

POLICIES FOR MANAGING CONFLICTS OF INTEREST OF THE DIRECTORS OF THE BME GROUP TRADING VENUES

1. EXTRACT FROM SECTION 7 OF THE POLICIES ON SELECTION, APPOINTMENT AND CONFLICT OF INTEREST:

“7. Conflict of interest management policy

7.1 Identification and obligation to disclose conflicts of interest

7.2 Measures adopted in the event of a conflict of interest

7.3 Special situations: prior notification

7.4 Related-party transactions

7.5 Non-compliance with the conflict of interest policy”

2. LISTS OF ACTUAL AND POTENTIAL CONFLICTS OF INTEREST OF THE DIRECTORS OF THE BME’S TRADING VENUES:

The selection, appointment and conflict of interest policies of the BME Group’s trading venues, which include situations of actual and potential conflicts of interest, were approved by their respective Boards of Directors on the following dates:

- Sociedad Rectora de la Bolsa de Valores de Madrid, S.A.U. (Madrid Stock Exchange) on 17.07.2024
- Sociedad Rectora de la Bolsa de Valores de Barcelona, S.A.U. (Barcelona Stock Exchange) on 22.07.2024
- Sociedad Rectora de la Bolsa de Valores de Bilbao, S.A.U. (Bilbao Stock Exchange) on 19.07.2024
- Sociedad Rectora de la Bolsa de Valores de Valencia, S.A.U. (Valencia Stock Exchange) on 23.07.2024
- Sociedad de Bolsas, S.A. on 17.07.2024
- Bolsas y Mercados Españoles Renta Fija, S.A.U. (BME Fixed Income) on 17.07.2024
- MEFF, Sociedad Rectora del Mercado de Productos Derivados, S.A.U. (MEFF) on 17.04.2024
- Bolsas y Mercados Españoles, Sistemas de Negociación, S.A. (BME SN) on 23.07.2024

SECTION 7 OF THE SELECTION, APPOINTMENT AND CONFLICT OF INTEREST POLICIES

“7. Conflict of interest management policy

Directors shall, as far as possible, avoid any activity that could give rise to a conflict of interest in the exercise of their duties on the governance bodies.

7.1 Identification and obligation to disclose conflicts of interest

Directors must notify the Nomination Committee, through its Secretary, of any change in their personal situation that may give rise to a conflict of interest, as well as any situation that has given rise to a conflict of interest.

In order to facilitate the identification of situations that may give rise to a conflict of interest, the Company maintains an illustrative and non-exhaustive list of circumstances that could give rise to a conflict of interest, which is included in this document as Appendix II.

7.2 Measures to be adopted in the event of a conflict of interest

When, in the performance of his/her duties, he/she have to take a decision in which there is or may be a conflict of interest, or in which his/her objectivity or ability to perform his/her duties may be compromised, the Director affected shall:

- communicate this circumstance to the Chair of the Board of Directors or, if applicable, of the Nomination Committee; and,*
- abstain from participating in the analysis, study, discussion, and voting on the issue to which the conflict relates.*

In such cases, the Chair of the Board of Directors may request the Director to be absent from the meeting at the time the matter is discussed.

Notwithstanding the foregoing, Directors may participate in the deliberation and approval of any rules, instructions or decisions of general application.

The Comisión Nacional del Mercado de Valores (National Securities Market Commission) shall be notified, where appropriate, of any conflicts of interest that may have arisen and the measures adopted in this respect.

7.3 Special situations: prior notification

Prior to acceptance, Directors must notify the Nomination Committee of any proposed appointment as Director of:

- a company listed on the regulated market/multilateral trading facility for which the Company is the governing body;*
- a entity that is member of the regulated market/multilateral trading facility for which the Company is the governing body;*
- a company that is a significant service provider of the regulated market/multilateral trading facility for which the Company is the governing body.*

This does not include proposed appointments as Director of BME Group and SIX Group companies.

7.4 Related-party transactions

In accordance with the provisions of the Ley de Sociedades de Capital (Spanish Corporate Enterprises Act), Directors must refrain from entering into transactions with the Company, except in the case of ordinary transactions, made on standard terms for customers and of little relevance.

