



# Corporate Policy on Corporate Social Responsibility

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# Corporate Policy on Corporate Social Responsibility

The Board of Directors of CaixaBank, S.A. ("CaixaBank" or the "Bank") has released this policy to underscore the Bank's commitment to pursuing an efficient and responsible business model that focuses on social aspects.

This Policy on Corporate Social Responsibility sets out the strategy and core principles of the Bank when it comes to corporate responsibility, in line with the CNMV Code of Good Governance of Listed Companies and in accordance with the Spanish Corporate Enterprises Act.

## 1. Objectives

The corporate Policy on Corporate Social Responsibility and the other instruments implemented by the Group must help:

- Attain the Group's strategic objectives through responsible and sustainable practices.
- Maximise the creation of shared value for stakeholders and create long-term relationships built on trust and transparency.
- Prevent, minimise and mitigate any negative impacts stemming from its business activities.
- Enhance CaixaBank's reputation.
- Extend responsible principles and practices across society so that we can all make progress on social and environmental concerns.

## 2. Scope of the Policy

Each and every person at the CaixaBank Group must base his or her actions on the principles of good faith, integrity and common sense.

This Policy will apply to all employees, executives and members of the governing bodies of CaixaBank.

This Policy will apply across the entire CaixaBank Group and will become a reference document for all Group companies. The governing and management bodies of all CaixaBank companies must act accordingly to implement the terms of this policy at their company, either by approving their own policy in accordance with the principles set out in this document or by adhering to the CaixaBank Group policy, duly adjusted to their specific circumstances and needs.

## 3. Mission, vision and values

CaixaBank bases its management on responsible action and economic efficiency, all geared towards the social and economic development of people and territory.

Its commitment to sustainable action aims to generate added value for both the Bank and its stakeholders and embraces the entire value chain, from the source of the funds and assets through to their eventual application and investment.



The **mission** of the CaixaBank Group is to improve our customers' financial well-being and help society prosper.



Its **vision** is to remain a leading and highly innovative financial group, offering the best service to customers and becoming a benchmark in socially responsible banking.

CaixaBank carries on its business activities and provides its services on the basis of its **corporate values** governing quality, trust and social commitment.

CaixaBank's corporate Policy on Corporate Social Responsibility is rooted in the Bank's mission, vision and values. Through this policy, CaixaBank will steer its business on the basis of the following **principles**:

- Integral, responsible and sustainable action.
- Unrivalled quality of service.
- Economic efficiency.
- Adopting a long-term outlook when making decisions.
- Permanent innovation to aid with the sustainable development of communities wherever possible.

## 4. Procedural aspects

### 4.1 Principles of action and support instruments

CaixaBank shall carry on its business in strict compliance with applicable law and regulations and in accordance with the highest standards of professional conduct and ethics.

These include the **principles of action** enshrined in CaixaBank's *Code of Business Conduct and Ethics*, compliance with the law and prevailing regulations, respect, integrity, transparency, excellence, professionalism, confidentiality and social responsibility.



This corporate Policy on Corporate Social Responsibility embodies these principles of action, along with any other policies, standards or values adopted by the Group that govern professional relationships within the Bank and external relations with customers, shareholders and other stakeholders, in relation to all areas in which the Bank operates.

This Policy should be read in conjunction with CaixaBank's *Code of Business Conduct and Ethics* and by other specific policies, rules and commitments also relating to the aspects governed by this Policy. It should also be read in conjunction with the Bank's adherence to international initiatives in the realm of corporate social responsibility, as explained on the corporate website, notably the Global Compact, the Principles for Responsible Investment of the United Nations and the Principles for Responsible Banking of the United Nations Environment Programme Finance Initiative (UNEP FI).

## 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 earn their trust.

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

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

In particular, CaixaBank forbids any kind of discrimination, harassment, abuse or inappropriate treatment based on gender, race, colour, nationality, creed, religion, political opinion, affiliation, age, sexual orientation, status, disability or any other circumstance protected by law, not only in relation to employees, executives and members of the governing body, but also shareholders, existing and potential customers, suppliers and any other person who interacts with the Bank.

- **Compliance at all times with prevailing legislation** across all territories in which CaixaBank operates, fostering free market practices and regularly reviewing and improving good governance practices.
- **Rooting the tax policy** in the principles of accountability, caution and transparency, in accordance with applicable law and regulations.
- Adopting all necessary measures to **prevent CaixaBank products and services from being used for unlawful or illicit ends** (such as the financing of terrorism, money laundering or financial crime), conducting regular reviews, actively collaborating with regulatory bodies and security forces and reporting any suspicious activities. The Bank therefore champions responsible conduct among all people that make up the organisation, all of whom must respect and apply the *Anti-corruption Policy* and all other codes of conduct and standards in effect at CaixaBank.

