

GC Journeys: Francisca Comiche of Rabobank Group

Career Development



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Francisca Comiche

General Counsel

Rabobank Group

Rooted in integrity

When Francisca Comiche stepped into her role as general counsel at Rabobank in 2020, she made herself one promise: “If the positioning of legal is going to be less because of me, I will leave.” That never happened. In fact, she did the opposite, elevating the role, strengthening its independence, and earning the trust of both her legal department and the board.

Her leadership journey is one of quiet strength, resilience, and clarity of purpose. Whether navigating internal investigations, repositioning legal under the CEO, or managing through COVID-era onboarding, Comiche has remained steady in her approach: **lead with courage, stay true to yourself, and never walk alone.** This conversation took place June 27, 2025, with moderator,

Alessia Sharma, ACC Europe country representative — United Kingdom.

View the full recording for more insights!

From DLL to Rabobank: Learning to lead all over again

Before joining Rabobank, Comiche built the legal function from the ground up at DLL (De Lage Landen), starting in a team of two and eventually leading a robust, respected legal department with global reach. But transitioning into Rabobank — a far larger and more hierarchical institution — brought a different challenge.

“People didn’t know me. My predecessor had been at Rabobank for 36 years. I think not everybody was happy with my appointment. I think there were some people that wanted to have my position, perhaps, as well. And I think in such an environment, the most important is still staying close to yourself,” she said.

“And at the same time, I had to create trust again. Right? I had to be trusted again so that I could position legal correctly, at least not less strong,” Comiche shared candidly. “I had to rebuild trust from scratch.”

Starting mid-pandemic, she met most of her team via screens. Only when the office reopened did she realize just how much work needed to be done — not just on legal structure, but on culture. So, she brought in a change manager, not to drive performance, but to rebuild trust and foster collaboration.

“If you're not trusted by your own department or you're not trusted by the managing board, you cannot succeed,” she said.

Positioning legal where it belongs

A pivotal moment came when the chief risk officer left. Comiche used the opportunity to push for legal to report directly to the CEO — an unusual move in some banks. But she saw it as necessary.

“This wasn’t about status,” she explained. “It was about independence. Legal isn’t a second-line monitoring function. We’re close to the business but also close to the regulatory world, to the governance, to everything, actually. We actually see everything in a company.”

The board agreed. Her argument was clear, grounded in values, and rooted in protecting the long-term interests of the bank. It was also a turning point in how legal was seen across the organization.

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Crisis, trust, and composure

Trust was tested again during Rabobank's recent criminal investigation into anti-money laundering (AML). Comiche found herself presenting to the board, managing regulatory touchpoints, and leading her team through difficult, high-stakes work.

She found herself asking whether the board truly trusted her. "If you, as a general counsel, don't feel that you are trusted, you can also not position legal. I cannot really represent legal if I'm not trusted," Comiche said. "So, to me, that was kind of the very important first thing to do is to actually get the trust of the managing board there."

Preparing for the future: AI, ESG, and beyond

Comiche is clear-eyed about the future: Legal functions are facing dramatic transformation. Between regulatory complexity and the rise of generative AI, in-house legal teams need to be more adaptable, proactive, and multidisciplinary than ever.

Under her leadership, Rabobank's legal department has created rotating "legal project" teams for hot topics like AML, ESG, privacy, and digitalization. These teams cut across traditional silos, enabling lawyers to build breadth and stay current. It's also preparing them for the next evolution: AI-assisted lawyering.

"We're training people in prompting, using Copilot, experimenting with ContractBot AI," she explained. "Not so much because of the tool itself, but I do believe that the way we think and work needs to change. So, I'd rather not wait until it comes to us. I'm trying to anticipate. And actually, we are training our lawyers on the new skills that they need."

She believes legal work will shift from technical analysis toward judgment, ethical navigation, and guiding companies through ambiguity — skills no machine can replicate. Build the knowledge and confidence to understand and apply AI in your legal department with **ACC's AI Center of Excellence for In-house Counsel**.

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Leading with authenticity

What makes Comiche stand out isn't just her legal acumen. It's her leadership philosophy.

She challenges her team to know their strengths, be honest about their blind spots, and ask themselves the hard question: Am I still the right person for this job?

"If you stop developing, or if the job requires something you don't have, don't adapt just for the sake of it. Either bring someone in who can help — or move on. That's leadership," she said.

Comiche also models that herself. Whether it was bringing in a change manager or carving out a dedicated role for AI transformation, she doesn't hesitate to delegate, collaborate, and share credit.

Work, family, and recharging



Despite the demands of her role, Comiche knows how to disconnect.

“When I’m with my kids, they are my priority. And I really can switch off. You can’t always be on,” she shared.

Reading, traveling, and seeing the impact of her work — especially reconnecting with old colleagues from DLL — keep her energized.

Words to lead by

Comiche’s advice for future legal leaders is simple, but powerful:

- “Know your strengths — and use them.”
- “Know your weaknesses — and surround yourself with people who complement them.”
- “Never try to imitate someone else’s style.”
- “Lead with courage, perseverance, curiosity, and passion.”
- “Don’t adapt to the job. Ask if you’re still the right person for the job.”

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