The exemption regime will apply to these transactions under the conditions established in the aforementioned Ley de Sociedades de Capital (Spanish Corporate Enterprises Act).

Given the activities carried out by the Company, transactions, operations or actions that the Directors may carry out in the course of their activities on the regulated market/multilateral trading facility governed by the Company shall not require prior authorisation, nor shall they be subject to disclosure requirements, provided that such transactions, operations or actions are within the ordinary course of business of the parties involved and are carried out under normal or recurring market conditions.

7.5 Non-compliance with the conflict of interest policy

Infringement of the provisions of the policy on conflicts of interest set out in this paragraph may be subject to the sanctions and penalties provided for in the applicable employment or professional rules.”

"ANNEX II

LISTS OF ACTUAL AND POTENTIAL CONFLICTS OF INTEREST OF DIRECTORS OF BME'S TRADING VENUES:

MADRID STOCK EXCHANGE (Board of Directors 17.07.2024)
BARCELONA STOCK EXCHANGE (Board of Directors 22.07.2024)
BILBAO STOCK EXCHANGE (Board of Directors 19.07.2024)
VALENCIA STOCK EXCHANGE (Board of Directors 23.07.2024)

- Direct or indirect relationship of the Director with a company whose securities are listed on the regulated market/multilateral trading facility of which the Company is the governing body.
- Direct or indirect relationship of the Director with a company that is a Member of the regulated market/multilateral trading facility of which the Company is the governing body or with companies of its group.
- Direct or indirect relationship of the Director with a service provider of the Company.
- The performance by a Director of activities other than those described above in entities or companies operating in the securities markets.
- Direct or indirect relationship of the Director with another BME Group and/or SIX Group company.

SOCIEDAD DE BOLSAS (Board of Directors 17.07.2024)

- Direct or indirect relationship of the Director with a company whose transferable securities are admitted to trading on the Spanish Stock Exchange Interconnection System of which the Company is the manager.
- Direct or indirect relationship of the Director with a company that is a Member of the Stock Exchange Interconnection System of which the Company is a manager or with companies of its group.
- Direct or indirect relationship of the Director with a service provider of the Company.
- The performance by a Director of activities other than those described above in entities or companies operating in the securities markets.
- Direct or indirect relationship of the Director with another BME Group and/or SIX Group company.

BME RENTA FIJA (Board of Directors 17.07.2024)

- Direct or indirect relationship of Director with a company whose securities are listed on the regulated market and the multilateral trading facilities of which the Company is the governing body.

- Direct or indirect relationship of the Director with a company that is a Member of the regulated market and of the multilateral trading facilities of which the Company is the governing body or with companies of its group.
- Direct or indirect relationship of the Director with a service provider of the Company.
- The performance by a Director of activities other than those described above in entities or companies operating in the securities markets.
- Direct or indirect relationship of the Director with another BME Group and/or SIX Group company.
- Direct or indirect relationship of the Director with the entities registered as Registered Advisors in the multilateral trading facility of which the Company is the governing body.

MEFF (Board of Directors 17.07.2024)

- Direct or indirect relationship of the Director with a company whose securities are listed on the regulated market/multilateral trading facility of which the Company is the governing body.
- Direct or indirect relationship of the Director with a company that is a Member of the regulated market/multilateral trading facility of which the Company is the governing body or with companies of its group.
- Direct or indirect relationship of the Director with a service provider of the Company.
- The performance by a Director of activities other than those described above in entities or companies operating in the securities markets.
- Direct or indirect relationship of the Director with another BME Group and/or SIX Group company.

BME SISTEMAS DE NEGOCIACIÓN (Board of Directors 23.07.2024)

- Direct or indirect relationship of the Director with a company whose securities are listed on the multilateral trading facilities of which the Company is the governing body.
- Direct or indirect relationship of the Director with a company that is a Member of the multilateral trading facilities of which the Company is the governing body or with companies of its group.
- Direct or indirect relationship of the Director with a service provider of the Company.
- The performance by a Director of activities other than those described above in entities or companies operating in the securities markets.
- Direct or indirect relationship of the Director with another BME Group and/or SIX Group company.
- Direct or indirect relationship of the Director with the entities registered as Registered Advisors in the multilateral trading facility of which the Company is the governing body.