In particular, all CaixaBank employees must collaborate discreetly and actively in helping to prevent money laundering and will receive training on their responsibilities in this regard.

- **Ensuring prudent and global management of all risks** (financial and non-financial), based on the Group's General Principles of Risk Management and Risk Appetite Framework. Having

adequate mechanisms in place to monitor the risks (financial and non-financial) included on the Corporate Risk Map.

- Ensuring that employees are able to use the **internal whistle-blowing channel** to raise concerns or report breaches of the codes of conduct.
- Fostering the inclusion of social and environmental concerns when making business decisions and in the risk management process.
- **Promoting transparency when reporting information** to CaixaBank stakeholders, establishing sufficient communication channels, disseminating the information clearly and concisely and adopting **responsible communication practices** at all times to prevent any misinformation and protect the integrity of the information and the Bank's good name.

## 4.3 Commitments in relation to the main stakeholders



### Customers

CaixaBank places its customers at the centre of its business and therefore works hard to create value for them and the communities in which it operates.

CaixaBank shall act honestly and responsibly in all its relations with customers, adopting a long-term customer-oriented vision at all times as it seeks to earn their trust.

With this objective in mind, CaixaBank shall:

- Offer **products tailored to the customer's needs**, with all marketing policies to be reviewed by specific committees.

Therefore, the marketing and sale of Bank products shall be based on a **responsible marketing policy** that complies with all applicable law and regulations, including MiFID. CaixaBank has also set up a Transparency Committee, whose members come from the main departments involved in developing and marketing products. This body decides on all aspects relating to transparency when designing and marketing financial instruments, banking products, savings insurance and investment products. It also has a Product Committee, which is responsible for approving any new product or service that the Bank may design and/or market, after scrutinising its characteristics and associated risks and confirming that it complies with applicable law and regulations on transparency and consumer protection.

- Seek to **maximise quality** of service by regularly monitoring the customer experience and gauging employee opinions through surveys, group dynamics and other channels. The aim here is to acquire a full picture of their views and expectations in order make further improvements to quality of service and the customer experience.
- Foster **active dialogue** with customers and offer them agile channels so they can raise queries and lodge claims and receive a swift and personalised response to the matter raised.
- **Communicate transparently and clearly** so that customers can make informed decisions, in accordance with the Commercial Communications Policy and other codes of conduct the Bank has chosen to embrace. This attitude is reflected, amongst other aspects, in CaixaBank's voluntary adherence to the Spanish Association for Commercial Self-Regulation (AUTOCONTROL), which champions good advertising practices.
- Protect the **confidentiality** of customer data.

- Uphold the highest standards of security and therefore promote practices that maximise the **safety and security** of its products and services.
- Ensure that CaixaBank products and services are **accessible** to as many people as possible, while promoting financial inclusion.
- Maintain a **strong territorial presence** and remain fully invested in the community..



## Shareholders and investors

CaixaBank works hard to repay the trust that shareholders and investors place in the Bank and to meet their needs and expectations wherever possible. In doing so, it seeks to offer tools and channels to improve their engagement and communication with the Bank and to let them exercise their rights as its owners.

To achieve this, CaixaBank shall:

- Guarantee **equal treatment**, enabling shareholders to exercise their rights within the framework of the Bank's corporate interests.
- Offer **clear, complete and truthful** information to markets and shareholders, encompassing both financial and non-financial aspects of the business, and promote their informed involvement at general meetings of shareholders.
- Offer **personalised** service and support through the shareholder information service and institutional investor and analyst information service, in accordance with the *Policy on Information, Communication and Contact with Shareholders, Institutional Investors and Proxy Advisors*.
- Roll out **training and information** initiatives for shareholders.
- Comply with the Internal protocol governing relations between "*la Caixa*" Banking Foundation, *CriteriaCaixa* and *CaixaBank*, which is available on the Bank's corporate website.



## Employees

CaixaBank's employees are its main asset and the success of the Bank's efforts to become more sustainable and socially and economically efficient is ultimately down to them.

Under this premise, CaixaBank shall:

- Respect the **labour rights** enshrined in both domestic and international laws (the eight fundamental Conventions of the International Labour Organization).
- Base its people management policy **on respect for diversity, equal opportunities and non-discrimination on the grounds of gender, age, disability or any other circumstance**, while promoting diversity, social inclusion and ensuring a decent and professional working environment.
- **Make equal treatment and opportunities for all people part of the business**, as set out in the Equality Plan and as shown by the Bank's adherence to initiatives such as the Women's Empowerment Principles of the United Nations.
- Champion **job stability**, a proper **work-life balance** and the well-being of employees when at work, in accordance with the Protocol on Equality and Work-Life Balance.
- **Manage the Bank's talent** in order to drive the **professional development** of its employees:
  - By making performance-based criteria part of its internal selection processes.
  - Seeking to attract and retain talent.
  - Through a **training plan** purpose-built for different groups of trainee.
- Apply the Safety, Health and Well-being Policy to generate value for people and improve the well-being of employees by providing a **healthy and sustainable working environment**.
- Promote internal **dialogue** and communication, and measure employee satisfaction through regular climate surveys.



