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CaixaBank S.A. (‘CaixaBank’ or the ‘Company’) fully rejects any type of corruption, works under the core principle of compliance with current laws and regulations at all times, and bases its operation on the highest standards of responsibility. As a signatory to the United Nations Global Compact, CaixaBank undertakes to comply with the 10 principles it sets out, including working against corruption in all its forms, including extortion and bribery (Principle 10).

Within this framework, the CaixaBank Board of Directors approves this Anti-corruption Policy (hereinafter, “the Policy”) as an essential tool to impede the Company and its external collaborators, directly or through intermediaries, from engaging in conduct that may be against the law or the core business principles of CaixaBank: respect, integrity, transparency, excellence, professionalism, confidentiality and social responsibility.

CaixaBank takes an active stance in rejecting all forms of corruption in all the markets where it operates, adapting this Policy to the highest international standards, alongside the Code of Business Conduct and Ethics. If local laws are stricter than this Policy, they will apply.

This Policy is applicable to all CaixaBank companies, its employees, directors and corporate officers. In turn, the CaixaBank Group shall share this Policy with those companies in which holds a significant stake although it does not have control, encouraging them to adopt it.

The Anti-corruption Policy will be available for all the Covered Parties on the Compliance website and also on the Corporate Social Responsibility website. Similarly, the Policy will be made public on CaixaBank’s Corporate Website.
Main impacts of the policy

Gifts

Accepting
Gifts in any amount are forbidden in the aim is influence in the employee.

In the rest of cases, maximum amount of 150€ per year / same giver.

Gifts are forbidden if are from authorities or officials, companies involved in supplier tender processes or Gifts in cash or equivalent.

Exclusions
Gifts from CaixaBank to employees or between employees.

Invitations to food during the course of a current professional relationship, as long as the invitation is reasonable context being developed.

Giving
Institutional Gifts can only be offered where they are included in the catalogue approved institutionally.

Giving Gifts to public officials and authorities is prohibited.

Travelling expenses and hospitality

Hospitality from third parties
The invitations shall be reasonable and not excessive or extravagant.

The invitations shall be deemed to be made to CaixaBank.

The travel, accommodation and representation expenses payable shall always be covered by CaixaBank.

Sponsorship
Any payment that is obtained beyond it strictly established in the sponsorship agreements will have the consideration of gift.

This policy will come into force on 01/02/2019.
Scope of application

Covered Parties

The Covered Parties in this Policy are all employees and members of the administrative bodies at CaixaBank.

The Covered Parties shall receive training aimed at ensuring appropriate awareness of the Policy to guarantee an ethical culture of integrity and regulatory compliance is established.

Failure to comply with what is set out in this Policy may lead to disciplinary action by the internal bodies authorized to implement it.

Associated Parties

Within the framework of mutual trust and collaboration with all its Associated Parties, CaixaBank expects them to take the appropriate measures to ensure fair behavior and competition on the market. For this reason, all Associated Parties with CaixaBank shall be made participants in this Policy, as long as current specific circumstances so allow, particularly including suppliers, intermediaries and agents who act on behalf of the Company.

CaixaBank shall promote Associated Parties be experts on the existence and content of the policy. Where this is not possible, CaixaBank shall ensure that they comply with similar conduct and value patterns to those set out in the Policy.

Specific awareness of incompliance with any of the provisions in the Policy shall mean current contractual relationships are terminated.
In a broad sense, corruption is a conduct whose impact must be prevented and eradicated at both companies and in society.

The principles governing this Policy are as follows:

1. Complete rejection of any action or omission that is directly or indirectly related to acts of corruption. This includes situations where the Covered Party takes a stance of conscious or deliberate ignorance (willful blindness) regarding acts whose awareness is mandatory for the party.

2. The banning of illicit actions and/or those not aligned with current regulations, including what is set out in this Policy, under the premise that one is operating in favor of the Company regardless of the possible financial benefit created.

3. Covered Parties are subject to reporting any event that they are aware of that contravenes what is set out in the Policy. This notification shall be done via the Enquiries and Complaints Channel set up by CaixaBank.

