



CaixaBank action policy in anti-corruption matters



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INTRODUCTION

CaixaBank, S.A. has a Code of Ethics approved by its Board of Directors. The second section of the Code states that the bank's core values are: compliance with the law and the effective regulations at all times, respect, integrity, transparency, excellence, professionalism, confidentiality and social responsibility.

As a signatory of the United Nations Global Compact, CaixaBank agrees to comply with 10 principles established therein, and in particular, to work against corruption in all its forms, including extortion and bribery (Principle No.10).

As another manifestation of adherence to these principles, the Board of Directors hereby approves this Policy, which must be considered an essential tool in ensuring that the Entity and all other persons included in the application scope of this Policy are not engaged in the conduct that can be contrary not only to the regulatory provisions, but also, as the case may be, to the aforementioned basic principles of action. For such reason, this Policy governs the actions and indicates the prohibited actions carried out directly or indirectly by means of a related party.



1. SCOPE OF APPLICATION

This Policy is applicable to CaixaBank and all its employees, directors and members of the administrative bodies. All such persons must become aware and comply with the Policy.

CaixaBank encourages dependent companies and providers to adhere to the codes of conduct and values that are similar to those set forth in this Policy. When stated expressly, selection of providers may be contingent on the commitment to comply with the provisions of this Policy.

DEFINITIONS

Corruption between private individuals: the act by means of which a private individual, acting personally or through an intermediary, promises, offers or grants directors, employees or collaborators of a trading company or any other firm, partnership, foundation or organization an unfair benefit or advantage of any nature, in order for the to favor him or a third party against others, breaching their obligations in acquisition or sale of goods or in hiring of professional services.

Corruption of a public officer (bribery): an act by means of which a private individual offers or delivers a handout or remuneration of any kind to an authority, civil servant or person who participates in the exercise of public duties in order for the latter to perpetrate an act that is against the duties inherent to his office, or an act inherent to his office, or in order for him not to carry out, or to delay what he should carry out.

Corruption in international commercial transactions: offering, promising or granting any undue pecuniary or other kind of benefit, corrupt or attempt to corrupt foreign civil servants or international organizations, personally or through an intermediary, for their own benefit or that of a third party, or who attend to requests in that regard, in order for them to act or abstain from acting in relation to exercise of public functions to obtain or conserve a contract, or another irregular benefit in carrying out international economic activities

Extortion: whoever, for the purposes of profit-seeking, compels another person by means of force or intimidation to perform, tolerate or omit some action or legal business, to the detriment of its assets or those of a third party.

Pressure group or lobby: a group of influential people, organized for the purposes of pressing in favor of certain interests.

The United Nations Global Compact: it is a voluntary corporate citizenship initiative that asks companies to embrace, support and enact a set of core values in the areas of Human Rights, Labor, Environment and Anti-corruption which is conveyed by means of 10 principles.

Sponsorship: economic or any other type of aid, generally provided for publicity or tax purposes to a private individual or an entity for the purposes of carrying out an activity in which they are engaged.

Facilitation payments: payments or small gifts made or an individual - a public officer or an employee of a private company - in order to obtain a favor, such as expediting of an administrative proceeding, obtaining of an authorization, license or service, or to avoid the abuse of power.



Gift: for the purposes of this Policy, it includes a gift itself, presents, advantages, favors, free offerings or any other physical gift or a financial donation.

Bribery: whoever corrupts someone with gifts in order to obtain something in exchange.

Influence Peddling: whoever influences a public official or an authority, taking advantage of any situation arising from a personal relationship with such individual or another public official or an authority, in order to obtain a resolution that can give rise to direct or indirect economic benefit for himself or for a third party.

2. GIFT ACCEPTANCE

Gifts may not be requested or accepted, regardless of the Gift's nature, if its end goal is to make the recipient breach its obligations and give preference in granting goods or services, directly or indirectly, to a gift-giving individual or entity.

Gifts shall only be accepted in the circumstances admitted by social practices, in accordance with the following criteria:

- Gifts may not be accepted if, due to their extraordinary value or the circumstances under which they are received, it can be considered that, due to the reason or purpose thereof, such gift goes beyond the traditionally accepted aspects, in relation with traditional festivities or personal events (such as one's saint's day, anniversary, etc).
- Gifts may not be accepted from the individuals or companies when such are involved in the supplier tender processes.

In any case, the recipient can contact a supervisor of his or her center or their immediate superior with any concerns that may arise with regard to this matter.



3. GIFT GIVING

Gifts may not be offered or made, regardless of the Gift's nature, if its end goal is to make the recipient give preference to CaixaBank or to the person granting them when contracting goods or services or when settling, managing or processing files or decisions of any nature.

A) To private individuals

Gifts, presents, advantages or free offerings may be offered in circumstances approved by the Institutional Relations Department in accordance with socially accepted customs, as long as such items are listed in the catalog approved at the institution-wide level. Aside from that, Gifts offered to third parties must be approved by the Institutional Relations Department and be in line with the following principles:

- a) Monetary gift
- b) A gift should be such that it couldn't be considered a tool for influencing the recipient's decision.

B) To authorities or public officials

Gifts may not be offered or granted to authorities or public officials with regard to their job position or function, unless they are strictly in line with socially accepted customs.

As far as foreign authorities and if the local regulations do not prohibit gift giving, gifts may be offered or given only if they adhere to the criteria and requirements listed in the above section and an authorization is granted by the Industrial Relations Department which, in collaboration with the Legal Department, must obtain a favorable report from the local advisors.

4. EXTORTIONS, BRIBES AND FACILITATION PAYMENTS

Any conduct that may be understood as extortion within the scope of the business activity of the Entity by application of force or use of intimidation for the purposes of obtaining profits must be avoided.