## Society

CaixaBank's management model reflects its commitment to the social and economic development of the territory.

Based on this commitment, CaixaBank works to:

- Promote **financial inclusion**, providing access to the financial markets for people and segments of society that are typically excluded from these services due to their particular:
  - MicroBank, its social bank, is the only Spanish entity to specialise in microfinance.
  - CaixaBank rolls out training initiatives to improve financial literacy among the public.
- Raise awareness among customers and employees and get them involved in the programmes and initiatives of its main shareholder, **"la Caixa" Banking Foundation** so that they have a greater positive impact.
- Promote the Volunteering programme of "la Caixa" and raise awareness of its volunteering activities across the community.
- **Take part in initiatives and collaborate with regulators, organisations and entities** that champion responsible practices among customers and the communities in which CaixaBank is present.





## Environment

CaixaBank has made environmental protection and respect an integral part of its business, projects, products and services, pledging to protect the environment and comply at all times with applicable environmental law and regulations.

Aside from this commitment, as enshrined in the Bank's Statement on Climate Change and Principles of Environmental and Energy Management, CaixaBank has pledged to:

- Create products and services aligned with a **sustainable development model**.
- Finance projects that help improve **energy efficiency** and become more environmentally sustainable in the long run.
- **Integrate environmental and social risks** when analysing the risk of financing customers and investment projects.
- Comply with the most stringent **environmental standards** in the countries in which it operates.
- Work to improve internal processes and operations to enable more efficient management of resources and **minimise the environmental impact**.
- Promote a responsible attitude among employees, customers and society in general.
- Take part in international initiatives, such as the **Equator Principles**, the **United Nations Environment Programme Finance Initiative (UNEP FI)** or the **CDP**, to make further progress towards these goals.



## Suppliers

CaixaBank seeks to ensure the responsible management of its supply chain, as set out in its *Procurement Principles* and *Supplier Code of Conduct*.

CaixaBank has assumed the following commitments along these lines:

- Ensuring maximum **transparency during purchasing and procurement processes**, which are channelled through tender processes if considered advisable, and inviting offers.
- Working only with those suppliers that **respect fundamental human and labour rights** when carrying on their business.
- **Promoting responsible practices** amongst suppliers and their supply chain, through contractual clauses and the dissemination of sustainable initiatives.
- Auditing the labour, social and environmental practices of suppliers when deemed necessary and acting accordingly when the findings prove unsatisfactory.

## 4.4 Channels for stakeholder communication, participation and dialogue

CaixaBank strives to make its stakeholders aware of the various **channels of communication**, participation and dialogue at their disposal.

These service channels include: customer and shareholder freephone numbers and electronic mailboxes; Customer and Shareholder Information Offices; online platforms to enable customer and employee engagement; conferences and events; regular opinion surveys; press releases and other active dialogue channels with the media.

## 5. Monitoring and supervision of corporate responsibility practices

In accordance with applicable law and CaixaBank's own internal rules and regulations, the Board of Directors is responsible for approving the **Corporate Social Responsibility Policy** and will adopt the necessary measures to implement and oversee the development and application of this Policy. It will therefore receive annual reports in relation to the application of the policy and the results obtained.

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

On the subject of risk supervision, CaixaBank's **Risks Committee** is entrusted with overseeing and scrutinising the processes of reporting and controlling the Group's risks, including non-financial risks.

To ensure good decision-making, CaixaBank has also set up a **Corporate Responsibility and Reputation Committee** to shape the policy and strategic lines of reputation management and to lay these before the relevant governing bodies and the Management Committee. The committee also establishes management and control measures relating to corporate responsibility, selects and reviews key performance indicators and reviews and approves corporate responsibility programmes.

The **Executive Division for Communication, Institutional Relations, Brand and CSR** is responsible, among other duties, for implementing the corporate responsibility strategy and rolling out the corresponding action plans agreed upon by the governing bodies. It relies on a number of tools when carrying out these duties, notably the Reputation Scorecard, which allows it to manage and monitor strategy and action plans in the realm of corporate social responsibility. Meanwhile, the reputational risks map, integrated within the Corporate Risk Map, allows the Bank to manage corporate social responsibility and appraise and manage the main risks to the Bank's reputation.

*CaixaBank is committed to providing sufficient information on the application and results of this Policy, and on any possible changes, by releasing clear and transparent information in public reports and by including that information on its website and any other channel it considers appropriate.*

*Policy reviewed and approved by the Board of Directors on  
30 October 2019.*