4. Compliance with fairness standards in the market, in accordance with the principles ensuring free competition.

Corruption prevention measures are part of the CaixaBank Crime Prevention Model. For this reason, the principles set out in the Criminal Compliance Policy directly apply.
1. CaixaBank shall have due diligence procedures in the selection and maintenance processes for relations it has with parties linked to the company, especially with regard to its employees, so as to ensure alignment with CaixaBank values and full compliance with the law and internal ethical standards.

In all its contracting processes, CaixaBank shall ensure that candidates have the prior required technical qualifications and experience, with said procedure being appropriately documented. Personal/family relationships may not be used to contract those who do not comply with the selection criteria.

2. With regard to Associated Parties, CaixaBank contracting with any group included in this category shall comply with objective criteria, without any influence from financial or other types of ties having an effect. CaixaBank shall require that they all 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.

3. Through its KYC policies and procedures (know your client), CaixaBank shall undertake a suitable process to get to know, accept and monitor customers.
anti-corruption policy
standards of conduct

a. extortion, bribes, influence peddling and facilitation payments

CaixaBank forbids all conduct that may constitute or be related to *extortion* in all its possible forms.

Likewise, CaixaBank rejects any conduct that may constitute *bribery* or attempted bribery in relation to authorities or civil servants, whether this be direct or indirect or via an intermediary. Consequently, giving Gifts, amounts of money, assets, rights or any other asset or service in exchange for authorities or civil servants ensuring or ceasing compliance with what they should do or undertake with regard to an illicit act shall not be tolerated.

Any type of activity that may constitute *influence peddling* is prohibited.

Similarly, *facilitation payments* of any kind or in any method that may be adopted are completely prohibited. Gifts may only be accepted or offered in line with what is set out in this Policy.

Any activity suspected of constituting any of the conduct set out shall be reported to Regulatory Compliance through the Enquiries and Complaints Channel.

b. Gifts

.Accepting Gifts

Directly or indirectly accepting any type of Gift or any amount whose purpose is to ensure the Covered Party, by failing to comply with their obligations, directly or indirectly favors the person or company who gives said gift in contracting goods or services is completely prohibited.

In any event, the criteria that shall govern the acceptance of Gifts are as follows:

1. With regard to the *amount* of the Gift:
   
   The value of the Gift may not be higher than €150 or equivalent in other currency, with its value being determined as per its market value and not purchase cost. Where a Covered Party receives several gifts from the same giver in a 12-month period, the €150 limit shall apply to the total value of all gifts.
2. The Gift shall be voluntary and may not have been previously requested. In the same way, acceptance of the Gift shall not generate expectations in the giver of quid-pro-quo.

3. The Gifts shall be received in the workplace and never at the private home of the employee or in the home of family members and/or close relatives. Where this is not the case, the employee’s supervisor shall be notified.

Receiving Gifts, whether directly or indirectly, is expressly forbidden where any of the following circumstances arise:

— The Gift is from public authorities or officials.
— The Gift is from people or companies who are involved in supplier tender processes at any of the CaixaBank Group companies, as long as the Covered Party is a part of the tender processes or may have an influence over them.
— The Gift is made in cash or equivalent, regardless of the amount (e.g. gift cards).

The following are excluded from the content of this section:

— Gifts from CaixaBank to the Covered Parties or between the Covered Parties, whether there is a hierarchical relationship or not.
— Invitations to food made during the course of a current professional relationship, as long as the invitation is reasonable within the business context being developed.

