector	0.2		
		Energy consumption intensity of the NACE G sector	0.5	Energy consumption intensity of the NACE G sector	1.5	Energy consumption intensity of the NACE G sector	0.2		
		Energy consumption intensity of the NACE H sector	1.7	Energy consumption intensity of the NACE H sector	0.6	Energy consumption intensity of the NACE H sector	0.2		
		Energy consumption intensity of the NACE L sector	0.6	Energy consumption intensity of the NACE L sector	0.57	Energy consumption intensity of the NACE L sector	0.2		

Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas (%)	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	9.7%	0.3%	0.1%	Coverage of the Indicator; 96% (94% in 2023) (87% in 2022)	See note on Action taken, actions planned, and targets set for the next reference period below.
Water	8. Emissions to water <i>(Tons of emissions to water / Million EUR invested)</i>	Tons of emissions to water generated by investee companies per million EUR invested (weighted average).	0.9%	0.5%	0.0%	Coverage of the indicator; 2% (1% in 2023) (7% in 2022)	See note on Action taken, actions planned, and targets set for the next reference period below.
Waste	9. Hazardous waste and radioactive waste ratio <i>(Tons of hazardous and radioactive waste / Million EUR invested)</i>	Proportion of investments in companies that have been involved in breaches of the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises	26.7	10.7	7.3	Coverage of the indicator; 40% (32% in 2023) (29% in 2022)	See note on Action taken, actions planned, and targets set for the next reference period below.

INDICATORS ON SOCIAL AND LABOUR ISSUES, RESPECT FOR HUMAN RIGHTS AND THE FIGHT TO COMBAT CORRUPTION AND BRIBERY

Social and labour issues	10. Violations of the principles of the UN Global Compact and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises <i>(%)</i>	Proportion of investments in companies that have been involved in breaches of the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises	0.2%	0.8%	0.8%	Coverage of the indicator; 98% (95% in 2023) (87% in 2022)	See note on Action taken, actions planned, and targets set for the next reference period below.
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11. No compliance processes and mechanisms to monitor compliance with the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises (%)	Proportion of investments in companies with no policies to monitor compliance with the principles of the UN Global Compact or the OECD Guidelines for Multinational Enterprises or with no complaints or grievance handling mechanisms to address breaches of the principles of the UN Global Compact or the OECD Guidelines for Multinational Enterprises	7.2%	41.7%	42.3%	Coverage of the indicator; 96% (95% in 2023) (87% in 2022)	See note on Action taken, actions planned, and targets set for the next reference period below.
12. Gender pay gap, unadjusted (%)	Unadjusted average gender pay gap of investee companies	13.5%	14.6%	15.8%	Coverage of the indicator; 32% (27% in 2023) (20% in 2022)	See note on Action taken, actions planned, and targets set for the next reference period below.
13. Gender diversity of the board of directors (%)	Proportion between the number of women on the board of directors and the total number of board members (men and women) of investee companies ⁴ .	36.7%	35.6%	35.6%	Coverage of the indicator; 94% (90% in 2023) (83% in 2022)	See note on Action taken, actions planned, and targets set for the next reference period below.
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical and biological weapons) (%)	Proportion of investments in companies engaged in the manufacture or sale of controversial weapons	0.1	0.1	0.1	Coverage of the indicator; 97% (94% in 2023) (87% in 2022)	See note on Action taken, actions planned, and targets set for the next reference period below.

