



Corporate Human Rights Policy at CaixaBank

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1. Introduction

The Board of Directors of CaixaBank, S.A. (“CaixaBank” or the “Bank”) has released this policy to underscore the Bank’s commitment to human rights in accordance with the highest international standards.

For CaixaBank, respect for human rights is an intrinsic part of its values and a minimum benchmark for the legitimacy of its business activities.

CaixaBank believes that the protection of human rights is largely down to governments but that companies are also responsible for championing and respecting these rights within the scope of their business activities.

Under this premise and in accordance with its *Code of Business Conduct and Ethics*, CaixaBank operates within a culture of respect for human rights and expects its employees, partners and other stakeholders directly associated with its operations, products and services to follow suit.

2. Scope and field of application

These principles of action in connection with human rights are intended to guide relations between CaixaBank and its employees, customers, shareholders, suppliers, commercial partners and the communities in which it carries on its business and other activities.

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. The governing and management bodies of all CaixaBank companies must therefore 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.

CaixaBank will promote and make this Policy known among all its stakeholders.



3. Commitments and principles of action

CaixaBank undertakes to respect all internationally recognised human rights enshrined in:

- The Core International Rights Treaties of the United Nations, which comprise:
 - > The Universal Declaration of Human Rights
 - > The International Covenant on Political and Civil Rights
 - > The International Covenant on Political and Civil Rights
- The ILO Declaration on Fundamental Principles and Rights at Work and its eight fundamental conventions.
- The EU Charter of Fundamental Rights.

It has also pledged to carry on its business in strict compliance with applicable law and regulations and in accordance with the highest standards of ethics and professional conduct, notably:

- The Guiding Principles on Business and Human Rights of the United Nations
- The OECD Guidelines for Multinational Enterprises
- The United Nations Global Compact
- The UN Womens' Empowerment Principles
- The Equator Principles
- The Principles for Responsible Investment of the United Nations, to which VidaCaixa and CaixaBank Asset Management have both adhered
- Principles of Responsible Banking of the United Nations Environment Programme Finance Initiative (UNEP FI)

CaixaBank endeavours to understand the impact of its activities on human rights and strives to avoid having any adverse negative impact where possible and to mitigate any impact that does arise.

The corporate Policy on Human Rights is aligned with other specific standards and policies, including the *Code of Business Conduct and Ethics*, the *Anti-corruption Policy* and the *Crime Prevention Policy*, as well as CaixaBank's adherence to international initiatives on the subject of corporate responsibility.

3.1 Our responsibility with employees

CaixaBank considers its relations with employees to be one of its main responsibilities when it comes to human rights.

The policy on the selection, management, promotion and development of human resources is built on respect for diversity, equal opportunities, meritocracy and non-discrimination on the grounds of gender, race, age, disability or any other circumstance.

Within this framework, CaixaBank has established internal policies and standards regarding:

- Promotion of diversity, inclusion and equal opportunities.

- Protection against harassment, discriminatory attitudes and abuse of authority.
- Freedom of expression and opinion.
- Freedom of association and collective bargaining.
- Occupational safety and the health and well-being of all employees.
- Anti-corruption.
- A minimum remuneration package to ensure the dignity of every person, in accordance with applicable labour law and regulations.
- Working hours that respect human rights and comply with applicable labour law and regulations.
- Promoting professional development and training.
- Rejection of forced labour and child labour.



CaixaBank implements these policies and standards by conducting training and awareness programs and establishing follow-up indicators.

To help ensure compliance with its codes of conduct, CaixaBank has set up confidential channels whereby employees can raise any doubts they may have regarding the interpretation or practical application of the codes and report possible violations.

3.2 Our responsibility as financial service providers

CaixaBank insists that its employees show respect for all individuals, their dignity and fundamental values, as enshrined in its *Code of Business Conduct and Ethics*. It also aspires to work with customers that share its values when it comes to respect for human rights, while acknowledging that the extent to which it can influence customers will depend on the nature and circumstances of the relationship.