Likewise the parties must avoid any conduct that can be considered bribing or intended bribing or authorities or public officials, carried out directly or indirectly or through a third party. Consequently, it is absolutely prohibited to provide Gifts, amounts, goods, rights or any other things so that, in exchange, authorities or public officers do or refrain from doing what they are supposed to do or commit any other illegal act.

Likewise, it is prohibited to make facilitation payments for the purposes of expediting procedures or facilitating the provision of a service, even if they are not made for the purposes of obtaining an undue benefit.

When it comes to foreign countries where gifts form part of the local culture, gift giving shall require an authorization granted by the Industrial Relations Department which, in collaboration with the Legal Department, must obtain a favorable report from the local advisors.



5. INFLUENCE PEDDLING:

It is prohibited to engage in any type of activity that can be considered as influence peddling and, in particular, activity aimed at influencing a public official or authority, taking advantage of any situation arising from personal relationship for the purposes of obtaining resolution that, directly or indirectly, can yield a benefit or avoid a loss (financial or otherwise), be that with CaixaBank, other related parties or any third party.

6. RELATIONSHIP WITH POLITICAL PARTIES

CaixaBank shall adhere, at all times, to the domestic regulation applicable to financing of political parties.

It is prohibited to make donations to political parties and their associated foundations. Debt forgiveness agreement can only be reached with political parties and their associated foundations when it is allowed by law and adheres to the general risk criteria of the Entity.

Potential participation of CaixaBank in influence groups linked to political parties shall be carried out in accordance with the action principles established in the Code of Ethics and the provisions of this Policy.

7. SPONSORSHIP

The purpose of sponsorship activities is to grant financial aid to the sponsored parties for the purposes of engaging in athletic, charitable, cultural, scientific or similar activities in exchange of their commitment to collaborate in marketing activities of CaixaBank.

In any case, sponsorship activity must be aimed at fortifying the image and business of CaixaBank. The manager in charge of sponsorship department shall implement procedures and controls for the purposes of avoiding performance of activities that are counter in spirit to the provisions of this Policy under the umbrella of sponsorship activities.

Whenever a sponsorship activity is carried out in a decentralized manner, actions shall be made, at all times, in conformity with the criteria set forth in the above paragraph.



8. TRAVEL AND REPRESENTATION EXPENSES

Travel and representation expenses shall be considered reasonable if they cannot be considered excessive or extravagant and give rise to the assumption that they are covering any concept other than the travel and representation itself, or that they are aimed to facilitate obtaining a business-related objective.

As far as expenses related to authorities or public officials and especially in case of foreign authorities, such must be handled in accordance with the guidelines provided by pertinent bodies, as to avoid that such are considered excessive or extravagant for that locality.

As much as possible, travel and representation expenses should be paid directly to the provider of service and, in any case, must be accompanied by a corresponding receipt.

9. DONATIONS AND CONTRIBUTIONS TO FOUNDATIONS AND OTHER NON-GOVERNMENT ENTITIES

CaixaBank forms part of the "la Caixa" Group, whose principal entity is a social welfare institution. Consequently, donations to foundations and other non-government entities must be justified by the activities of the "la Caixa" Group Welfare Projects and be in accordance with action guidelines set forth for the charitable activities of the Group and pertinent procedures established to that effect.

Such procedures shall include controls in order to avoid the possible use of donations and contributions made to foundations and other non-government entities as a subterfuge to carry out practices that are contrary to this Policy and the Code of Conduct and Ethics.

Whenever an activity is carried out in a decentralized manner, actions shall be made, at all times, in conformity with the criteria set forth in the above paragraph.



10. RISKY PROVIDERS

Under certain circumstances, CaixaBank may be affected by the corrupt activities undertaken by certain providers acting in the interest of the Company, which may have a legal and/or reputation impact.

Risky providers shall be considered those providers who collaborate with CaixaBank in the areas of government or authorities relations, in Spain or abroad. Likewise, such consideration shall also be given to service providers entrusted with generation of business for CaixaBank.

Contracts with risky provider shall require their expressly stated acceptance of this Policy. Additionally, the areas which require contracting of risk providers for the purposes of carrying out their activities must take into consideration, amongst other options, the occurrence of any of the following circumstances that may point out to the potential instances of corruption:

- Any family relationship between the clients or potential clients and the providers. Also, between the providers and authorities or public officials.
- Provider's refusal to accept this Policy or to sign a written pledge stating that it won't make payments for the achievement of its goals.
- Requests made by clients or providers with regard to issuing false invoices or documentation.
- Requests made by clients or potential clients, as well as the providers with regard to parties with unknown identity.
- Publicly available information that points out to a high level of corruption at the place of activity.
- Unusual or significantly high requests for charitable donations or contributions to political parties where such are admitted.
- Requirements for payments to be issued to tax havens or to companies that do not carry out a business activity (paper companies).
- Requirements of cash payments.
- Unusual or extravagant commissions in relation to the provided service. Unjustified requests for increasing the amount of commission payment in order to continue with a business relationship, when such amount has already been agreed.
- Insufficient amount of material means and manpower of the provider of services for performing expected activities.
- Travel and/or representation expenses that are not explained or poorly justified.
- Individuals or companies expressly recommended for hiring by authorities or public officials.

A mere concurrence of any of the aforementioned circumstances shall not have an adverse effect on supplier's hire. Nonetheless, an authorization expressly provided by the Legal Department shall be required for signing of this contract.



11. REPORTING CHANNEL

Reporting of individuals subject to the application scope of this Policy and formulated with regard to the non-compliance shall be handled through a confidential channel referenced in Section 1.3 of the Code of Ethics and resolved while safeguarding sender's confidentiality. Notifications from customers shall be handled through the customer service channels established by CaixaBank.