



# CaixaBank Code of Conduct

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## Corporate message

A genuine code of principles and values and a strong corporate culture are fundamental pillars in the sustainability of any project.

This code of values must permeate all levels of the organisation, starting with the board of directors, because in this area, as in any other area of management, leadership can only be legitimised by example.

And this is because what really makes the difference is the fact of having the code of values assimilated in your DNA. Being truly convinced that it is the only way forward.

Being convinced that there are no shortcuts, and that no objective or result is above the principles.

Principles that should guide us in our relations with our teams, with our customers, with our suppliers and with the society we serve.

Our aim at CaixaBank is to be close to people for everything that matters, supporting society, businesses and families.

And we want to do this with a different way of banking, one that is very inclusive and very close to society. A way of doing things that stems from our founding roots and is based on our corporate values of quality, trust and social commitment.

This Code of Ethics sets out the principles that govern the actions of all the people who make up the CaixaBank Group. It is our highest internal standard and, as such, must be complied with by all of us who form part of the CaixaBank team.

We count on the support and commitment of all the people who form part of the CaixaBank Group to comply with and enforce compliance with the provisions of this Code. In doing so, we will continue to fulfil our objective, supporting the progress of our society and being a benchmark in responsible banking.

José Ignacio Goirigolzarri

Chairman



# 1. Our identity and mission

Our business and social activity is founded on the corporate values of quality, trust and social commitment.



**Quality:** Best service to our customers by offering them excellent treatment and the products and services most suitable to their needs.



**Trust:** The result of integrity and professionalism. We cultivate it through empathy, dialogue, being open and accessible.



**Social Commitment:** Not only creating value for customers, shareholders and employees, but also contributing to the development of a fairer society with more equal opportunities. This shaped our beginnings, it is our very essence; what makes us stand out, brings us together and makes us unique.

At CaixaBank S.A, as credit institution and head of a group (hereinafter, the "CaixaBank Group" or "the Group"), which provides financial and investment services, we have the mission of fully meet the banking needs of our customers, through an appropriate and complete range of products and excellent service quality, while maintaining the commitment to add value to customers, shareholders, employees and the society as a whole.

At CaixaBank we are committed to carry out our activities in accordance with the most scrupulous legal and ethical requirements and the optimum standards of professional conduct, both in the interest of our customers as well as of the community and all those who that are directly related with us in any way.



With the approval of this Code, the Board of Directors of CaixaBank has set out the values and ethical principles that inspire its actions and that must govern the activities of CaixaBank and all employees, executives and members of its Governing Body. At CaixaBank we do not ignore, excuse or tolerate behaviour that goes against these values and principles.



## 2. Applies to all of us

1. This Code applies to all persons who are part of CaixaBank, that is, all the employees, executives and Governing Bodies. All of us are required to know and comply with the Code.
2. In our professional activity we must respect the values, in our internal professional relations with the Entity and in our external relations with shareholders, customers, suppliers and society in general, we must respect the values, principles and rules contained in this Code.
3. This Code has a corporate scope, consequently it applies to all CaixaBank Group companies. The Governing Bodies of the mentioned companies shall adopt the appropriate decisions for the purpose of integrating the provisions in this Code, either by approving their own Code in accordance with the principles set out in this document or by adhering to the CaixaBank's Code.



4. Violations of this Code will be punishable in accordance with the stipulations of the Workers' statute, the applicable Collective agreement and other applicable legislation.
5. The values and principles set out in this Code are communicated to the CaixaBank Group's suppliers through the Supplier code of conduct, which spread and promote the values and principles that will govern the activities of our suppliers and to third parties whose contractual relationship requires compliance.

6. The Code is available in the CaixaBank's Corporate website and the Compliance and Sustainability internal portals.

*Appendix 1 – Decision-making guide* contains a questionnaire to help taking decisions in line with what is set out in this Code.

## 3. Action principles

Compliance with the law and regulations in force at the time, respect, integrity, transparency, excellence, professionalism, confidentiality and social responsibility are our core principles of conduct.

CaixaBank's internal policies and procedures are aligned with the values and principles set out in this Code.

