



## **Corporate Social Responsibility Policy**

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## Corporate Social Responsibility Policy

The Rules of the Board of Directors of CaixaBank, S.A. (hereinafter referred to as "**CaixaBank**" or the "**Entity**") establish that its duties include ensuring observance of "*any additional principles of social responsibility that the Company may voluntarily decide to accept*" and, in accordance with the Capital Companies Act, approving the corporate social responsibility policy.

By virtue of the above, at its meeting of September 17, the CaixaBank Board of Directors agreed to approve this *Corporate Social Responsibility Policy*, which includes the Entity's strategy and basic principles with regard to corporate social responsibility, as envisaged in the listed companies' Code of Good Governance.

### 1. Mission, vision and values

Responsible action and economic efficiency are the basis for CaixaBank's management, focusing on the socio-economic development of people and of the local area.

Its sustainability commitment, geared to providing added value for the Entity and its stakeholders, extends to the organisation's entire value chain, from the origin of the funds and resources to their application and investment.

CaixaBank's **mission** is to fully cater to the financial needs of the highest possible number of customers through a full, adequate range of products and excellent quality service, with a commitment to providing value for customers, shareholders, employees and society as a whole.

Its **vision** is to be Spain's leading financial group, with a global vocation, acknowledged for its social responsibility, high-quality service, financial strength and innovation capacity.

CaixaBank always carries out its business and provides its services in line with its corporate **values** of quality, trust and social commitment.

Its Corporate Social Responsibility Policy falls within the scope of the Entity's mission, vision and values. Through this Policy, CaixaBank assumes the following **guidelines** for the management and development of its business:

- Responsible, sustainable action.
- Economic efficiency.
- Adopting a long-term perspective for decision-making.
- Constant innovation, contributing to the communities' sustainable development to the fullest possible extent.

## 2. Principles and support instruments

CaixaBank undertakes to carry out its business in strict compliance with the applicable standards and regulations, in line with the highest standards of ethics and professional conduct, always true to its commitment of providing value for its customers, shareholders and other stakeholders.

**CaixaBank's principles**, as listed and developed in the *Code of Business Conduct and Ethics*, thus consist of compliance with the laws and regulations applicable at all times, respect, integrity, transparency, excellence, professionalism, confidentiality and social responsibility.

The Corporate Social Responsibility Policy is coherent with and respectful of these principles, as are the other policies and regulations developed by the Group, which include the values and standards to be observed with regard to both internal professional relationships within the Entity and external relationships with customers, shareholders and other stakeholders, in all the areas it works in.

In addition to its *Code of Business Conduct and Ethics*, CaixaBank also develops and complements this Policy with other specific policies, standards and commitments relating to their areas of application and with adherence to international corporate social responsibility initiatives, which are detailed on the corporate website. These include the *Global Compact* and the *United Nations Principles for Responsible Investment*.

## 3. Aims and scope of application of the Policy

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

- Helping the Group to achieve its strategic objectives through responsible, sustainable practices.
- Maximising shared value creation for stakeholders and creating long-term business relationships based on trust and transparency.
- Preventing, minimising and mitigating any possible negative impact deriving from its work.
- Contributing to improving CaixaBank's reputation.
- Extending the principles of responsibility and responsible practices throughout society, in order to progress together in the social and environmental spheres.

All CaixaBank's staff must base their work on good faith, integrity and common sense. This Policy is applicable to all the Group's employees, managers and members of its governing body. CaixaBank will also encourage the Entity's subsidiary and investee companies to be governed by similar standards of conduct and values to those set out in the Policy.

## 4. General corporate strategy for CaixaBank's management and good governance

One of CaixaBank's priority goals is to guarantee the Entity's transparency, independence and good governance in order to safeguard the interests of all the stakeholders and earn their trust.

Within this framework, CaixaBank's strategy and action must be based on the following guidelines for conduct, among others:

- **Respect for human rights** in all areas in which CaixaBank works, under the auspices of the *Universal Declaration of Human Rights*, the *United Nations Guiding Principles on Business and Human Rights*, the *OECD Guidelines for Multinational Enterprises* and other internationally recognised codes.

In particular, CaixaBank prohibits all forms of discrimination, harassment, abuse and inappropriate treatment based on gender, race, colour, nationality, creed, religion, political opinion, affiliation, age, sexual orientation, status, disability, incapacity or any other situations protected by law with regard to employees, managers and members of the governing body, as well as shareholders, customers, potential customers or suppliers and any other person interacting with the Entity.