Indicators applicable to investments in sovereign and supranational entities ⁶							
Environmental	15. GHG intensity <i>(tCO₂e/€bn GDP)</i>	GHG intensity of investment host countries	219.2	246.5	240.4	Coverage of the indicator; 96% (97% in 2023) (100% in 2022)	See note on Action taken, actions planned, and targets set for the next reference period below.
Socials	16. Investment host countries subject to social breaches <i>(Nº y %)</i>	The number of investment host countries subject to social breaches (absolute number and relative number, divided by all investment host countries) covered under international treaties and conventions, United Nations principles and, where applicable, national laws	Absolute: 5.8 Relative: 6.3%	Absolute: 2.3 Relative: 2.8%	Absolute: 0.0 Relative: 0.0%	Coverage of the indicator; 96% (64% in 2023) (0% in 2022)	See note on Action taken, actions planned, and targets set for the next reference period below.
Other indicators of the principal adverse impacts on the sustainability factors							
Indicators related to climate change and other additional environment-related indicators							
Issuances	4. Investments in companies with no carbon reduction initiatives <i>(%)</i>	Percentage of investments in companies with no carbon reduction initiatives to fulfil the Paris Agreement	37%	30%	30.4%	Coverage of the indicator; 96% (92% in 2023) (80% in 2022)	See note on Action taken, actions planned, and targets set for the next reference period below.
Additional indicators on social and labour issues, respect for human rights, and the fight to combat corruption and bribery							
Human rights	14. Number of detected cases of serious human rights issues and incidents <i>(No.)</i>	Number of cases of serious human rights issues and incidents linked to companies invested in on a weighted average basis	0.0	0.0	0.0	Coverage of the indicator; 97% (93% in 2023) (85% in 2022)	See note on Action taken, actions planned, and targets set for the next reference period below.

⁴ The calculation basis was based on assets amounting to € 211.255.962,09€, 509.549.479 € and 1.039.657.676 € for 2022, 2023 and 2024, respectively.

⁵ Scope 1 refers to emissions directly generated by the activity of the investee companies, Scope 2 refers to indirectly generated emissions resulting from the energy consumed by the investee companies and Scope 3 refers to indirect emissions generated in the value chain, including both the upstream and downstream emissions of the investee companies.

⁶ Companies active in the fossil fuel sector means companies that derive any revenues from (i) exploration, extraction, distribution or refining of hard coal and lignite; (ii) exploration, extraction, distribution (including transportation, storage and trade) or refining of liquid fossil fuels; and (iii) exploration and extraction of fossil gaseous fuels or from their dedicated distribution (including transportation, storage and trade).

Note Action taken, actions planned, and targets set for the next reference period.

The CaixaBank Group is dedicated to sustainable development and recognizes the pivotal role that financial institutions play in directing financial resources toward activities that benefit society at large. The bank reaffirms its commitment to advancing a sustainable economy.

CaixaBank Wealth Management Luxembourg shares these Group objectives. The volume of assets under management is relatively small which introduces volatility in the PAI indicators and still hinders an active data driven management of the indicators. The Bank is and will leverage on the Group ESG initiatives to improve the coverage and management of PAI. Reference is made to the Group declaration https://www.caixabank.com/deployedfiles/caixabank_com/Estaticos/PDFs/Sostenibilidad/DeclaracionCABK_Incidencias_Adversas_eng.pdf, which list initiatives planned, and concrete actions taken. The policies details in section 3 contains the applicable framework, which will promote the overall objective.

3. Description of policies to identify and prioritize the impact of Principal Adverse Impacts on Sustainability

The CaixaBank Group has established a corporate framework for sustainable investment that applies to the provision of discretionary portfolio management and investment advisory services.

Below we contextualise how the investment framework for integrating environmental, social and governance (ESG) factors into investment analysis is established, which in turn enhances and is fed back into regular due diligence processes.

Within this broad framework, CaixaBank has a set of policies to identify and prioritise PAIs on sustainability factors. These policies are kept up to date, reviewed regularly (at least once a year) and approved by the relevant governing bodies.

As regards the allocation of responsibility for the application of policies within the framework of organisational policies and procedures, the three lines of defence model is applied, in which the first line of defence is responsible for applying policies, the second for monitoring their effective application, and the third for auditing them.

