



Principles of the Corporate Sustainability/Corporate Social Responsibility Policy

July 2020

Contents

Principles of the Corporate Sustainability/Corporate Social Responsibility Policy	2
1. Introduction	2
1.1 Background	2
1.2 Scope of the Policy	3
1.3 Objective	3
2. Scope of action of the Policy	3
3. General principles of action/Responsible management strategy	4
3.1 Principles of action and support instruments	4
3.2 General strategy for responsible and sustainable management	5
4. Framework of action with regard to corporate sustainability/social responsibility	8
4.1 Commitments in relation to the main stakeholders	8
4.2 Channels for stakeholder communication, participation and dialogue	11
5. Governance framework	12

Principles of the Corporate Sustainability/Corporate Social Responsibility Policy

1. Introduction

1.1 Background

The Board of Directors of CaixaBank, S.A. (hereinafter, **CaixaBank** or “**the Company**”) through the present *Corporate Sustainability/Corporate Social Responsibility Policy* intends to highlight the commitment of the entire CaixaBank Group (hereinafter, the CaixaBank Group) to an **efficient and responsible operating model, characterised by a strong social vocation.**

CaixaBank Group 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 CaixaBank Group 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.

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

The *Corporate Sustainability/Corporate Social Responsibility Policy* is rooted in the mission, vision and values of the Bank. Through this policy, the CaixaBank Group 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.

1.2 Scope of the Policy

The *Corporate Sustainability/Corporate Social Responsibility Policy* reflects CaixaBank Group's strategy and basic operating principles in terms of corporate sustainability/social responsibility, in line with the provisions of the Good Governance Code of listed companies and in accordance with the provisions of the Corporate Enterprises Act.

The *Corporate Sustainability/Corporate Social Responsibility Policy* includes initiatives for the correct performance in the integration of ESG criteria (*Environmental, Social, and Governance*) in the CaixaBank Group's activities. ESG criteria are as follows:

- **Environmental (E)**: factors related to the company's interaction with the environment;
- **Social (S)**: factors related to the company's impact on society and the community;
- **Good governance (G)**: factors related to how the company is managed.

1.3 Objective

The *Corporate Sustainability/Corporate Social Responsibility Policy* and the other instruments implemented by the Group must help:

- Attain CaixaBank 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 and increase the positive impacts.
- Enhance the reputation of the CaixaBank Group.
- Extend responsible principles and practices across society so that we can all make progress on social and environmental concerns.

2. Scope of action of the Policy

This is a *Corporate Sustainability/Corporate Social Responsibility Policy*, therefore its scope extends to the entire CaixaBank Group. In addition to being a corporate policy, it is also considered to be the individual policy of CaixaBank, the parent of the CaixaBank Group. This Policy will also be applicable to all employees, directors and members of the governance bodies of CaixaBank.

3. General principles of action/Responsible management strategy

3.1 Principles of action and support instruments

The CaixaBank Group undertakes to 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.

The Corporate Sustainability/Corporate Social Responsibility Policy is coherent and respectful of these operating principles, as well as the rest of the policies and standards developed by the Group that incorporate the values and standards that must be observed both in the internal professional relationships in the bank and in the external ones with the customers, shareholders and other stakeholders, in all the areas in which it operates.

This *Corporate Sustainability/Corporate Social Responsibility Policy* is developed and complemented, in addition to the **CaixaBank Code of Business Conduct and Ethics**, with other specific policies, rules and commitments related to its areas of application, as well as adherence to international initiatives in the area of corporate sustainability/social responsibility, which are detailed on the corporate website. These include the **United Nations Global Compact**, the **Principles for Responsible Investment of the United Nations (UNPRI)**, the **Principles for Sustainable Insurance (UNEP FI)** and the **Principles for Responsible Banking of the United Nations Environment Programme Finance Initiative (UNEP FI)**.



3.2 General strategy for responsible and sustainable management

The CaixaBank Group has a social and responsible banking model and its objective is to improve our customers' financial well-being and help society prosper.

