



## LEGAL COMPLIANCE PROGRAMME

Proposed Board agreement to approve the establishment of a Legal Compliance Programme and the measures to be taken:

1. Designate Mr. Rafael Jiménez de Parga as Compliance Officer.
2. Approve the Legal Compliance Programme with the following measures:
  - a. Identify risk activities
  - b. Assess the penal and legal risks
  - c. Draft a risks map
  - d. Evaluate the probability of occurrence and importance of impact in order to prioritise risks
  - e. Evaluate controls currently in place
  - f. Draw up an action plan, the controls to be implemented, those responsible, and terms
  - g. Document the Legal Compliance Programme
    - i. Revision of the current Ethical and Good Governance Code
    - ii. Draft the Code of Conduct
    - iii. Legal Compliance Programme methodology (establish the protocols for adopting decisions, communication system, awareness raising, reporting, response in the face of non-compliance....)
    - iv. Definition of specific policies (appointment to posts and promotion, staff selection, use of CITs...)
  - h. Annual self evaluation or external auditing (the regular appraisal of such stipulations and, if needs be, their modification should significant infractions be detected or there be important changes in the organisation, control structure, or the Foundation's activity).

Barcelona, 25 April 2016