### 3.1 Compliance with effective laws and legislation

Respect for the laws and other regulations in force at the time is one of our principles that guides our actions.

#### I. Respect for the law as a basic rule

1. CaixaBank has the commitment of complying with the laws and legislation as well as all internal policies and rules. In order to facilitate knowledge of current legislation and internal regulations and thereby ensure compliance with them, at CaixaBank we provide regular training on matters that have impact on the development of our activity.
2. At CaixaBank we strictly comply with the regulations that develop the Crime prevention model to prevent, detect, avoid and, where applicable, report possibly illegal acts. At CaixaBank we categorically reject any illegal or criminal conduct that supposes a breach of internal regulations, under the premise of operating in favour of the Company regardless of the possible financial benefit generated.
3. In the performance of our duties, we must act legally, ethically and professionally, in compliance with all laws, regulations and standards legally required. Our principles of conduct and our reputation cannot be compromised.
4. We must all cooperate with any investigation or audit, internal or external, carried out by or at CaixaBank.

#### II. Money laundering and the financing of terrorism

1. Refusing money laundering and financing of terrorism is a priority for us. In accordance with exiting legislation, we have internal policies and rules to prevent money laundering and the financing of terrorism, including compliance with international financial sanctions programmes, that are mandatory to comply with.
2. In case of any doubt arise in the day-to-day activities in this respect, we should contact our immediately supervisors or the responsible in anti-money laundering at the Company.

### III. Prevention, health and welfare

1. The prevention, health and welfare of employees is a fundamental priority for CaixaBank. For this reason, in addition to scrupulously complying with all applicable regulations, we have an internal portal on the CaixaBank intranet where all employees can consult internal regulations, policies and different information on prevention, health and wellbeing. Furthermore, we understand that caring for our wellbeing is not simply a legal or ethical obligation, but that it is about building a culture of care and commitment in our organisation.
2. At CaixaBank we implement measures and policies that promote a safe and healthy working environment. In this regard, we have developed our occupational risk prevention policy and manual. In addition, we offer preventive information on health and wellbeing at work on our intranet, as well as instructions and protocols for action in the event of any incident that may occur.
3. CaixaBank also values emotional and mental health and safety. We offer programmes and benefits that help maintain a work-life balance and provide a respectful and collaborative work environment that fosters open communication and mutual support.

### IV. Judicial or administrative proceedings

1. We are required to actively and diligently collaborate with the Company according to the guidelines received from Legal Department to defend the interests of CaixaBank before any legal, arbitration or administrative authority.
2. Notably, it will be mandatory to appear before any legal, administrative and/or arbitration authorities when we receive a summons from mentioned authorities, either at a personal / business address or requested by the Legal Advisory Department. Likewise, we must collaborate with the Company when we are requested to prepare and/or answer an appearance or statement in any proceedings.
3. If we receive, either at our personal or professional address, a summons, resolution or notification from a judicial, administrative or arbitration body for events related to the performance of our duties at CaixaBank, we must notify this through the circuits established in the internal regulations, always informing a hierarchical superior.



## 3.2 Respect

We respect people, the cultures and their diversity, the institutions, the pluralism of the territories where we operate and the environment.

### I. Respect for people

1. At CaixaBank we assume, as core value of conduct, the respect for people and their dignity. We endorse the Universal Declaration of Human Rights adopted by the United Nations that includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights. We also assume and respect the International Labour Organisation (ILO) on Fundamental Principles and Rights at Work and the Charter of Fundamental Rights of the European Union.
2. We must respect any person working in the Entity and, in general, anyone who interacts with the Company.
3. At CaixaBank we interact with the persons working in the Entity and, in general, with anybody interacting with the Company in a fair way, regardless of their sexual identity, expression of gender, sexual orientation, ethnic origin, nationality, beliefs, religion, political opinion, affiliation, age, marital status, disability, and other situations protected by the law.
4. We reject any type of discrimination, harassment, intimidation, abuse, as well as any conduct that may be considered offensive, improper or inappropriate. At CaixaBank we reject any sexual proposal or suggestion and other actions that may offend the dignity of the individual.
5. We promote team leaders to encourage work-life balance among the people who work at the Company, as well as equal opportunities among male and female employees based on meritocracy and in accordance with prevailing legislation and agreements signed with workers' representatives and other institutions that support diversity, equal opportunities, the welfare and work-life balance.