Accordingly, CaixaBank shall use all means at its disposal to:

- Guarantee access to its services without discrimination on the grounds of gender, race, age or disability.
- Put a set of policies and procedures in place to ensure that the organisation possesses adequate knowledge and awareness of its customers, in accordance with prevailing legal requirements.
- Respect the confidentiality of all data belonging to customers and employees and the right to privacy of data subjects.
- Develop new products and financial services that reflect its aspirations on the subject of human rights.
- Offer customers products or services that are tailored to their circumstances and needs.
- Anticipate and offer solutions to customers in financial difficulty to prevent them from entering into default.
- Have specific programmes, products and services available to the most vulnerable groups of society and promote financial inclusion.
- Make social and environmental risks part of the decision-making process and refrain from financing or investing in companies and/or projects complicit in serious human rights violations. Specifically:
 - > The financing of investment projects considered significant because of the amount involved or the ensuing impact must comply with the commitments undertaken as signatory to the Equator Principles and in accordance with other internal standards governing the management of social and environmental risks.
 - > The Bank shall observe all rules and standards set out in its sector-specific policies.
 - > VidaCaixa and CaixaBank Asset Management have adhered to the UN Principles for Responsible Investment as a show of their desire to make these principles part of the process of managing mutual funds and pension plans.



CaixaBank therefore relies on policies, committees, due diligence processes and other internal systems to help it decide when it is appropriate or permissible to establish relationships with customers and engage in certain operations or ventures. The Bank's general processes are subject to controls, which depend on the size, sector and profile of the customer and the geography, context and potential risk of the potential adverse impact. The Bank may also rely on external support to help carry these controls as and when needed.

Meanwhile, CaixaBank has drawn up a policy for managing grievances and claims to ensure compliance with this Policy and all other policies and codes to which the Bank is subject. The purpose of the policy on grievances and claims is to ensure compliance with applicable law and regulations governing transparency and protection of consumers of financial services and to resolve conflicts and disputes and ensure the continuous improvement of marketing processes for its services. The Bank also provides various additional channels for communication, queries and claims to complement its official channels.

3.3 Our responsibility with suppliers

CaixaBank insists that its suppliers show strict respect for human and labour rights and encourages them to embrace behaviours aligned with CaixaBank's own values in their practices and transmit them across their own value chain.

CaixaBank therefore champions the following practices, among others:

- Awareness of and respect for the *Code of Conduct* among suppliers.
- Awareness of and respect for the Principles of the United Nations Global Compact.
- Running additional controls for those suppliers flagged internally as carrying moderate-high risk, if considered necessary.
- Implementing the necessary corrective action to mitigate any non-compliance with its standards.

3.4 Our responsibility as part of the community

The sustainability of CaixaBank's business model is directly linked to the prosperity of the territories in which it operates.

CaixaBank is fully committed to complying with all applicable law, collaborating with public institutions and the justice system and respecting internationally recognised human rights, wherever it operates. CaixaBank has also pledged to make a positive contribution to human rights across all communities in which it operates. In accordance with the mission, vision, values and commitments enshrined in its *Corporate Social Responsibility Policy, the Declaration on Climate Change and the Principles of Environmental and Energy Management*, CaixaBank promotes:

- The dissemination of international principles on human rights within its field of influence by collaborating with other institutions, international organisations and government agencies wherever possible;
- Initiatives and programmes that make a positive contribution to human rights and to the UN Sustainable Development Goals (decent housing, child vaccination, education, labour market integration of groups at risk of social exclusion, the fight against climate change, eradication of poverty, etc.).

CaixaBank also provides several communication channels through which stakeholders can raise queries and make suggestions and claims.

4. Implementation and communication of the Policy

When implementing this Human Rights Policy, employees, executive officers and members of the governing bodies shall comply with the *Code of Business Conduct and Ethics* ratified by the Board of Directors.

CaixaBank takes human rights performance into consideration when initiating, renewing, broadening or ending business relationships with third parties. It has therefore undertaken to dedicate the resources needed to ensure the effective implementation of this Policy.

The culture of human rights is entrenched at the Bank through regular communication and training activities. People discharging functions that may have a greater potential impact when it comes to human rights (including departments that manage project finance, employee relations or safety) receive special training.

Furthermore, the Bank regularly analyses the human rights side of its activities and has introduced due diligence processes to assess the risk of non-compliance. Based on the findings, it then proposes measures to prevent or remedy the negative impacts and to maximize the positive effects.

It shall also maintain and raise awareness of effective communication and reporting mechanisms so that the people directly affected by its operations can bring to its attention any situation that might have a

possible impact with regard to human rights. CaixaBank endeavours to align its communication channels with best practices at all times.

CaixaBank has relied on specialised external advice in drawing up this Policy.

This Policy will be announced and actively communicated to the entire workforce and to its commercial partners and other stakeholders.

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