



Corporate Social Responsibility Policy

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Corporate Social Responsibility Policy

By means of this policy, the Board of Directors of CaixaBank, S.A. (hereinafter CaixaBank) intends to highlight the bank's commitment to an efficient and responsible operating model, characterised by a strong social vocation.

This *Corporate Social Responsibility Policy* reflects the bank's strategy and basic operating principles in terms of corporate responsibility, in line with the provisions of the Good Governance Code of listed companies and in accordance with the provisions of the Corporate Enterprises Act.

1. Objectives

The Corporate Social Responsibility Policy and the other instruments developed by the Group must contribute to:

- Favouring the attainment of the Group's strategic objectives using responsible and sustainable practices.
- Maximising the creation of shared value for stakeholders and creating long-term relationships based on trust and transparency.
- Preventing, minimising and mitigating the possible negative impacts derived from its activity.
- Helping to improve CaixaBank's reputation.
- Extending the responsible principles and practices within society, to advance together towards progress in social and environmental matters.

2. Scope of application of the Policy

Everyone who forms part of the CaixaBank Group must base their actions on good faith, integrity and common sense.

This Policy will be applicable to all employees, directors and members of the governing bodies of CaixaBank.

This is a Group Policy, so it will be applicable to the entire CaixaBank Group, constituting a reference document for all Group companies. The Governing and Management Bodies of these companies must take the pertinent decisions in order to integrate the stipulations of this policy at such companies, either by approving its own Policy in accordance with the principles established in this document or by adhering to those of CaixaBank, duly adapted where applicable.

3. Mission, vision and values

CaixaBank bases its management on responsible action and economic efficiency, with an orientation towards the socio-economic development of people and territory.

Its commitment to sustainable action, aimed at providing added value to the bank and its stakeholders, covers the entire value chain of the organisation, from the source of the funds and resources to their application and investment.

CaixaBank's **mission** is to fully meet the banking needs of the greatest possible number of customers, through an appropriate and complete range of products and excellent service quality, while maintaining the commitment to contribute value to customers, shareholders, employees and society at large.

Its **vision** is to be the leading financial Group in Spain, with a global approach, recognised for its social responsibility, quality of service, financial strength and ability to innovate.

CaixaBank always operates and provides its services on the basis of its corporate **values** of quality, trust and social commitment.

CaixaBank's Corporate Social Responsibility Policy is framed within the scope of the mission, vision and values of the bank. Through it, CaixaBank assumes the following as **guidelines** for the management and development of its activity:

- Integral, responsible and sustainable action.
- Economic efficiency.
- The adoption of a long-term decision-making perspective.
- Permanent innovation that contributes (as far as possible) to the sustainable development of communities

4. Operating procedures

4.1. Operating principles and support instruments

CaixaBank undertakes to operate in strict compliance with the regulations applicable to the development of its activity and in accordance with the highest ethical standards and professional conduct, always faithful to its commitment to provide value to its customers, shareholders and other stakeholders.

In this sense, **they are CaixaBank principles of action**, included and developed in the *Code of Business Conduct and Ethics*, compliance with laws and regulations in force at all times, respect, integrity, transparency, excellence, professionalism, confidentiality and social responsibility.

The Corporate Social Responsibility Policy is coherent and respectful of these operating principles, as well as the rest of the policies and standards developed by the Group that incorporate the values and standards that must be observed both in the internal professional relationships in the bank and in the external ones with the customers, shareholders and other stakeholders, in all the areas in which it works.

This Policy is developed and complemented, in addition to the CaixaBank Code of Business Conduct and Ethics, with other specific policies, rules and commitments related to its areas of application, as well as adherence to international initiatives in the area of corporate social responsibility, and which are detailed on the corporate website. These include the *Global Compact* and the *United Nations' Principles of Responsible Investment*.

4.2. General strategy for the management and good governance of CaixaBank

One of CaixaBank's main objectives is to guarantee the transparency, independence and good governance of the Bank in order to safeguard the interests of all stakeholders and gain their trust.

Within this framework, the strategy and actions of CaixaBank should be based, amongst others, on the following guidelines:

- **Respect human rights** in all the territories in which CaixaBank is present, in accordance with its *Human Rights Policy* and under the guidance of the *Universal Declaration of Human Rights*, the *Guiding Principles of the United Nations on Business and Human Rights*, the *OECD Guidelines for Multinational Enterprises* and other internationally recognised codes.

In particular, CaixaBank prohibits any discrimination, harassment, abuse or improper treatment for reasons of gender, race, colour, nationality, creed, religion, political opinion, ancestry, age, sexual orientation, civil status, handicap, disability or other circumstances protected by law, against employees, executives or officers, as well as shareholders, customers, potential customers and suppliers, or anyone else who interacts with the bank.