### II. Respect for cultures and their diversity

At CaixaBank we respect the local cultures of the communities and countries in which we do business, as well as their diversity, always under the guidance of respect for human rights, and we take an active and committed approach to contributing to the socioeconomic progress and development of these areas.

### III. Respect for institutions

We interact with the institutions, including the Public administrations, according to current legislation, with respect to the institution and collaborating in an appropriate way with them.

### IV. Respect for political pluralism

1. We respect the political pluralism of the societies where we do business, and as a result, all our activity will be governed by the principle of political neutrality.
2. Any connection, membership or collaboration with political parties or with any other type of entities, institutions or associations with public purposes shall be clearly carried out in a personal way, avoiding involving or compromising the name, corporate image or legitimate interests of CaixaBank.

## V. Respect for the environment

We work to limit the environmental impact from our activity and our operations. We carry out actions aimed at increasing the positive impact of our business and promoting a sustainable future for society and the environment.



We consider the direct and indirect impacts over the environment as a result of our actions and we comply with the established criteria set out in our internal environmental and climate change policies.

## 3.3 Integrity

By conducting ourselves with integrity, we generate trust, a core value for CaixaBank.



### General principles

1. The trust of shareholders, customers and, in general, of all individuals within CaixaBank's areas of operations relies on our business activity. This trust can only exist if our integrity is beyond of any doubt.
2. At CaixaBank we believe in free, honest and fair competition. We have internal regulations on competition law, mainly aimed at ensuring compliance with competition standards.
3. In the course of our professional activity we may find ourselves faced with a dilemma about which we have to make a decision. In these cases, we must apply common sense and ask ourselves the questions set out in Appendix 1 - Decision-making guide. In any case, we have the **CaixaBank's Whistleblowing Channel** at our disposal.



### Anticorruption

1. At CaixaBank we actively rejects any action or omission directly or indirectly related to acts of corruption in all the markets in which we operate. To this end, we have a Corporate Anticorruption Policy, which is an essential tool to prevent that CaixaBank, the Group companies or their external collaborators, directly or through intermediaries, carry out conducts that may be contrary to the law or to CaixaBank's basic principles of action.

2. The standards of conduct set out in the Corporate Anticorruption Policy include our corporate criteria on the acceptance and granting of gifts, travel and hospitality expenses.



## Conflicts of interest

1. At CaixaBank, we respect the private life of our employees without interfering in their activities or conduct outside the scope of their work at the Bank, provided that such activities or conduct do not affect our good name or our legitimate interests.
2. Our reputation depends, among other things, on the perception we generate in society, through our activities in all areas of activity, and on our conduct. In the exercise of private activities, we will not involve or use the name or image of CaixaBank, especially if they may have a public repercussion through the media or social networks. We reject any practice that contravenes our values and principles in any situation.
3. We are required to work in the interest of CaixaBank and it is prohibited to take personal advantages from our professional activity or from the use of CaixaBank's assets and information, and from benefiting third parties using the mentioned assets and information. Employees must never put their personal interests before those of CaixaBank, its customers or its shareholders.
4. We must avoid situations related to conflict of interests, including those derived from kinship or similar relationships. In such situations, the person affected by the conflict of interest must refrain from becoming involved or participating in the related negotiation or transaction. As a result we must refrain from participating in any CaixaBank transaction in which they or any related person or company also has an interest.
5. We must not use confidential and privileged information available to us as a result of our professional activity for our own benefit or for the benefit of a third party.
6. We have mandatory internal regulations on the prevention of conflicts of interest in different areas, which we must observe by their nature and as development of the general principles contained in this section. These regulations provide a global framework, general principles and action procedures for dealing with conflicts of interest, the maximum expression of which is the CaixaBank Group Corporate Policy on Conflicts of Interest, which, among other things, includes the obligation for employees to report certain activities which, due to their nature, may entail a conflict of interest, internal rules of conduct in the securities market and rules for granting risk concessions to persons related to the Entity.