3.1 Responsible investment framework

The CaixaBank Group has established a corporate framework for investment governing the provision of discretionary portfolio management services, based on three central pillars:

1. **Integrating both ESG factors** (including controversy monitoring) and traditional financial criteria into investment decisions and analysis relating to discretionary portfolio management service:
 - Among other factors, material ESG indicators for the sector or company as well as sustainability ratings are taken into account in the investment selection and analysis. These indicators and ratings take into account the adverse impacts of issuers and sustainability risks which, were they to materialise, could adversely affect the value of the investment.
 - CaixaBank AM also actively monitors any serious sustainability controversies that could be associated with an issuer in its portfolio or investment universe (which may include incidents relating to biodiversity, water, waste or human rights).
 - PAIs linked to greenhouse gas emissions (PAI 1–6) are managed in this environment; PAI 15 and additional environmental PAI 4), biodiversity (PAI 7), water (PAI 8) and waste (PAI 9) are managed.
2. **In terms of sector exclusions and restrictions**, CaixaBank AM's Sustainability Risk Integration Policy also establishes the following:
 - CaixaBank AM may decide against investing in issuers or countries that gravely breach the core principles contained in the UN Global Compact, particularly regarding human rights, labour rights, environmental protection, and anti-corruption efforts. Similarly, it may opt out of investing in issuers that potentially pose a material risk of failing to honour their climate change commitments, including those related to the decarbonisation of their portfolios. Moreover, it enforces specific exclusions and restrictions for activities connected with thermal coal, oil and gas, weaponry, and oil sands.

- This environment is used to monitor PAIs relating to breaches of the UN Global Compact and the OECD Guidelines for Multinational Enterprises (PAI 10), infractions in countries with social breaches (PAI 16), companies with severe human rights problems and incidents (PAI 14 additional social indicator), and involvement with controversial weaponry (PAI 14).

3. Long-term engagement through dialogue actions carried out through CaixaBank AM with both issuers and third-party fund managers, with the aim of improving and changing behaviours in relation to certain relevant matters, including, when discovered, adverse incidents or ways to improve the management of impacts, both positive and negative. Potentially applies to all PAIs.

In this framework, and in order to determine the existence of possible adverse impacts, CaixaBank AM periodically assesses the performance of the PAI indicators against the results obtained in the immediately preceding period. An adverse impact on sustainability factors may be deemed to exist when there is evidence of a material deterioration in the performance of these indicators; or, for some indicators, when certain thresholds established through CaixaBank Group policies or procedures, which include restrictions on investment in certain activities or sectors, are exceeded.

In particular, the Group has policies in place to exclude or restrict investments in companies found to be in breach of the principles of the UN Global Compact (following a process of case analysis and remediation assessment), in breach of key international treaties and standards, or which have exposure to controversial sectors.

In any case, should an adverse impact be identified, CaixaBank AM will assess it in accordance with the criteria set out in the Sustainability Risk Integration Policy, application procedure, and Engagement Plan for the relevant financial year.

These measures may take the form of not investing, divesting, reducing exposure or placing exposure under observation. These measures may consist of not investing, divesting, reducing exposure or placing under observation. These measures may be complemented, where appropriate, by the exercise of active ownership through engagement measures such as dialogue and/or the exercise of voting rights to which CaixaBank AM is entitled in proportion to its shareholding in the investee company (excluding discretionary portfolio management, as there is no delegation of the exercise of voting rights by the client).

In the defined methodology, no scenario analysis, probability of occurrence analysis, or margins of error are applied. As regards the source of the data, MSCI is engaged as the main data provider. When the lack of coverage or data quality does not allow for active management of any adverse impacts that may occur, CaixaBank AM works alongside the data provider to improve the coverage and quality of the data as much as possible to obtain greater reliability for subsequent years, and will also review data sources from other providers.

3.2 Sustainability policies

These policies make up a framework of control to avoid events that could lead to adverse impacts on sustainability, as well as to minimise them to the extent possible:

Principles of action of CaixaBank's Corporate Sustainability/ESG Risk Management [March 2025]⁵

The purpose of this policy is to establish the principles, premises and mechanisms to ensure that the ESG risks associated with customers and proprietary investments are governed, managed and controlled such that they comply with the expectations of the Group's stakeholders. The contents contained in the policy include: a regulatory framework, a system of governance, management, and control, as well as the corporate strategy regarding ESG risks, among other elements. It governs the management of the social and environmental impacts of investee companies' activities.

