

Supplier Code of Conduct

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Corporate information:
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Supplier Code of Conduct

Introduction

CaixaBank, S.A. is a credit institution and parent of a financial and investment services group. Through this Supplier Code of Conduct (hereinafter, the "Code"), CaixaBank intends to spread and promote the ethical values and principles that will govern its suppliers' activity of goods and services, contractors and third-party collaborators (hereinafter, "suppliers").

The Supplier Code of Conduct is applicable to the suppliers of CaixaBank and the companies of its Group with which it shares the procurement management model.

Notwithstanding the above, to facilitate following the Code, only CaixaBank shall be mentioned.

As a general principle, CaixaBank shall only hire suppliers that operate in accordance with best practice in ethical, social and environmental issues, as well as good corporate governance. In turn, suppliers shall respect basic human and labour rights when undertaking their business and work to spread them across their value chain.

The principles contained here will conform to and be in keeping with the principle of proportionality, which is why, in applying them, the size, internal organisation, nature, scale and complexity of the activities carried out by the suppliers providing their services must be taken into account.

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Supplier Code of Conduct

Purpose and scope

1. CaixaBank considers its suppliers as indispensable to meet its growth objectives and improve the quality of service, seeking to build relationships with them based on trust and in keeping with its values.
2. Complying with the principles and action guidelines that are described in this Supplier Code of Conduct is crucial when selecting and assessing the suppliers.
3. It is essential for CaixaBank that the suppliers guide their activity based on the principles of integrity, accountability and diligence, following correct behaviour patterns on the market.

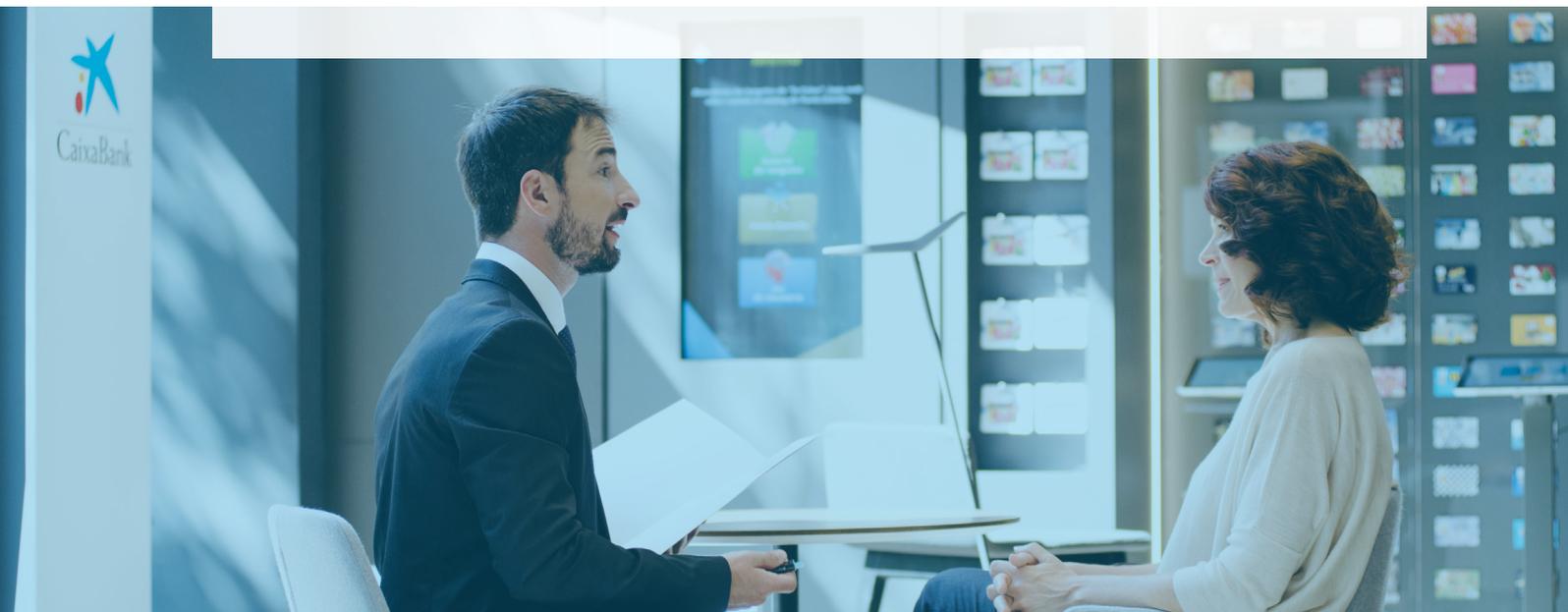
4. CaixaBank's activity requires the legality in force to be rigorously fulfilled. As a result, CaixaBank requires its suppliers to refrain from engaging in any conduct, expressly or tacitly, that, as a result of the standard or through illicit or criminal activity, may entail a reified profit in income, cost saving or any type of competitive edge.
5. Similarly, CaixaBank expects the suppliers to drive the principles within this document throughout the value chain.
6. CaixaBank will encourage communication so that suppliers know and understand this Code and can assume its compliance. Similarly, every supplier will be responsible for ensuring that its employees understand and comply with the Code.
7. Whatever is described in this document does not substitute specific requirements of the contracts, but rather complements them. If a contract term is stricter, the supplier must comply with the stipulated contract terms.

