



Procurement Principles

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1. Introduction

1.1 Scope

The Corporate Procurement Policy of CaixaBank, S.A. (hereinafter, "CaixaBank" or "the Company") constitutes the general framework in which activities related to Procurement management are carried out, and in which the supplier relationship and contracting model is defined.

The Procurement Policy of the CaixaBank Group (hereinafter, "the Group") is structured around general principles of action whose purpose is to foster commercial relations based on compliance with current laws and regulations, respect, integrity, transparency, excellence and professionalism, confidentiality and social responsibility, as well as facilitating collaboration with suppliers that share CaixaBank's commitments and values.

1.2 Purpose

At CaixaBank, we are constantly striving to build and improve our relationship with suppliers. Within its objective of creating value for the Group, the corporate procurement function assumes the mission of aligning procurement objectives with the business strategy, and of providing, in a responsible and sustainable manner, the goods and services that it needs on time, at the quantity and quality required, at the lowest total cost, and with the minimum risk for our business under homogeneous operating criteria for the companies of the CaixaBank Group.

Procurement Principles have been established by CaixaBank as a balanced collaboration framework between CaixaBank and its suppliers that promotes stable commercial relationships, consistent with our values.



2. Scope of Application

Procurement Principles are corporate in nature, and are applicable to CaixaBank's suppliers and CaixaBank Group companies with which it shares a procurement management model, including its employees, managers and members of CaixaBank's governing bodies involved at any time in the processes of evaluation, negotiation or contracting of goods and services from suppliers.

Notwithstanding the foregoing, only CaixaBank, the Group's parent company, will be referenced in this document in order to make it easier to understand the Procurement Principles.

These general principles of action are intended to foster business relationships based on compliance with current laws and regulations, respect, integrity, transparency, professionalism, confidentiality and social responsibility, as well as facilitating collaboration with suppliers who share the commitments and values of CaixaBank.

The principles contained herein will be adapted to and be consistent with the principle of proportionality, so that, in their application, the size, internal organization, nature, scale and complexity of the activities carried out by the suppliers who provide their services will be taken into account.



3. General Principles applicable to Procurement Management

We promote compliance with the following principles in commercial relationships with suppliers:

Professionalism and continuous improvement

- > Acting in accordance with national and international procurement standards, which are guided by best business practices, unify work procedures and establish performance criteria for excellent management. Compliance with these standards adds value to the entity and guarantees that procurement respects environmental, ethical and social aspects, ensuring innovation and continuous improvement.

Planning and efficiency

- > Planning the procurement activity by promoting proactivity as the core of its action to ensure the achievement of optimal results.
- > Seeking efficiency in the contracting of goods and services, adapting to the principles of necessity and suitability in spending, taking into account quality, sustainability and innovation, as well as possible risks.
- > Optimizing processes and minimizing the risks that arise from procurement decisions through the standardization and centralization of the procurement function and the establishment of a single procurement procedure for Group companies.

Ethics, integrity and transparency

- > Guaranteeing transparency, independence and the management of conflicts of interest in the selection of suppliers, with mechanisms that standardize and automate procurement processes and procedures that regulate decision-making in a step-wise manner with the knowledge of all levels involved in the system of capabilities and delegation. Conflict management will be regulated by the Conflicts of Interest Policy.
- > Acting ethically and responsibly in accordance with that indicated in the CaixaBank Code of Ethics, as well as in the procurement regulations.
- > Ensuring compliance with current legislation in all areas of action. The general contracting conditions will not include clauses that are contrary to good faith and a fair balance between the rights and obligations of CaixaBank and the supplier.

Equal opportunities

- > Seeking the participation of suppliers for the same contracting process in order to ensure a process in accordance with the principle of fair competition that guarantees the best possible option for CaixaBank.
- > Promoting business diversification among different local, national and international suppliers, to contribute to a balanced distribution of wealth and equal opportunities.
- > Guaranteeing objectivity in decisions. Contracting will be carried out guaranteeing the application of objective, transparent, sustainable, ethical, weighted, and auditable criteria.

Dialogue, cooperation and sustainability

- > Promoting and maintaining a close, ongoing dialogue and a relationship of trust with our suppliers.
- > Making communication channels available to suppliers in order to address their queries, complaints and suggestions.
- > Carrying out dissemination, awareness-raising and training work with suppliers to guarantee knowledge of CaixaBank's policies and principles and encourage commitment, including ESG criteria in applicable procurement processes.

