

## **Remuneration policy of Gesalcalá, SGIIC, S.A.**

Gesalcalá, SGIIC, S.A. (hereinafter “the Management Company”) is a collective investment scheme (CIS) management firm that is registered with the CNMV under number 137 and which, together with Banco Alcalá, S.A. and Alcalá de Pensiones, SGFP, S.A., forms the Banco Alcalá Group.

Law 35/2003 of 4 November relating to Collective Investment Schemes and its implementing regulation, approved by Royal Decree 1082/2012 of 13 July, provide that management companies are required to draw up and implement a remuneration policy for those categories of employees whose duties have an impact on their risk profile (“identified employees”) based on certain principles. In parallel, other statutory texts impose equivalent requirements on several entities in the Banco Alcalá Group. Therefore, Gesalcalá has decided to adopt a group-wide remuneration policy in conjunction with such entities.

The general principles that govern the remuneration policy of the Banco Alcalá Group are set out below:

- **Cautious and efficient management of risk:** The policy will be consistent with adequate and efficient management of risk. It will promote this management approach and will not offer any incentives to take risks that exceed the level of risk tolerated by the institution.
- **Alignment with the Group’s strategy:** The policy will be consistent with the business policy, objectives, values and long-term interests of both the Group and the collective investment schemes managed by it.
- **Adequate proportion between fixed and variable pay:** As a general rule, variable remuneration relative to fixed remuneration will not account for a significant proportion. The fixed portion of remuneration should be sufficiently high for the variable portion to be flexible or even reach zero.
- **Multiple items:** The remuneration package will be made up of a variety of instruments in terms of content (cash and non-cash remuneration), time frame (short, medium and long term), security (fixed and variable) and objectives that will allow for adjustments to be made to remuneration in line with the requirements of the Institution and its employees.
- **Internal and external fairness:** The policy will reward the level of responsibility and professional track record of employees with a focus on internal fairness and external competitiveness.
- **Supervision and efficiency:** The remuneration package of the senior executives and employees of the management company whose performance has a material impact on the risk profile of the CIS (hereinafter “the identified category of employees”) will be approved and supervised each year by the Board of Directors of the Banco Alcalá Group through its Nomination and Remuneration Committee.



- Flexibility and transparency: The management rules relating to the remuneration of this category of employees will include mechanisms for dealing with exceptional situations based on the needs that may arise from time to time. Remuneration management rules will be specified explicitly and notified to all advisors and professionals in the Institution, with priority being given to transparency in remuneration matters.

Description of the variable components of remuneration:

On an annual basis, a variable remuneration amount (in cash) will be approved for every member of the identified category of employees. This is the amount that will be paid to the employee if the relevant objectives are attained.

For those employees who carry out CIS management functions within the identified category, variable remuneration will be tied to a series of financial and non-financial objectives that link remuneration to the company's performance in the medium and long term, with a view to preventing employees from taking excessive risk.

For those employees who carry out control functions relating to the Management Company's activity within the identified category, variable remuneration will be tied to the fulfilment of an objective linked to the employee's control duties, which in any event is independent from the areas supervised by such department.