- **Compliance with applicable legislation** at all times in the areas in which CaixaBank works, favouring free market practices and regularly reviewing and improving its governance practices.
- **Basing its tax policy** on the principles of responsibility, prudence and transparency, in accordance with current legislation and the *Spanish Government's Code of Good Tax Practice*, to which CaixaBank adheres.
- Establishing the necessary means to **prevent and avoid, to the fullest extent, any possibility of CaixaBank's products and services being used for illicit conduct** (such as terrorism financing, money laundering or financial crime) and regularly reviewing them, actively collaborating with the regulators and security forces and reporting any suspicious activity detected. For this purpose, the responsible conduct of the organisation's staff is encouraged, and they must respect and apply the *Customer Acceptance Policy*, the *Anticorruption Policy* and all other CaixaBank codes of conduct and standards.

In particular, with regard to money laundering prevention, CaixaBank's employees must actively and discreetly collaborate to this end, receiving training courses on their responsibilities in this regard.

- **Prudent global risk management** (for financial and non-financial risks), on the basis of the *General Principles of Risk Management* and the Group's *Risk Appetite Framework*, and having adequate risk supervision mechanisms (for financial and non-financial risks) included on the Corporate Risk Map.
- Maintaining the **internal confidential channel** open to its employees for enquiries and complaints regarding the code of conduct.
- Promoting the integration of **social and environmental criteria** for business decision-making.

- **Encouraging transparency on disseminating information** to the CaixaBank stakeholders, establishing sufficient communication channels and putting across the information clearly and concisely, adopting **responsible communication practices** at all times to prevent manipulation of information and protect integrity and honour.

## 5. Commitments regarding the main stakeholders

### 5.1. Customers

CaixaBank's customers are the centrepiece of its business, and it therefore works to create value for both the customers themselves and the environment in which it operates.

In all its customer relationships, CaixaBank will act with integrity and professional responsibility, constantly focusing its work on its customers, with a long-term perspective and striving to maintain their trust at all times.

With this goal in mind, CaixaBank undertakes to:

- Offer **products suited to its customers' needs**, with marketing policies reviewed by *specific committees*.

The Entity's product marketing is thus based on a **responsible sales policy**, compliant with legal standards, such as the MiFID regulations. For this purpose, CaixaBank has a Financial Product Transparency Committee involving the main departments connected with product development and marketing, for debating all issues concerning product transparency and services provided to customers.

- Promoting **maximum quality** of service, with regular monitoring of customer satisfaction through surveys and other mechanisms, and implementing continuous improvement measures.
- Encouraging **active dialogue** with customers and providing them with the necessary channels to transmit their queries and complaints and offering a speedy, personalised, quality response.
- **Providing clear, transparent communication** so that they can make informed decisions, in accordance with the *Commercial Communication Policy* and voluntary adoption of codes. This stance, among other aspects, is reflected in CaixaBank's voluntary adherence to the Commercial self-inspection association *Autocontrol*, in favour of good advertising practice.
- Protecting the **confidentiality** of its data.
- Maintaining the highest standards of security, and, with this aim in mind, promoting practices maximising the **security** of its products and services.

- Encouraging **maximum accessibility** by the greatest possible number of people to CaixaBank products and services.
- Maintaining its involvement with the local area, structured through a **wide regional presence**.

## 5.2. Shareholders and investors

CaixaBank works to reciprocate the trust placed in it by shareholders and investors and to cater to their needs and expectations to the fullest extent possible. For this purpose, it seeks to provide tools and channels facilitating their involvement and communication with the Entity and the exercise of their rights as partners.

CaixaBank thus undertakes to:

- Guarantee **equal treatment**, helping shareholders to exercise their rights, within the framework of the Entity's social interest.
- Offering **clear, full and accurate** information to markets and shareholders, including financial and non-financial aspects of the business, and encouraging informed participation in the General Shareholders' Meetings.
- Offering **personalised attention** through the Shareholder Service Department, in accordance with the *Policy on Information, Communication and Contact with Shareholders, Institutional Investors and Voting Advisors*.
- Promoting **training, information and attention** initiatives for shareholders.
- Complying with the *Internal Relations Protocol between CaixaBank and its controlling shareholder*, the "la Caixa" Banking Foundation, which is available on the Entity's corporate website.

## 5.3. Employees

CaixaBank's professionals are its main asset, and are the basis for the success of the organisation's sustainability and social and economic efficiency.

According to this premise, CaixaBank undertakes to:

- Respect the **labour rights** acknowledged in national and international legislation (the eight International Labour Organisation Core Conventions).
- Base its people management policy on **respect for diversity, equal opportunities and non-discrimination on the basis of gender, age, disability or any other reason**, encouraging diversity, social inclusion and an adequate, sound and professional working environment.

- **Integrate the equal treatment and opportunities perspective**, included in the *Equality Plan* and by adherence to initiatives such as the *UN Women's Empowerment Principles*.
- Promote **stable employment, reconciliation** of work and family life and the wellbeing of the staff in the working environment, in accordance with the *Equality and Conciliation Protocol*.
- **Manage talent** within the organisation to nurture the staff's **professional development**:
  - Using meritocratic criteria in internal recruitment processes.
  - Seeking to attract and retain talent.
  - Through a **Training Plan** adapted to the different groups.
- Applying the *Occupational Risk Prevention Policy* to guarantee the staff's **safety** and maintain their **health**, regardless of their post.
- Encouraging **dialogue** and internal communication, and measuring their degree of satisfaction through regular working environment surveys.