Giving Gifts.
In general

1. Institutional Gifts may only be offered where they are included in the catalogue approved institutionally and managed by the Communications, Institutional Relations, Brand and CSR Department. Exceptionally, Institutional Relationships, subject to a report from Regulatory Compliance, may authorize the giving of another type of Gift as long as this has been checked beforehand and is proportionate to the circumstance and allowed by social custom.
2. Giving Gifts to public officials and authorities is strictly prohibited. Exceptionally, and provided that the applicable regulations do not forbid it, offering or giving Gifts may be done with authorization from Institutional Relations, subject to a report from Regulatory Compliance, who may also request a report from a legal advisor if deemed appropriate.

c. Travelling expenses and hospitality

‘Hospitality’ received from third parties

Invitations to events or acts held by suppliers or third-party companies shall be deemed to be made to CaixaBank, meaning the travel, accommodation and representation expenses payable shall always be covered by CaixaBank and paid directly to the service provider in accordance with the internal employee expenses procedure regulations.

These travel, accommodation and representation expenses shall comply with the following criteria:

1. They shall be reasonable and not excessive or extravagant, avoiding any interpretation that they are covering any other service to their inherent purpose or that an attempt is being made to influence the granting of any business.

2. They shall be related to Company business.

3. They shall always be deemed institutional, whereby the decision to attend and authorization thereof shall require approval by the responsible Manager.

‘Hospitality’ offered by CaixaBank

The same criteria apply to CaixaBank covering third-party travel and accommodation expenses.

d. Relations with political institutions and officials

CaixaBank shall at all times observe strict compliance with national legislation regarding the financing of political parties. For this purpose, internal mandatory regulations have been produced.

It is prohibited to make donations to political parties and their associated foundations. Debt forgiveness agreements 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.
CaixaBank will participate in the regulatory processes for relevant issues regarding the national, European and global financial sector with the aim of protecting the interests of clients, shareholders and employees. CaixaBank will not contract direct lobbying or representation of interest services to position itself to authorities but shall instead generally share its opinions via different associations to try agree on the position of the industry, all in accordance with the business principles set out in the Code of Ethics, this Policy and applicable internal regulations. The list of the relevant associations to which CaixaBank belongs is published on the corporate website.

### e. Sponsorship

The purpose of sponsorship by CaixaBank shall be to grant financial aid/support to awardees to undertake their institutional, corporate, social, sports, cultural, scientific or similar activities in exchange for the commitment of the latter in collaborating in CaixaBank advertising activities, as well as other services for the bank in exchange of sponsorship, such as *hospitality* agreements (tickets) or the possibility of activating sponsorship by organizing activities and events with CaixaBank branding.

In any case, sponsorship activity must be aimed at fortifying the brand and business of CaixaBank.

Any department that is considering the possibility of supporting activities through sponsorship or similar shall consult the Area or Department responsible for managing sponsorship. This shall be responsible for resolving any doubts that may arise in the departments and shall be responsible for deciding on whether a specific activity may be sponsored. In turn, it shall ensure strategic alignment of the sponsorships and implement the appropriate procedures for said purpose.

These procedures shall include controls to avoid sponsorship that may be used as subterfuge to carry out practices that contravene this Policy and the Code of Business Conduct and Ethics.

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

CaixaBank collaborates via the ‘La Caixa’ Banking Foundation and on its behalf to introduce its social welfare activity to CaixaBank’s entire area of activity. Consequently, donations to foundations and other non-government institutions must be justified by the activities of the “La Caixa” Group Welfare Projects and be in accordance with action guidelines set out for its charitable activities and pertinent procedures be established to that effect.

Such procedures shall include controls in order to avoid donations and contributions made to foundations and other non-government institutions possibly being used as a subterfuge to carry out practices that contravene this Policy and the Code of Business Conduct and Ethics.

Whenever an activity is carried out in a decentralized manner, actions shall be made, at all times, in accordance with the criteria set out above and the internal regulations.

g. Risky suppliers

Under certain circumstances, CaixaBank may be affected by the corrupt activities undertaken by certain providers acting in the interest or on behalf of the Company, which may have a legal and/or reputation impact. This may even mean that CaixaBank could be deemed responsible for the acts undertaken by its suppliers.

Being deemed a Risky Supplier arises from assessment by subcontracting governance, which identifies the supplier meeting the aforementioned parameters in the category of very high risk and, thus, being deemed risky.

Contracts with Risky Suppliers shall require their expressly stated acceptance of this Policy.

