

## Instructions to apply for adopting 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 ("Stewardship Code")

Investors, managers and proxy advisors who wish to adopt the Code must submit two documents to the CNMV with the following content:

1. A document, which will be made public on the CNMV website, with the following information:

- Full corporate name of the entity adopting the Code.
- Legal Entity Identifier (LEI), if the entity has one. If the LEI is not available, then the tax number (NIF) of the entity.
- Corporate body that approved the adoption of the Code.
- Date on which that corporate body approved the adoption.
- If the entity has decided to avail itself of the transitional period.
- Entities carrying out different business activities must state whether the Code is adopted in the capacity as investor, as manager, or as both, or, in the case of insurance entities, whether the Code is adopted only as regards the life insurance activity, or also non-life or general insurance.
- Specific address of the entity's website which explains, in a visible and clear manner, its engagement and voting policies, and information on the integration of sustainability risks in its investment strategy and operations, as well as its annual reports on how it has applied these policies, together with the principles of this Code over the past year, including the main incidents and actions taken and the main objectives achieved. Links to the home page of the entity's website will not be valid.

Entities availing themselves of the transitional period must attach as an annex to this letter a plan and a provisional timetable showing which principles the entity would already comply with and the deadline by which the principles not yet complied with at the time of application are to be complied with for the first time. As Principle 6, which relates to the management of conflicts of interest, must be complied with from the date of adoption, when reporting compliance with this principle, a specific link to the entity's website where this conflicts of interest policy is accessible should be provided in the interests of greater transparency.

This plan and timetable should also be available on the entity's website and, of course, updated on the entity's website depending on the changes that may affect the initially envisaged plan reported in the annual report.

2. A document, which will **not** be made public, where the identity of the person or persons of contact of the entity for matters related to its adoption and monitoring of the Code is provided. The identity will include first and last name, title, mailing address, contact phone and email address.

Both documents must be sent through the Electronic Office of the CNMV, procedure [ZZZ – Sending a fee-format document](#), for those entities that access through the Cifradoc Area of the Electronic Office, or procedure [Any document, request or communication addressed to the CNMV](#), for entities that access through the Open Area of the Electronic Office, and, in either case, addressed to the Financial and Corporate Reports Department.

Once both documents have been received and it has been verified that both contain all the above information, the applicant entity will be added to the list of affiliated entities, which will be available on the CNMV's website.