CaixaBank AM Sustainability Risk Integration Policy [May 2025]⁶

The Sustainability Risk Integration Policy lays out the principles for incorporating ESG criteria into the processes and decision-making for providing investment services—together with traditional financing criteria—from a risk perspective that is defined as the ESG situation or condition that, if it were to happen, could have a negative material impact on the value of the investment.

Broadly speaking, this Policy governs investments carried out on behalf of others in respect of all vehicles and portfolios managed by the Fund Manager, except those which, on an exceptional basis (as in the case of index funds), fall outside the scope of the Sustainability Risk Integration Policy, or those subsidiaries which, due to regulatory requirements, have their own policy in place.

Engagement Policy of CaixaBank AM [April 2024]⁷

As detailed in the following section.

CaixaBank's engagement policy in relation to discretionary portfolio management [May 2022]⁸

As detailed in the following section.

In addition to the aforementioned policies, CaixaBank has a broad set of rules of conduct and principles of action there to instil an ethical and transparent culture among all members of the organisation, all of which can be found on the corporate website.

It also has various public positions on environmental and social strategy, including its Declaration on Climate Change [February 2024], Declaration on Nature [February 2024] and Human Rights Principles [February 2024], all of which, together with the policies outlined above, guide its strategic lines of action.

3.3 Criteria for the selection of additional indicators

In order to select the additional PAI indicators to be reported on, an analysis was carried out prioritising the following factors (i) The availability and coverage of the indicator by the data provider; and (ii) the alignment of the indicator with the Group's policies, as set out in section 3.2 of this statement.

As a result of this analysis, the additional PAI indicators listed in point 2 above have been selected and are set out below:

⁵ [Principios-Gestion-Riesgos-ASG.pdf](#)

⁶ [Politica de integracion de riesgos de sostenibilidad CAS.pdf](#)

⁷ [Politica de implicacion CAS.pdf](#)

⁸ [CABK Politica implicacion.pdf](#)

- Table 2, indicator 4: Investments in companies without carbon reduction initiatives.
- Table 3, indicator 14: Number of detected cases of serious human rights problems and incidents.

4. Engagement Policy

4.1 Engagement Policy of CaixaBank AM [April 2024]

The Engagement Policy applies broadly to all vehicles and portfolios managed by CaixaBank AM, except those for which the owners have decided to retain voting rights and carry out engagement activities themselves, or those subsidiaries which, due to regulatory requirements, have their own engagement policy.

The main objectives of this Policy are as follows:

- Maximise the creation of shared value for stakeholders and foster long-term relationships based on trust and transparency.
- Identify, prevent, and mitigate the principal adverse impacts of investment decisions on sustainability factors.
- Maximise the profitability and ensure the responsible management of CaixaBank AM's business, seeking a balance between financial and non-financial performance.
- Extend responsible principles and practices to advance together towards progress in social and environmental matters.

The Engagement Policy applies broadly to all PAIs. The PAI indicators considered in the policies are as indicated in section 3 of this document. The way the engagement policy is adapted when there is no reduction in the PAI is explained in the section on dialogue actions.

CaixaBank AM diligently engages in dialogue and exercises attendance and voting rights, always for the exclusive benefit and interest of investors and shareholders:

Dialogue actions:

CaixaBank AM may engage in dialogue either directly with the providers of investment products and issuers, or collaboratively with other investors, or through a third party acting on its behalf. In this regard, collaborative actions with other investors will be prioritised, as these are considered to be more effective in changing habits and behaviours among issuers. If dialogue with the issuer is chosen, this will be done, as far as possible, while always preserving the independence of the Fund Manager and the interests it represents.

In the case of third-party products such as investment funds, and in addition to dialogue processes, due diligence processes will be carried out on a regular basis to assess ESG integration procedures at fund manager level and in terms of the investments it makes. Among the various aspects analysed, special attention will be paid to mechanisms relating to engagement, dialogue and voting.

If, as a result of dialogue with a company, a favourable outcome has not been achieved, voting may be used as a strategy to continue dialogue with the company based on the achievements made. The steps taken may include supporting motions put forward at the behest of shareholders seeking greater transparency or better ESG performance, or voting against the election (or re-election) of a board member responsible for ESG issues if an adverse impact has occurred during their term.