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Principles of Conduct

The Supplier Code of Conduct determines specific guidelines in the following content areas:

- **Human and labour rights.**
- **Ethics.**
- **Health and safety.**
- **Environment and quality.**
- **Confidentiality, privacy and continuity.**



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Supplier Code of Conduct

Human and Labor Rights

- ① CaixaBank requires its suppliers to show strict respect for human and labour rights and encourages them to include conduct aligned with its values in their practices and transmit them to their own value chains.
- ② Thus, the suppliers will comply with all applicable local and national laws and standards referring to labour practices, those regarding profits, the health and safety of their workers and anti-discriminatory practices in the countries in which they operate, produce or engage in their business activity and shall avoid any activity that does not conform to applicable labour standards. In addition, the suppliers:
 - Will recognise freedom of association, union freedom and the right to collective bargaining, in accordance with the prevailing legislation of the country in which they carry out their activity.
 - Will avoid discrimination in the workplace and in employment because of gender, gender identity, race, colour, nationality, creed, religion, political opinion, affiliation, age, sexual orientation, status, incapacity, disability and other situations protected by the law.
 - Will avoid colluding in any form of abuse of Human Rights and will defend eliminating forced and compulsory labour and the effective abolition of child labour. Will not hire minors under the legal minimum age to work, as per local or national legislation that is applicable to them and, in no case, an age lower than 14 years old (according to the C138, Agreement on the minimum age of the ILO).
 - Will comply with the work standard that may be applicable to them at all times.
 - Will impede any practice from being carried out that involves a threat, force or any type of intimidation, reprisals or abuse of power for the purposes of exploitation and forced labour of workers.
 - Will promote equal opportunities for employees of both sexes in accordance with the law and the agreements signed with the workers representatives. Will consequently ensure a work environment that is free from harassment, intimidation or improper or offensive conduct, including sexual propositions or suggestions, graphic material and other actions that may offend the dignity of any person.

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Ethics

1. CaixaBank will not tolerate any form of corruption, bribery or money laundering from criminal or illicit activities. CaixaBank will not accept activities that are not aligned with prevailing regulations under the premise that one is operating in favour of CaixaBank, regardless of the possible financial benefit or any other kind that may be created.
2. The suppliers will carry out their activity with integrity, transparency and the highest degree of business ethics.
3. CaixaBank has a Code of Ethics and Principles of Conduct¹ that highlights the values (quality, confidence and social commitment) and the ethical principles that inspire their activity and that must govern their activity. These principles are complying with laws and standards, integrity, transparency, excellence, professionalism, confidentiality and social responsibility. For that reason, it is important to CaixaBank that its suppliers are aligned with these values and principles.
4. CaixaBank is committed to the fight against corruption in all its forms, including extortion and bribery. CaixaBank has an anti-corruption policy² that is an essential tool to prevent both the entity and its employees from engaging in conducts that may be contrary to the regulatory provisions and CaixaBank's basic principles of conduct. Consequently, CaixaBank shall require its suppliers to adopt suitable measures to ensure fair conduct and competition on the market, thus avoiding conduct that is contrary to current legislation and the principles underlying its business.

