



REPORT ON COMPLIANCE WITH THE CODE OF CONDUCT FOR TEMPORARY INVESTMENTS

In their meetings of 20 October 2019, the governing bodies of the Association approved the Code of Conduct for Temporary Investments in order to comply and adapt the 20 February 2019 Agreement of the Board of the Spanish Stock Market Commission that approved the Code of Conduct for Temporary Investments in financial markets by non-profit organizations.

According to the Code of Conduct, the Board of Directors prepared this annual report on the degree of compliance with the principles and recommendations contained in the Code of Conduct and the regulations in force. The Report was submitted and approved, together with the Annual Accounts, by the 31 March 2022 General Assembly. The Report will be made available to Members and the general public, and will be published on the Association's website.

Evolution of the portfolio during 2021

In order to reassess its investment strategy, Club de Madrid liquidated its portfolio in June 2021, once its value had reached the level needed to recover the initial investment. During the period up to the disinvestment, the portfolio experienced a positive evolution that allowed us to completely offset the losses accrued, especially during 2020. During this period, the requirements regarding volatility were fulfilled, given that the composition of the portfolio was the same as at the end of 2020. As informed in the 2020 report, the volatility at the end of that year was 3.42%, within the limit required by the Code of Conduct, that establishes that “The investments shall have at any given time a maximum synthetic risk and reward indicator (SRRI) of 3 on a scale to 7 for the whole portfolio”. A SRRI of 3 corresponds to a volatility of 2% to 5%. The requirement of maintaining a “maximum SRRI of 4 for each of the investment funds that constituted the portfolio” was also fulfilled. The SRRI for the different funds were the following:

	ISIN	SRRI
HEND GRTM UK ABS RET R EU	LU0490786174	4/7
CAIXABANK CRECIMIENTO, FI CLASE Plus	ES0164540033	4/7
PICTET MULTI ASSET GLB	LU0941349192	3/7
INVESTEC GLOBAL MULTI A	LU1570387610	4/7
ROBECO SAM EURO SDG	LU0503372608	4/7
CAIXABANK ESTRATEGIA FLEXIBLE	ES0137656007	4/7
JUPITER GLB CONV "L" (EUR)	LU0522255313	4/7
ROBECO ALL STRATEGY EURO BONDS	LU0085135894	3/7



Composition of the portfolio as of December 31, 2021

There is no investment in investment funds or other financial assets as of December 31, 2021.

Conclusions

At the end of 2021 the organisation had started discussions with Caixabank regarding its excess liquidity, then deposited in bank accounts, and the possibility of moving it into portfolios managed directly by the bank complemented with other financial assets of low volatility.