Additionally, the areas which require contracting of Risky Suppliers for the purposes of carrying out their activities will have to take into consideration, among other options, the occurrence of any of the circumstances included in internal regulations. Observance thereof shall activate control systems that involved strengthened diligence regarding the process/relationship.
To facilitate compliance with the codes of conduct, CaixaBank has a Confidential Enquiries and Complaints Channel set out in the Code of Ethics through which doubts regarding the interpretation or practical application of the Policy may be presented and possible infringements reported.

All CaixaBank employees have access to the Enquiries and Complaints Channel. Similarly, CaixaBank will promote that people who have a relationship with the Company, such as members of the Management Bodies and Associated Parties, may also access it. With regard to complaints from customers, these shall be processed by the customer service channels set up at CaixaBank.

The Service Channel is accessible via the Compliance website.

Complaints shall be resolved by using a rigorous, transparent and objective procedure, safeguarding the confidentiality of the reporter at all times. CaixaBank will not tolerate any reprisal against those who in good faith report events or situations that may fall under prohibited conduct as set out in the Code of Ethics or this Anticorruption Policy. Along these lines, CaixaBank shall continually work to align communication channels with best practice at all times.
The Anticorruption Policy was approved by the Board of Directors of CaixaBank in its meeting on 31st January 2019, coming into force on 1st February 2019.

This Policy substitutes the CaixaBank action policy in anti-corruption matters in its entirety that has been valid to the present.
**Conflict of interest:** disagreement or discrepancies between the professional duty of a physical or legal person and their private interests and/or those of another physical or legal person that unduly influences the performance of their duties and responsibilities.

**Corruption or the act of bribery:** fraudulent conduct comprising the offer, promise, giving or acceptance of an improper advantage for or by a government official or an employee or representative of a private company, either directly or indirectly to obtain or keep a business or another illicit advantage. The performance of this act may be either national or international in scope.

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

**CaixaBank Group:** refers to CaixaBank, S.A., as well as to all CAIXABANK investee companies over which it has control in accordance with article 42 of the Spanish Commercial Code.

**Hospitality:** hospitality. The covering of certain expenses by the organizer of an event.

**The United Nations Global Compact:** a voluntary initiative for corporate social responsibility and global sustainable development, aimed at generating shared value between members. Its mission is to support business sustainability through the implementation of 10 Universal Principles of Conduct and Action with regard to Human Rights, employment standards, the environment and the fight against corruption.

**Facilitation payment:** payments or small gifts made or an individual - a public official or an employee of a private company - in order to obtain a favor, such as expediting an administrative procedure, obtaining a permit, license or service, or avoiding an abuse of power.

**Sponsorship:** financial or any other type of aid, generally provided for advertising and gaining business to a private individual or company for the purposes of carrying out an activity in which they are engaged.

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1. Definition of the International Chamber Of Commerce, the UN Convention against Corruption and the OECD Convention.
2. United Nations Global Compact (www.unglobalcompact.org/).
**Associated Parties:** physical or legal persons with which CaixaBank has any type of business relationship. This includes those who provide services through temporary employment companies or academic agreements, intermediaries, agents, brokers, external consultants or physical or legal persons contracted to deliver goods or service provision.

**Covered Parties:** people to whom what is set out in this Policy mandatorily applies.

**Risky Supplier:** a supplier, in Spain or overseas, that has a professional relationship with governments or authorities.

**Gift:** free gifts, services, advantages, favors, provisions or any other physical present or pecuniary donation (payments or fees). Travel and hospitality expenses are excluded and have their own regulations in this Anticorruption Policy.

**Institutional Gift:** a gift or physical present that have been validated and certified beforehand by Institutional Relations. They generally include Company-branded items such as the logo or brand name.

**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 could give rise to direct or indirect financial benefit for him/herself or for a third party.

\[\text{By way of example, Gifts are deemed to be promotional gifts, courtesy gifts for traditional celebrations such as birthdays or at Christmas, or invitations to entertainment events such as sporting or musical events, among others.}\]