1. https://www.caixabank.com/deployedfiles/caixabank/Estaticos/PDFs/responsabilidad_corporativa/Code_of_Business_Conduct_and_Ethics_jan2019.pdf

2. https://www.caixabank.com/deployedfiles/caixabank/Estaticos/PDFs/responsabilidad_corporativa/Anti_corruption_Policy_jan2019.pdf



5. The suppliers shall establish mechanisms to fight against all forms of corruption, extortion, price fixing and/or anti-competitive behaviour, embezzlement, falsification, bribery, money laundering, financing of terrorism or peddling of political favours.
6. The suppliers will not accept nor offer gifts, benefits, favours or provisions free of charge that are intended to improperly influence their business, professional or administrative relationships.
7. The suppliers will avoid entering into actual or potential situations of conflicts of interest, of their employees and of those of CaixaBank, and they will maintain mechanisms that, in the event of a potential conflict of interest, guarantee the independence of the supplier's activity. Any individual affected by the conflict of interest must refrain from becoming involved or participating in the related negotiation or transaction.
8. The suppliers shall ensure the image and reputation of CaixaBank is preserved in its professional activities.

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Health and Safety

1. The suppliers will undertake to respect the labour laws and regulations of the country where they provide the service, as well as commitments included in CaixaBank's Risk Prevention at Work Policy.
2. The suppliers will promote safe and healthy workplaces, carrying out the required activities to reduce the risk of accidents, injuries and exposure of their workers.
3. The suppliers will provide safety information regarding the known risks of the workplace, and employees of the supplier will receive the corresponding training to ensure that they are properly protected. The suppliers will detect and evaluate probable and potential emergency situations in the workplace and minimise their impact.

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The Environment

- ① Suppliers will guarantee compliance with the applicable environmental standard and will provide the services and tasks comprising the same in an environmentally conscious way in all the regions where they carry out their activity. Plus:
 - They will carry out their activity taking into account significant opportunities and risks that are derived from an environmental perspective.
 - They will work to minimise their direct detrimental impact in the environment.
 - When applicable, they will use environmentally conscious technologies.
- ② When the supplier's activity and the nature of the services rendered may have a significant impact on the environment, CaixaBank will be able to request to find out the applied preventive measures and the systems to identify, manage and minimise the negative environmental impact of their activities.
- ③ The suppliers will encourage the rational use of energy and efficiency when using basic resources by maintaining a preventive approach that reduces the environmental impact of its operations and safeguards natural resources.

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Confidentiality, Privacy and Continuity

- ① CaixaBank shall require that its suppliers keep confidential the information they can access as part of the contractual relationship they hold with CaixaBank.
- ② The suppliers must comply with the laws with regard to applicable data protection, privacy and information security in the countries in which they operate and with the clauses regulating the relationship between the supplier and CaixaBank.

3. The suppliers undertake to process the personal data exclusively by following CaixaBank's instructions, to guarantee that the people authorised to process the data have pledged to respect its confidentiality and to adopt the appropriate technical and organisational measures to ensure that the suppliers properly protect the personal information CaixaBank discloses to them.
4. When applicable, suppliers will have business continuity and technological contingency plans that guarantee the continuity of the services provided.
5. Suppliers will protect and respect all the intellectual property rights of CaixaBank.