The above applies to any PAI. In other words, the approach to reducing IPAs related to a specific entity consists of addressing the situation first through dialogue and/or voting. The

description regarding the Engagement Plan explains in greater detail why CaixaBank AM considers these actions to be the most effective in reducing PAIs. If these engagement actions fail to achieve the desired outcomes, we move on to consider the escalation strategy, as described and set out in our policies and procedures.

These policies are continuously reviewed, monitored and adapted to ensure their alignment with regulatory requirements and developments in sustainability. They may also be adapted down the line in response to the trend in, and performance of, the PIA indicators.

Exercise of voting rights:

CaixaBank AM shall exercise the voting rights attaching to the listed securities comprising the portfolios it manages, always in the exclusive interest of the investors. It will exercise its voting rights in line with its socially responsible investment approach and looking at social responsibility, sustainable development and good governance matters, all of which are essential when appraising a company.

Thus, by exercising its voting rights, CaixaBank AM aims to influence corporate policies to improve the deficiencies identified in relation to ESG concerns.

CaixaBank AM exercises its voting rights after assessing the medium- and long-term performance of the companies in which it invests, considering environmental, social and governance issues in line with its adherence to the Principles for Responsible Investment (PRI).

The rights to attend general meetings and vote on listed securities are exercised directly or by proxy granted to a fellow shareholder, in which case the vote must be cast in accordance with the instructions given in the proxy, as previously decided by CaixaBank AM.

The Engagement Policy takes into account CaixaBank AM's adherence to the Code of good practices for institutional investors, asset managers and proxy advisors in relation to their duties in respect of assets entrusted to or services provided by them, as approved by the Spanish National Securities Market Commission on 22 February 2023 (the "Code of Best Practice for Investors").

Engagement Plan 2025–27

The Engagement Plan is aligned with the provisions of CaixaBank AM's engagement policy. It aims to prioritise the most relevant actions for voting and dialogue, i.e. those capable of achieving the greatest impact on issuers' behaviour and enabling the most efficient use of available resources.

The priorities have been determined with regard to:

- the CaixaBank Group's ambitions with regard to sustainability;
- the sustainability commitments made by CaixaBank AM, including the Principles for Responsible Investment (PRI), the TCFD recommendations integrated into the relevant ISBB and/or IFRS standards, or other industry initiatives;
- the global context and practices in sustainability;
- the principal adverse impacts (PAIs) of investments;
- the portfolio profile (its sector and geographical exposure, ESG characteristics, etc.); and
- the resources available at CaixaBank AM, the relevant positions, and/or the social and/or environmental impact.

4.2 Engagement Policy in relation to discretionary portfolio management [May 2022]

The Engagement Policy is applicable to the provision of discretionary portfolio management services, which it has delegated to CaixaBank AM. This Policy sets the principles followed to participate in the decisions of the companies and issuers it invests in, considering environmental, social and governance criteria.

This policy has the following goals:

- To encourage the engagement of intermediaries and asset managers in the governance of investee companies.
- Improve the transparency of investment strategies, engagement policies and the process for exercising voting rights, especially when voting advisors are used.

The Engagement Policy sets out the dialogue actions to be carried out through CaixaBank AM. When it comes to exercising voting rights, clients of the discretionary portfolio management service do not typically delegate to CaixaBank the vote or exercise of the voting rights inherent in the shares they hold. Accordingly, CaixaBank will not exercise the voting or political rights arising from the shares held by its customers under the discretionary mandates managed, insofar as customers retain the exercise of voting rights under the provisions of the discretionary portfolio management contract.

For those contracts where discretionary portfolio management is primarily carried out with funds managed by CaixaBank AM, clients adhere to the voting policy of this institution.

5. References to international standards

Through the Group's commitment to various international guidelines, it establishes business conduct criteria in adherence to the primary standards recognized internationally for due diligence. These standards encompass the Group's responsibilities and the applicable regulations for conducting its activities in particular sectors, aimed at mitigating the risk of events that might lead to sustainability-related adverse incidents.