The ***Socially Responsible Banking Plan***, created from the commitments enshrined in the *Corporate Sustainability/Corporate Social Responsibility Policy*, comprises a plan for action, dissemination and dialogue through a relationship model based on close relationships and a commitment to stakeholders and society as a whole. The action plan draws on lines of action within the framework of the ESG criteria:

- **Governance:**
 - Integrity, transparency and diversity: to strengthen its responsible activity.
 - Good governance policies: to maintain the best governance model possible.
- **Environmental:**
 - The environment: to collaborate in the fight against climate change.
- **Social:**
 - Financial inclusion: to remain true to its founding values.
 - Social action and volunteering: to respond to the social challenges of our environment.



Governance

One of the main objectives of the CaixaBank Group is to ensure the transparency, independence and good governance of the Group in order to safeguard the interests of all stakeholders and gain 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 the Company is present, in accordance with its corporate *Policy on Human Rights* and under the guidelines 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, the CaixaBank Group **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 the CaixaBank Group 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 Group products and services from being used for unlawful or illicit ends (such as the financing of terrorism, money laundering and 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 Group 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 all employees and suppliers can use the **whistle-blowing** channel to raise concerns or report breaches of the codes of conduct.
- **Promoting transparency when reporting information** to the CaixaBank Group's 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.





Environmental

The CaixaBank Group establishes the management of its business, projects, products and services on the respect and protection of the environment, committing itself to the conservation of the environment and respecting the current legislation in this matter in each case.

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 and inclusive 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, and also when managing assets.
- Comply with the most stringent **environmental standards** in the countries in which it operates.
- Work to improve internal processes and operations to enable a more efficient management of resources and **minimise the environmental impact**.
- Promote a responsible attitude among employees, customers, suppliers and society in general.
- Take part in national and 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.



Social

The CaixaBank Group promotes a socially responsible banking model that promotes **financial inclusion** and **social action** through:

- Access to **social impact financing** through MicroBank, its social bank.
- **Maintaining a territorial presence** through a wide network of branches.
- Adopting **physical accessibility measures and technology** for groups with physical and cognitive difficulties.
- Contributing to **the improvement of the financial culture** through training actions and content adapted to different channels and audiences.
- Contributing through its activity and results to the development of the community through the Welfare Projects of its reference shareholder, **"la Caixa" Banking Foundation**.
- Developing activities to encourage solidarity with its customers, and through the **"la Caixa" Volunteers Association**, promote corporate and customer volunteering.

4. Framework of action with regard to corporate sustainability/social responsibility

4.1 Commitments in relation to the main stakeholders



Clients

CaixaBank places customers at the centre of its activity, and consequently, **works to create value** for both them and for the environment in which they operate.

In all relationships with customers, CaixaBank will act with **honesty and professional responsibility**, working at all times with a customer orientation, a long-term vision and the willingness to maintain their trust at all times.

With this in mind, the companies of the CaixaBank Group undertake to:

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

Therefore, the marketing and sale of products will be performed in compliance with all applicable regulations. In this regard, within its own environment CaixaBank has set up a Transparency Committee, whose members come from the main departments involved in developing and marketing products. This body determines all transparency-related aspects of the design and marketing of financial instruments, banking products and savings and investment plans. There is also 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 to 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 in CaixaBank's voluntary adherence to AUTOCONTROL, the Association for Commercial Self-Regulation, which promotes good advertising practices.
- Protect the **confidentiality** of customer data.

- Uphold the highest standards of security and therefore promote practices that maximise the **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

The CaixaBank Group works hard to repay the trust that shareholders and investors have placed in the Bank and to meet their needs and expectations wherever possible. To do this, it seeks to offer tools and channels to facilitate their involvement and communication with the Group and to exercise their rights as owners.

To achieve this, CaixaBank undertakes to:

- 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*.
- Take advantage of new technologies, keeping the Bank at the cutting edge in the use of new communications channels.
- Roll-out **training and information** initiatives to the shareholders.
- Comply with the *Internal Protocol for relations between the "la Caixa" Banking Foundation, CriteriaCaixa and CaixaBank*, which is available on the Bank's corporate website.



Employees

CaixaBank Group'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, the CaixaBank Group will:

- 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 for reasons 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 protocols 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.