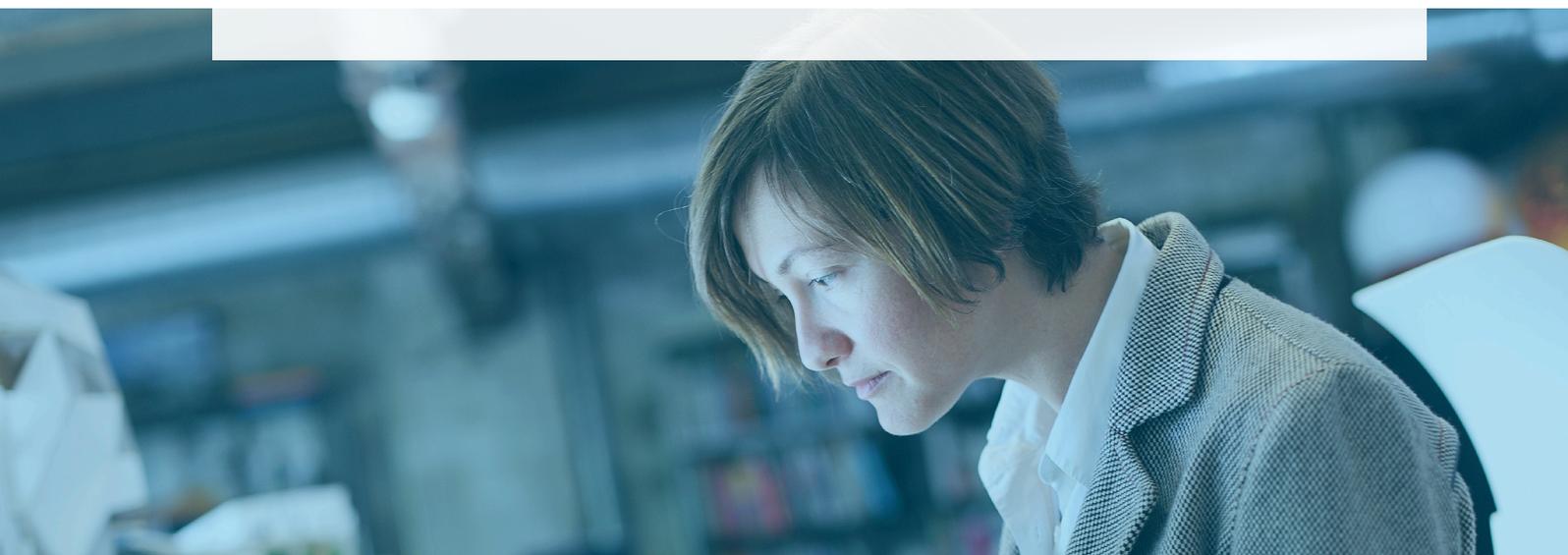
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Crime Prevention

CaixaBank has a Crime Prevention Model that aims to prevent and avoid crimes from being committed within the organisation, based on the provisions set forth in the Criminal Code related to a legal person's criminal liability. For this reason, CaixaBank has strengthened its model of organisation, prevention, management and control, which has been designed fully in accordance with the culture of compliance that underpins the decision-making at all levels in CaixaBank.

In this respect CaixaBank has approved a Corporate Criminal Compliance Policy, in which it is established that the general principles present in it must also be complied with by its suppliers. These principles include encouraging a corporate culture of prevention and not tolerating illicit or fraudulent acts being committed and the obligation of all people under its responsibility to report any event that potentially constitutes a crime, fraud or irregularity.



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Supplier Code of Conduct

Adherence and Compliance with the Code

1. This Code is mandatory for suppliers of CaixaBank. The suppliers formally undertake to comply with this Code as soon as they register on the CaixaBank Supplier Web Portal or when renewing their contracts.
2. Suppliers will establish suitable mechanisms to effectively promote this Code among its employees and, especially, anyone who carries out work for CaixaBank. In turn, suppliers must take responsibility that their own suppliers are subject to the principles of conduct equivalent to the provisions of this Supplier Code of Conduct. CaixaBank reserves the right to audit its suppliers or, where appropriate, request that they show that they have effectively complied with the provisions of this Code.
3. Non-compliance by the supplier of this Code can have consequences in the contractual relationship with CaixaBank. Depending on the severity of non-compliance, these consequences may range from a warning to the contract being terminated early, notwithstanding any other legal or administrative actions that may be applicable. This aspect will be included in the corresponding contract with the supplier.
4. Suppliers will carry out an internal follow-up of compliance with this Code and they will proactively communicate to CaixaBank any non-compliance of the same, paying particular attention to those aspects that may have a direct or indirect economic or legal impact or affect its reputation.
5. CaixaBank will offer its suppliers a service channel through which the supplier will be able to communicate any fact that may be contrary to the provisions of the current Code, including those cases constituting fraud and even criminal conduct. This channel will also be the method used to send any queries that may arise with regard to compliance with the Code.
6. Regulatory Compliance will be the department of CaixaBank responsible for receiving complaints and enquiries on the application of this Code and for handling them in relation to the interests and needs of CaixaBank. For this purpose, the required standards of integrity and confidentiality shall apply.