- **Comply with current legislation** at all times in the territories in which CaixaBank is present and favour free market practices, as well as regularly reviewing and improving government practices.
- **Base fiscal policy** on the principles of responsibility, prudence and transparency, in accordance with the legislation in force and the *Code of Good Tax Practices of the Spanish Government*, to which CaixaBank is affiliated.
- Establish the necessary measures to **prevent and avoid (insofar possible) that CaixaBank products and services may be used for unlawful conduct** (such as the financing of terrorism, money laundering or financial crimes) and review them periodically, actively collaborate with regulators and security forces and report all suspicious activities that are detected. To this end, responsible behaviour is promoted amongst the people who form the organisation, who must respect and apply the *Anti-Corruption Policy* and the other CaixaBank codes of conduct and rules.

In particular, regarding the prevention of money laundering, CaixaBank employees must collaborate discreetly and actively in the prevention of money laundering, receiving training courses on their responsibilities in this area.

- **Prudently and globally manage all risks** (financial and non-financial), based on the *General Risk Management Principles* and the *Group's Risk Appetite Framework*. Have adequate mechanisms to monitor the risks (financial and non-financial) included in the Corporate Risk Map.
- Keep the **confidential internal channel** available to employees to query and report codes of conduct.
- Promote the integration of **social and environmental criteria** in business decisions.
- **Promote transparency in the dissemination of information** to CaixaBank stakeholders, establishing sufficient communication channels and disseminating information in a clear and concise manner, adopting **responsible communication practices** at all times, that prevent the manipulation of information and protect integrity and honour.

4.3. Commitments in relation to the main stakeholders

Customers

CaixaBank places customers at the centre of its activity, and consequently, works to create value for both them and for the environment in which they operate.

In all relationships with customers, CaixaBank will act with honesty and professional responsibility, working at all times with a customer orientation, a long-term vision and the willingness to maintain their trust at all times.

In this respect, CaixaBank undertakes to:

- Offer **products adapted to the needs of customers**, with marketing policies reviewed by *specific committees*.

As a result, the marketing of the Bank's products is based on a **responsible sales policy**, which complies with legal regulations, such as the MiFID regulation. In this regard, CaixaBank has a Transparency Committee, in which the main areas related to the development and marketing of products are involved. This body determines all transparency-related aspects of the design and marketing of financial instruments, banking products and savings and investment plans. It also has a Product Committee, which is responsible for approving new products and services designed and marketed by the entity, after analysing the characteristics and risks of each product, and their compliance with customer protection and transparency rules.

- Encourage the **highest quality** of service, with periodic monitoring of customer satisfaction through surveys and other tools, and implement continuous improvement actions.
- Encourage **active dialogue** with customers and provide them with the necessary channels so that they can send their enquiries and complaints, and offer them a streamlined, personalised and quality response.

- **Communicate transparently and clearly** so that they can make informed decisions, in accordance with the *Commercial Communication Policy* and with the adoption of voluntary codes. This attitude is reflected, amongst other aspects, in CaixaBank's voluntary adherence to the Association for Commercial Self-Regulation (AUTOCONTROL), which promotes good advertising practices.
- Protect the **confidentiality** of data.
- Maintain the highest safety standards and, for this purpose, promote practices that maximise the **safety** of its products and services.
- Encourage **maximum accessibility** to CaixaBank products and services for as many people as possible.
- Maintain involvement in the territory, embodied by a **strong territorial presence**.

Shareholders and investors

CaixaBank works to match the trust that shareholders and investors have placed in it and, as far as possible, meet their needs and expectations. To do this, it seeks to offer tools and channels to facilitate their involvement and communication with the Bank and to exercise their rights as owners.

To this end, CaixaBank undertakes to:

- Guarantee **equal treatment**, helping shareholders to exercise their rights, within the framework of the Bank's corporate interest.
- Offer **clear, complete and truthful information** to the markets and shareholders, including financial and non-financial aspects of the business, and encourage informed participation in the Annual General Meeting.
- Offer **personalised attention** through the Shareholder Service, in accordance with the *Policy on Information, Communication and Contacts with Shareholders, Institutional Investors and Voting Advisors*.
- Promote initiatives for **training, information** and **service** for shareholders.
- Comply with the *Internal Protocol for relations between the "la Caixa" Banking Foundation, CriteriaCaixa and CaixaBank*, which is available on the Bank's corporate website.

Employees

CaixaBank professionals are its main asset, and the success of the organisation's sustainability and social and economic effectiveness depend on them.

Under this premise, CaixaBank undertakes to:

- Respect the **labour rights** recognised in national and international legislation (the eight Fundamental Conventions of the International Labour Organisation).
- Base the people management policy on **respect for diversity, equal opportunities and non-discrimination for reasons of gender, age, disability or any other circumstance**, promoting diversity, social inclusion and an adequate, dignified and professional work environment.
- **Integrate the perspective of equal treatment and opportunities for people**, included in the *Equality Plan* and in adherence to initiatives such as the *United Nations' Principles for the Empowerment of Women*.
- Promote **employment stability**, work-life balance and well-being of the workforce in the workplace, in accordance with the Equality and Conciliation Protocol.
- Manage the talent of the organisation to promote the professional development of professionals:
 - With performance-based criteria to be included in internal selection processes.
 - Favouring the attracting and retaining of talent.
 - By means of a **Training Plan** adapted to the different groups.
- *Apply the Occupational Risk Prevention Policy to guarantee the safety of the workforce and maintain their health regardless of the job.*
- Encourage **dialogue** and internal communication, and measure their degree of satisfaction through workplace climate surveys.