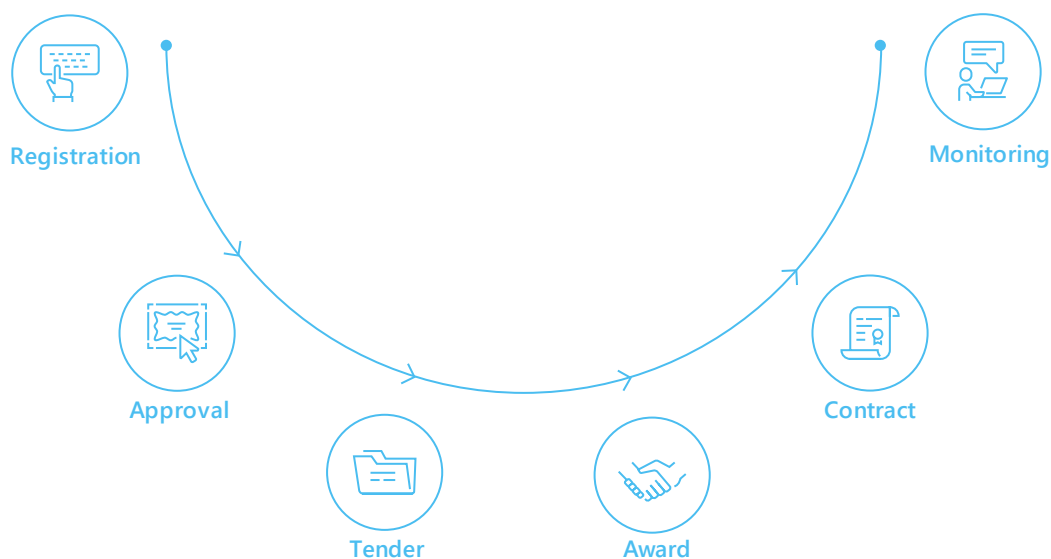
Commitment and promotion

- > Evaluating the performance of suppliers, both with regard to their activity as a supplier of goods and services, as well as their ethical, social and environmental commitment.
- > Avoiding contracting with those suppliers known to be involved in any legal, tax, labor or human rights violations or any form of corruption.
- > Promoting the hiring of suppliers who guarantee respect for fundamental human and labor rights in their activity, apply the best social and environmental practices and good corporate governance, and work to extend them to the entire value chain.
- > Monitoring environmental and social risks, especially in the area of human rights, to verify compliance with commitments in terms of responsible management.



4. Our Procurement Process

Our procurement model includes the registration and approval of suppliers, negotiation, award, notification of the resolution of the procurement process to the participating suppliers, formalization of the contract with the successful supplier, and monitoring.



4.1 Registration and approval

CaixaBank has a supplier approval procedure. This process is carried out by enrollment and registration of the supplier in the CaixaBank Supplier Portal in order to guarantee the transparency and traceability of the process.

CaixaBank expects those suppliers with which it maintains a contractual relationship to respect the Supplier Code of Conduct. This Code defines the guidelines of conduct that are to be followed by companies that work as suppliers in relation to compliance with current legislation, ethical behavior and measures against bribery and corruption, safety and the environment, and confidentiality.

This Code of Conduct is available to suppliers on the Supplier Portal and on the CaixaBank corporate website.

4.2 Negotiation, award and formalization of the contract

CaixaBank will notify potential candidate suppliers of the technical and commercial specifications required for the provision of services or the purchase of goods.

In the case of outsourcing, CaixaBank will indicate the measures to be taken into account following the risk analysis carried out by the company.

Once the process of reception, assessment, approval of the risks associated with the service (where applicable) and awarding of offers has been completed, the contract will be signed by both parties. Any commercial relationship with our suppliers will be covered by the corresponding contract by ensuring that the negotiated conditions are duly included.

4.3 Monitoring

CaixaBank may audit and carry out performance evaluations of the supplier to ensure that the processes, products and services supplied comply with the requirements, determining, where appropriate, the controls to be applied.

Failure to comply with the content of the Supplier Code of Conduct may be grounds for the early termination of contractual relations with any supplier. This aspect will be included in the corresponding contract with the supplier.