BUSINESS CONTINUITY POLICY

Table of Contents

1	COMMITMENT AND OBJECTIVES	. 2
2	SCOPE	. 2
	•	
3	PRINCIPLES	. 7



BUSINESS CONTINUITY POLICY

1 | COMMITMENT AND OBJECTIVES

- BPI has implemented the Business Continuity Management function, aligned with the best practices and recommendations of the financial system's supervisory authorities. This function is ensured by a Business Continuity Management System based on the international standard ISO 22301. It consists of policies, resources, processes, and procedures to ensure the continuous operation of the business, or its timely recovery, should any event that may disrupt its normal course occur, whether of natural, human, or technological origin.
- BPI maintains, monitors, and continuously improves its Business Continuity Management System in accordance with international standards.
- BPI thus demonstrates its commitment to the management of business continuity based on the best practices, while also meeting the following objectives:
 - Protecting the people and assets of the Bank.
 - Preserving the availability of products or services required by Customers and the financial system in general.
 - Protecting the public image and confidence in the Bank.
 - Ensuring compliance with the Bank's legal, regulatory, and contractual obligations, in accordance with the expectations of its Customers, Shareholders, Employees, Supervisors and Public Bodies.
 - Balancing the Group's activity and risk, minimising financial losses and guaranteeing competitive conditions in the market.

TABLE OF CONTENTS

2 | SCOPE

The Business Continuity Policy applies to all Group entities 100% owned by BPI.

TABLE OF CONTENTS

3 | PRINCIPLES

- The Business Continuity strategy will comply with the following guiding principles:
 - Alignment with business objectives: The risk management approach will always remain aligned with BPI's strategic objectives, maintaining the value provided by products and services, contributing to the achievement of the Bank's business objectives, and maintaining risk levels in accordance with the defined risk appetite.
 - Integration of risk management into BPI's decision-making: Risk management should be viewed as a necessary, fundamental, and explicit practice for decision-making, which should be an integral part of the Bank's activities and processes. This will ensure an adequate risk



BUSINESS CONTINUITY POLICY

assessment of the different existing alternatives in view of the difficulties or uncertainty that the provision of services may entail.

- **Professionalism and excellence:** The teams responsible for managing and controlling the risk associated with Business Continuity will be duly sized, trained and qualified for the performance of their functions, in line with the best market practices and subject to a process of continuous updating and training.
- Existence of Business Continuity risk management mechanisms: The integrity of the
 mechanisms for prevention, detection and response to incidents that may compromise the
 availability of products and services will be ensured. These procedures will cover detection
 mechanisms, classification criteria, review and resolution procedures, as well as communication
 to stakeholders.
- Adequate separation of functions: Proper separation of functions and division of critical functions will be ensured.
- **Homogeneity and structuring of risk management:** Risk management will be carried out using unified, systematic, and structured criteria and methodologies that allow it to operate dynamically and iteratively, quickly adapting to regulatory changes or emerging risks.
- **Proportionality:** The management of Business Continuity risks will be proportional to the nature, scope and complexity of the services.
- **Criticality:** The analysis of the Business Continuity risk will be carried out in accordance with the principle of criticality, prioritising the classification of the processes and assets that are most relevant to the Bank.
- **Transparency and Inclusion:** Risk management will be based on communication and discussion of risks on a recurrent basis with all stakeholders.
- **Continuous improvement:** The management of Business Continuity risks will follow a model of continuous improvement.
- **Regulatory compliance:** Compliance with the legislation in force concerning the Business Continuity management must be always ensured.
- Coordination and cooperation between departments and companies of the Group:
 Adequate coordination and exchange of information between the different divisions of BPI and
 CaixaBank Group companies must be ensured.

The revised Business Continuity Policy was approved by the Board of Directors on June 30, 2021, and updated on March 29, 2022.

TABLE OF CONTENTS