Both CaixaBank and CaixaBank AM consider various international standards as part of their control framework to prevent events that could result in adverse impacts on sustainability and are committed to several initiatives in this domain that strengthen their management of ESG risks and factors.

The alignment between the PAI (Principal Adverse Impact) indicators and international standards is determined by the thematic areas they have in common. For instance, if CaixaBank AM (to the extent that it is responsible for the discretionary management of its client portfolios) has adopted environmental standards and commitments, the monitoring and management of the environment-related PAI indicators will be influenced, more or less, by these standards and commitments.

See the table in section 2 for specific references to the methods and data used, as applicable, to measure adherence to or achievement of the Paris Agreement goals, including the scope of coverage, sources of data, or the way in which the employed methods anticipate the PAIs.

Concerning its commitments and initiatives, CaixaBank AM undertakes the following actions on a regular basis to monitor adherence to policies and commitments:

- Periodic review of policies/memberships by governing bodies.

- Oversight of compliance by the relevant authorities, and, if necessary, the establishment of control measures, objectives, and action plans, as well as the reporting of progress.

5.1 International standards related to environmental issues

The subjects and commitments outlined in these statements are associated with some of the PAI indicators relevant to environmental matters (indicators 1, 2, 3, 4, 5, 6, and 15 in Table 1; as well as indicator 4 in Table 2 of Annex I of the RTS):

- CaixaBank AM (and CaixaBank) follows the TCFD recommendations integrated into the relevant ISSB and/or IFRS standards.
- Adherence to the Transition Pathway Initiative (TPI)
- Adherence to the Swing initiative on nature.
- Global Investor Statement to Governments on the Climate Crisis.

5.2 International standards related to social issues

The subjects and commitments outlined in these declarations are associated with some of the PAI indicators relevant to social and labour issues (indicators 10, 11, 12, 13, 14, and 16 in Table 1; as well as indicator 14 in Table 2 of Annex I of the RTS).

CaixaBank AM is committed to respecting the following instruments:

- The International Bill of Human Rights of the United Nations
- The International Labor Organization Declaration on Fundamental Principles and Rights at Work and the eight fundamental conventions identified by the same.
- The EU Charter of Fundamental Rights
- The Guiding Principles on Business and Human Rights of the United Nations.
- The OECD Guidelines for Multinational Enterprises;

Furthermore, CaixaBank AM is committed to the Advance initiative, which is promoted by the Principles for Responsible Investment (PRI) and aims to enhance the implementation of the United Nations Guiding Principles on Business and Human Rights through the collective influence of institutional investors.

5.3 Adherence to other sustainability initiatives

The subjects and commitments contained in these declarations relate to all the PAI indicators:

- Adhesion to the UN Global Compact.
- Adhesion to the UN Principles for Responsible Investment (PRI).

5.4 Use of a climate scenario

No forward-looking climate scenarios have been used in the management of the PAI indicators in the current year. Although the currently available ones have been assessed, the results they

provide are considered unreliable and of insufficient quality for the time being, as they are still under development.

6. Historical comparison

The results of the PAI indicators provided for the 2023 financial year data are disclosed solely for comparative purposes and correspond to those contained in the “Statement of

Principal Adverse Impacts of Investment Decisions on Sustainability Factors”⁹ referring to the 2023 financial year.

This statement also includes data for 2022 for information purposes only, as shown in the ‘Statement of Principal Adverse Impacts of Investment Decisions on Sustainability Factors’ for that financial year.

Please note that the results of some PAI indicators for 2024 are not comparable with those of the previous year for the following reasons:

- The calculation method for the indicator renders the data non-representative and non-comparable (PAI 4).
- Limited coverage and/or the quality of data provided by data providers (PAIs 5 – Production, 6, 8, 9 and 12).
- Change of methodology by the data provider (PAIs 7, 11 and 4 – additional climate indicator).
- Lastly, changes in the scope and the reporting boundary for measuring the indicators for PAI 16, because in the prior year, reporting only covered positions related to direct investments as of the end of 2023.

⁹ You can find the previous Statement at the following link: [Declaracion-Principales-Incidencias-Adversas-CaixaBank-Participante-2023-ES.pdf](#)