#### 5.4. Society

CaixaBank has a management model that is coherent with its commitment to regional socio-economic development.

On the basis of this commitment, CaixaBank works to:

- Promote **financial inclusion**, facilitating access to the financial market by people and groups whose characteristics may lead to their being marginalised from the habitual circuits:
  - Through MicroBank, its social bank, the only specialist micro-financing bank in Spain.
  - Encouraging training practices to promote and extend the financial culture among the population.
- Collaborating and encouraging participation in the programmes and initiatives run by its controlling shareholder, **the "la Caixa" Banking Foundation**, and disseminating these initiatives.
- Promoting "la Caixa" **Volunteering programme** and its volunteering work in the community.
- **Participating in initiatives and collaborating with regulators, organisations and entities** who disseminate and promote responsible practice among the customers and communities in which CaixaBank works.

## 5.5 The environment

CaixaBank bases the management of its business, projects, products and services on respect and environmental concern, undertaking to preserve the environment and always observing the applicable legislation in this area.

In addition to this commitment, which is included in its *Environmental Policy*, CaixaBank also undertakes to:

- Create products and services in line with a **sustainable development** model.
- Favour the funding of projects that will contribute to improving **energy efficiency** and achieving greater long-term environmental sustainability.
- **Including environmental and social risks** in its risk analysis for investment project funding.
- Striving to comply with the highest **environmental standards** in the countries it works in.
- Working to improve internal processes and operations in order to efficiently manage resources and **minimise environmental impact**.
- Encourage a responsible attitude among its employees, customers and society in general, through the **EcoCaixa** website, among other initiatives.
- Involvement in international initiatives such as the **Equator Principles or the Carbon Disclosure Project (CDP)**, to achieve progress in this area.

### 5.5. Suppliers

CaixaBank seeks to responsibly manage its supply chain, as described in its *Ethical, Environmental and Social Criteria* for Suppliers.

CaixaBank thus undertakes to:

- Guarantee maximum **transparency on outsourcing**, channelled through auctions for any services where this is advisable, and requests for tender.
- Work only with suppliers who **respect the basic human and labour rights** on carrying out their business.
- **Encourage responsible practices** between the suppliers and its supply chain, by means of contract clauses and dissemination of sustainable initiatives.
- Carry out **audits** of its labour, social and environmental practices, acting in consequence when unsatisfactory practices or results are detected.

## 6. Channels for communication, participation and dialogue with stakeholders

CaixaBank maintains different **channels for communication, participation and dialogue** open to stakeholders, undertaking to provide maximum dissemination of the same.

These channels, which are detailed in the *Policy on Information, Communication and Contact with Shareholders, Institutional Investors and Voting Advisors* approved by the CaixaBank Board of Directors and which figure on the *corporate website*, include free hotlines and e-mailboxes for attention to customers and shareholders, Customer and Shareholder Service Centres, online participation platforms for customers and employees, meetings and conferences, regular opinion polls, press releases and other active channels for dialogue with the media.

## 7. Monitoring and supervision of corporate social responsibility practices

In accordance with CaixaBank's corporate texts and the applicable legislation, CaixaBank's **Board of Directors** must approve the Corporate Social Responsibility Policy, adopting the necessary means for implementing and supervising the Policy's development and application and receiving the annual reports drawn up for this purpose concerning its application and results.

Also, the **Appointment Committee's** duties include supervising the Entity's action with regard to corporate social responsibility issues and submitting the proposals it considers relevant to the Board.

Similarly, to ensure an adequate decision-making process, CaixaBank has a **Corporate Responsibility and Reputation Committee**, which proposes the policy and strategic lines of reputational management to the Entity's Management Committee, establishes management and control measures for corporate responsibility, selects and reviews key performance indicators and reviews and approves the corporate responsibility programmes.

The duties of the **Corporate Division of Corporate Communication, Institutional Relations, Brand and CSR** include implementing the corporate responsibility strategy and carrying out the action plans in this area agreed on by the governing bodies. Among other instruments, it uses the Reputational Control Chart to perform its duties, to facilitate management and monitoring of the strategy and of the corporate social responsibility action plans. The reputational risk map, which forms part of the Corporate Risk Map, also enables assessment and management of the main risks that could affect the Entity's reputation.

Lastly, and particularly related to risk supervision, the CaixaBank **Risk Committee's** duties include supervising and studying the Group's risk reporting and control processes, including non-financial risks.

*CaixaBank undertakes to provide sufficient information on the application, development and results of this Policy, regularly and transparently, by means of public reports and its website and through any other channel it considers adequate for this purpose.*

***Policy approved by the Board of Directors on September 17, 2015***