Suppliers

The CaixaBank Group seeks to ensure the responsible management of its supply chain, as set out in its *Procurement Principles* and *Supplier Code of Conduct*. The CaixaBank Group has assumed the following commitments along these lines:

- Ensuring maximum **transparency during purchasing and procurement processes**, which are channelled through tender processes except in those justifiable cases in which the nature of the services to be contracted impede or advise against this.
- Working only with those suppliers that **respect fundamental human and labour rights** when carrying on their business.
- **Encouraging responsible practices** amongst suppliers and their supply chain, through contractual clauses.

- Auditing the labour, social and environmental practices of suppliers when deemed necessary and acting accordingly when the findings prove unsatisfactory.



Company

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

Based on this commitment, the CaixaBank Group 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 circumstances:
 - MicroBank, its social bank, is the only Spanish entity to specialise in microfinance.
 - CaixaBank rolls out training initiatives to make the public more financially literate.
- 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** dedicated to the dissemination and promotion of responsible practices among customers and the communities in which the CaixaBank Group is present.

4.2 Channels for stakeholder communication, participation and dialogue

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

These channels may include: customer and shareholder freephone numbers and electronic mailboxes for shareholders and investors as well as suppliers; 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. Governance framework

The **governance bodies of CaixaBank** perform certain functions associated to their responsibility to approve and supervise the strategic and management guidelines established around corporate sustainability/social responsibility in the interests of all the Group companies, as well as the supervision, monitoring and integrated control of the Group's risks as a whole, among these being reputational risk.



The **Board of Directors of CaixaBank** are responsible for the strategic definition of CaixaBank and its Group, the specific organisation for its implementation and the supervision and control of compliance by the management with the management targets and guidelines established by the Board of Directors, all in accordance with the purpose and social interest of the CaixaBank Group, namely: The approval of the Corporate Sustainability/Corporate Social Responsibility Policy corresponds to the CaixaBank Board of Directors, which will adopt the necessary measures for the implementation and supervision of the development and application of the Policy.

The **CaixaBank Appointments Committee** is responsible, amongst other duties, for supervising the performance in relation to initiatives regarding corporate sustainability/social responsibility and for submitting any proposals it deems appropriate on this matter to the Board:

The **Risks Committee** advises CaixaBank's Board of Directors on the Group's overall risk appetite and its strategy to this end. Within the framework of the management of reputational risk, it reviews this Policy prior to its approval by the Board.

The **Audit and Control Committee**, with regard to this Policy, reviews the fulfilment of the regulatory requirements in relation to the preparation of financial information and performs a regular follow-up of the KPI (Key Performance Indicators) associated with the non-financial information included in the annual Management Report.

In relation to the corporate sustainability/social responsibility, as a key aspect of the management of reputational risk, the **Global Risks Committee** reviews this policy prior to its approval by the governance bodies.

CaixaBank's Management Committee is responsible for developing the Strategic Plan and the consolidated budget approved by the Board of Directors. During this development it will adopt resolutions, either directly or through its delegate committees, in relation to corporate sustainability/social responsibility.

To ensure good decision-making, CaixaBank has set up a **Corporate Responsibility and Reputation Committee** which reports to the Management Committee and is responsible for promoting and, where applicable, approving initiatives with regard to corporate sustainability/social responsibility, as well as coordinating or managing the approved initiatives.

This **Subsidiary Corporate Responsibility and Reputation Coordination Group** has the function of coordinating, informing and promoting initiatives with regard to corporate sustainability/social responsibility in the subsidiaries of the CaixaBank Group.

The **Executive Division for Communication, Institutional Relations, Brand and CSR** is responsible, among other duties, for implementing the corporate sustainability/social responsibility strategy and executing the Master Plan (*Socially Responsible Banking Plan*), preparing reputational risk management policies, managing the initiatives in this area approved by the governance bodies, monitoring the initiatives implemented in the CaixaBank Group and carrying out regular internal and external *reporting*.

Additionally, any **functional area of the CaixaBank Group** can, via the Corporate Responsibility and Reputation Committee or the Subsidiary Corporate Responsibility and Reputation Coordination Group, propose initiatives relating to corporate sustainability/social responsibility.

*Principles revised and approved by the Board of Directors on
23 September 2020.*