## Internal Code of Conduct

1. The Internal code of conduct applies to all persons working in the securities market. Those who work in areas related to the securities markets and/or who have regular access to Inside Information have additional obligations regarding their personal operations.
2. If we operate in the securities market, we must not carry out transactions in financial instruments about which we have Inside Information or recommend the acquisition or disposal of such instruments to third parties. Likewise, we must not engage in transactions involving market manipulation of financial instruments, transmitting false or misleading signals or impacting the price or volume of financial instruments.

In the event of having access to privileged information, this must be reported to the Compliance Department through the Consultation Channel available on the CaixaBank intranet.

3. If we detect suspicious customer transactions involving the use or attempted use of inside information and/or market manipulation or attempted market manipulation, we must also notify the Compliance Department using the reporting form available on the Compliance portal on the CaixaBank intranet.



## Protection of CaixaBank's goods

1. We must protect the Company's goods, which may only be used for CaixaBank's own legitimate purposes.
2. The regulations concerning use of resources must be complied, as well as the computer security regulations and intellectual property rights for the programmes used at the Company, all in accordance with the internal regulations in this regard and, in particular, with the provisions of the Telematic Code of Conduct. Only software programs authorised by CaixaBank may be used on the Company's terminals.
3. All goods created by CaixaBank within the professional relation of provision of services, regardless of whether Company resources were used to create them, belongs to CaixaBank, even after the professional relation with the Company ceases.

## 3.4 Transparency

We are transparent in the development of our activity. With the aim of ensuring that our customers are properly informed. Our main policies and relevant information on our activity are published on our corporate website.



### Transparency to society

At CaixaBank we are committed to honesty, transparency and compliance with the regulations applicable to society as a fundamental value of our actions.



### Transparency to customers and shareholders

1. At CaixaBank we provide our customers with appropriate explanations of the characteristics of the products and services we offer in a precise, clear and truthful manner so that they can freely choose the product or service that best suits their needs and interests, and ensure that they are aware of and understand the risks associated with or inherent to these products and services.
2. At all stages of the marketing of products and services, the customer's interests and needs always prevail over our own, acting with honesty and transparency in the information provided. It is important to guarantee an adequate level of protection through the implementation of transparency measures, with the support of information material and the provision of the necessary pre-contractual and contractual documentation in each case, with the aim of carrying out a correct marketing process adapted to the needs of the client and guaranteeing a lasting relationship of trust.
3. At CaixaBank we promote advertising that is clear, sufficient, balanced, objective and not misleading, in simple, easy-to-understand language, without omitting necessary information, without creating false expectations, without misleading about the characteristics of the product or service offered, so that the recipient can make an informed decision about the products and services advertised.
4. At CaixaBank, we design and adapt the range of products and services we offer to the interests, objectives and characteristics of our customers in order to meet their real needs.
5. Everyone must at all times have the necessary up-to-date knowledge and skills in terms of training on the products or services we market. To this end, we must take the necessary mandatory and ongoing regulatory training courses, such as, but not limited to, training on the Real Estate Credit Contracts Law (LCCI), the Markets in Financial Instruments Directive (MiFID) and the Insurance Distribution Directive (IDD).
6. We have a Customer Service department responsible for dealing with and resolving customer complaints, which is independent from the commercial and operational areas of CaixaBank. Its resolutions are based on customer protection regulations for financial services and on the values and principles set out in this Code. One of this service's objectives will be to avoid legal disputes

with customers through applying general strict adherence by supervisors with the guides from supervisors.

7. We shall provide our shareholders and institutional investors with all relevant financial and corporate information in accordance with current regulations and in compliance with CaixaBank's communication and contact policy for shareholders, institutional investors and advisors with a vote.