Company

CaixaBank has a management model consistent with its commitment to the socio-economic development of the territory.

Based on this commitment, CaixaBank works to:

- Promote **financial inclusion**, facilitating access to the financial markets by persons and groups whose profile excludes them from going through customary marketing channels:

- Through MicroBank, its social bank, the only specialised in microfinance in Spain.
- Promoting training practices to promote and expand the financial culture amongst the population.
- Collaborating and encouraging participation in the programmes and initiatives driven by its reference shareholder, the "la Caixa" Banking Foundation by promoting them.
- Promoting the "la Caixa" Volunteers programme and its volunteer activities in the community.
- **Participating in initiatives and collaborating with regulators, organisations and entities** dedicated to the dissemination and promotion of responsible practices amongst customers and communities in which CaixaBank is present.

Environmental

CaixaBank establishes the management of its business, its projects, products and services on the respect and protection of the environment, committing itself to the conservation of the environment and respecting the current legislation in this matter in each case.

To this commitment, included in the *Environmental and Energy Policy*, is added CaixaBank's will to:

- Create products and services aligned with a **sustainable development model**.
- Favour the funding of projects that help boost **energy efficiency** and foster long-term environmental sustainability.
- **Integrate environmental and social risks** into the risk analysis of the financing of investment projects.
- Strive to comply with the highest **environmental standards** in the countries in which it operates.
- Work to improve internal processes and operations to efficiently manage resources and **minimise environmental** impact.
- Encouraging a responsible attitude amongst employees, customers and society in general.
- Participate in international initiatives, such as the **Equator Principles or the Carbon Disclosure Project (CDP)**, to move forward in this line.

Suppliers

CaixaBank tries to manage its supply chain responsibly, as set out in the *ethical, environmental and social criteria* for suppliers.

To do so, CaixaBank assumes the following commitments:

- Guarantee maximum **contract transparency** which is channelled through auctions in those services where it is advisable, and requests for offers.
- Work with suppliers that **respect fundamental human and labour rights** in the exercise of their activity.
- **Promote responsible practices** amongst suppliers and their supply chain, through contractual clauses and the dissemination of sustainable initiatives.
- Audit their labour, social and environmental practices and act accordingly when the practices or results detected are not satisfactory.

4.4. Channels for stakeholder communication, participation and dialogue.

CaixaBank keeps various **channels of communication, participation and dialogue** available for its stakeholders and undertakes to give them the maximum possible dissemination.

These channels, which are detailed in the *Policy for Information, Communication and Contacts with Shareholders, Institutional Investors and Voting Advisors* approved by the CaixaBank Board of Directors and on the *corporate website*, include: free-phone numbers and electronic mailboxes for customer and shareholder service; Customer and Shareholder Service Offices; online participation platforms for customers and employees; meetings and conferences; periodic opinion polls; press releases and other active dialogue channels with the media.

5. Monitoring and supervision of the corporate responsibility practices

In accordance with the provisions of the CaixaBank corporate texts and the applicable regulations, the approval of the Corporate Social Responsibility Policy corresponds to the **CaixaBank Board of Directors**, which will adopt the necessary measures for the implementation and supervision of the development and application of the Policy, being the recipient of the annual reports prepared for this purpose on its application and result.

Meanwhile, the **Appointments Committee** is responsible, amongst other duties, for supervising the Bank's performance in relation to matters regarding corporate social responsibility and for submitting the proposals it deems appropriate in this matter to the Board.

Likewise, to ensure an appropriate decision-making process, CaixaBank has a **Corporate Responsibility and Reputation Committee** to propose the policy and the strategic lines of reputation management to the corresponding governing bodies and the Management Committee, to establish management and control measures regarding corporate responsibility, to select and review the key performance indicators and to review and approve corporate responsibility programmes.

The duties of the **Executive Communication, Institutional Relations, Brand and CSR Division** include the implementation of the corporate responsibility strategy and executing the relevant action plans agreed by the governing bodies. To carry out its duties, it has, amongst other instruments, the Reputation Scorecard, which facilitates the management and monitoring of the strategy and action plans in the area of corporate social responsibility. Likewise, the reputational risks map, integrated in the Corporate Risk Map, facilitates the management of corporate social responsibility and makes it possible to assess and manage the main risks that may affect the Bank's reputation.

Lastly, and particularly in relation to risk supervision, the **CaixaBank's Risks Committee** is entrusted with overseeing and examining the processes of reporting and controlling the Group's risks, including non-financial risks.

CaixaBank is committed to transparently and periodically providing sufficient information on the application, development and results of this Policy through its public reports and website, as well as any other channel it considers appropriate for said purpose.

Policy approved by the Board of Directors on 17 September 2015, and revised on 22 February 2018.