## Transparency in its relationship with suppliers

1. We contract suppliers based on free competition and disregarding any relationship or interference outside our interests. Without prejudice to economic and technical conditions, collaborative relationships with suppliers should create value for both parties. Goods must be purchased, and services engaged objectively and transparently, avoiding situations that could affect the objectiveness of the people involved. Therefore, there should be no family, economic or friendship ties with suppliers.
2. We only engage suppliers who operate in accordance with best practice in ethical, social and environmental issues, as well as good corporate governance. In turn, we demand to our suppliers a strict respect to fundamental human and labour rights and encourage them to include in their practices behaviours aligned with our values and transmit them in their value chain.
3. The values and principles set out in this Code are transferred to CaixaBank Group suppliers through the Supplier code of conduct.



## Transparency in its relationship with the media

When we act as CaixaBank representatives in public ceremonies, interviews, conferences, courses or any other circumstance where it may be understood that our opinions, statements or the information provided are attributable to CaixaBank, or if our professional activity or performance, even if only occasional, has repercussions for the media, we have to consult our supervisor and, where appropriate, the Communication and Institutional Relations Department, which is responsible for media relations and managing CaixaBank's corporate profiles on social networks.

# 3.5 Excellence and Professionalism

We work rigorously and effectively. Excellence is one of CaixaBank's core values. Therefore, customer and shareholder satisfaction guide our professional conduct.

## I. The service to our customers

1. At CaixaBank we place our customers at the very heart of its business. As part of this commitment, we create value for our customers and for the communities in which we operate.
2. In all customer relations, we are committed to act honestly, in a responsible and professionally manner.
3. We carry out in-depth studies of our products and services before offering them to customers.

## II. Commitment to our shareholders and investors

The relationship that we maintain with our shareholders and investors is governed by criteria of transparency, proximity and active listening. At CaixaBank we adapt the highest standards and best practices in corporate governance, reporting on its compliance with the recommendations for good governance contained in the Good governance code of listed companies.

## III. Professionalism and teamwork

1. Our greatest asset is the people that integrate CaixaBank and the values and principles which motivate them. We respect and promote diversity, valuing the skills and contributions of each person.
2. As a team, we are guided by a sense of commitment, dedication and a drive for excellence.

## 3.6 Confidentiality

We preserve the confidentiality of the information that our shareholders and customers entrust in us.

1. Confidentiality of information regarding our customers, employees, members of Governing Bodies and management, suppliers and shareholders is the cornerstone of the trust underlying our entire business.
2. Current regulations and internal rules on personal data protection, confidentiality and privacy must be respected.
3. CaixaBank protects the personal information of its customers, shareholders, employees, members of its Governing Bodies and any natural or legal person related to the Company. CaixaBank also requires third-party suppliers or companies with which it has dealings to safeguard the confidentiality of the information they may obtain through their contractual relations with Caixabank.
4. Covered parties will only use information received from shareholders, customers, suppliers and employees for the purpose for which it was disclosed, in accordance with applicable legislation. Access to information that is not strictly required to carry out a specific job is prohibited. Before sending information to third parties, the people involved should ensure that they are authorised to do so and that there is a legitimate reason for this. Even where authorisation is given, the information disclosed must be limited to the absolute minimum required under the circumstances. When in doubt, employees should consult their supervisor or, depending on their identity, the Department of Information Security at CaixaBank or Data protection officer.

## 3.7 Social responsibility

We have a commitment to society in the development of our business.

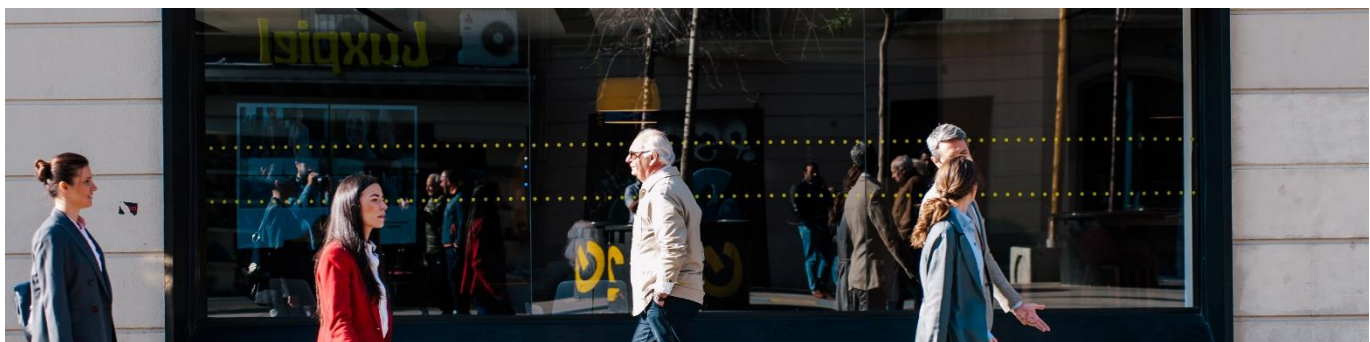
### I. Social and environmental responsibility

1. It is essential to integrate respect for human rights, equal opportunities and environmental sustainability into our objectives, in addition to financial gain. This maximises the shared value creation for interest groups and long-term relations are established based on trust and transparency.
2. We must manage its business, products and services within the framework of its commitment to respect the environment and people. In a coherent way, we shall support those initiatives and projects that are most respectful of the environment and which contribute to preventing, mitigating and responding to climate change. CaixaBank shall contribute to the transition towards a carbon neutral, sustainable and inclusive economy.
3. We must be aligned with the **Sustainability Business Principles** and the **Human Rights Principles**.

### II. Adherence to national and international covenants

We adhere to the United Nations Global Compact Principles. Adherence to these principles constitutes a comprehensive commitment to social responsibility and sustainability, with the intention of developing such an attitude throughout our value chain.

We participate in numerous relevant national and international alliances and initiatives aimed at jointly advancing sustainability issues and exchanging best practices in this field.





## 4. Regulatory Compliance Function

The mission of the regulatory compliance function is to identify, assess, supervise and report the risks of sanctions or financial losses to which the entity is exposed as a result of non-compliance or defective compliance with laws, regulations, judicial or administrative requirements, codes of conduct or ethical standards and good practices relating to its sphere of activity. It also advises, informs and assists senior management and the governing bodies.

Its mission is articulated through the supervision of the risk of conduct and compliance derived from the processes and activities carried out; the fostering, boosting and promotion of corporate values and principles; and the promotion of a culture of control and compliance with the laws and regulations in force that allows and favours their integration into the management of the entire organisation.

CaixaBank's Regulatory Compliance Department prepares, evaluates and encourages the implementation of the provisions of this Code of Ethics, promoting, through training, information and awareness-raising actions, a culture of compliance throughout the organisation and resolving doubts about its interpretation through the internal channels provided.



## 5. Whistleblowing Channel

To facilitate compliance with this Code and other internal regulations, we have a confidential Whistleblowing Channel where irregularities that could represent breaches shall be reported.

Disclosures are managed and resolved by using a rigorous, transparent and objective procedure, safeguarding in all cases the confidentiality of the persons concerned and involved in the facts and conduct reported.

We do not tolerate any reprisal against those who in good faith report events or situations that may fall under prohibited conduct as set out in this Code of ethics. Along these lines, we shall continually work to align communication channels with best practices.

The disclosures communicated by customers will be managed by CaixaBank's customer service channels.

The Channel is accessible through the **Compliance site on the intranet, from the financial terminal, the Suppliers' Portal for this collective and via internet.**

## Appendix 1 – Guide for making decisions

If when performing your professional duties, we come across a **dilemma** about making decisions, we should use common sense and take into account the following:

- ✓ Is this decisión/action/omission **legal**?
- ✓ Would I feel **comfortable explaining** this decisión/action/omission to colleagues, superiors, relatives or friends?
- ✓ Have I considered **the interests of all** those who may be affected by this decision/action/omission?
- ✓ Am I sure I am doing the **right thing**?
- ✓ **If** my behaviour were made **public**, would it be deemed **appropriate and professional**?
- ✓ If the reply to any of the questions is **“NO”**, the question needs to be **rejected or checked**.

In any event, you may contact the *Reporting and Whistleblowing Channel*.