



Principles of Human Rights at CaixaBank

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Contents

1. Introduction.....	2
2. Scope and field of application.....	2
3. Commitments and principles of action	3
3.1 Our responsibility with employees	4
3.2 Our responsibility as financial service providers	5
3.3 Our responsibility with suppliers	7
3.4 Our responsibility as part of the community	7
4. Implementation and communication of the Principles.....	8
5. Governance framework.....	8
6. Update of the Principles.....	9

1. Introduction

The Board of Directors of CaixaBank, S.A. ("CaixaBank" or the "Company") has enacted these principles to manifest the Company's commitment with 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 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, collaborators, partners and other parties directly associated with its operations, products and services to do likewise.

2. Scope and field of application

The principles of activity will be the guide with regard to human rights within the relationships that CaixaBank establishes with its employees, customers, shareholders, suppliers, commercial partners and the communities where it performs its business and activities.

These Principles applied to all employees, executives and members of the Governance Bodies of CaixaBank.

These Principles are of a corporate nature therefore the Governance and Management Bodies of all CaixaBank companies must therefore act accordingly to implement the terms of these principles at their companies, following the principle of proportionality either by approving their own Principles in accordance with the principles set out in this document or by adhering to those of CaixaBank, duly adjusted to their specific circumstances and needs.

The participation of the following areas of CaixaBank was involved in the preparation of these Principles: Human Resources, Purchasing, Compliance and Control, Corporate Risk Management Function, Sustainability Risk, ESG Risks Administration and specialised external consulting firms.

CaixaBank will promote and make these Policies known among all its stakeholders.



3. Commitments and principles of action

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

- The United Nations International Bill of Human Rights, which includes:
 - > The Universal Declaration of Human Rights
 - > The International Covenant on Political and Civil Rights
 - > The International Covenant on Economic, Social and Cultural 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. Namely:

- 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 United Nations Environment Programme Finance Initiative (UNEP FI).
- The European Union Action Plan on Human Rights 2020-2024.
- The Commitment to Financial Health and Inclusion will be made on 2 December.

CaixaBank is working to understand the potential impacts that its activity may have. CaixaBank undertakes to prevent and avoid contributing to the adverse negative impacts and, in the event of doing so, to mitigate them as much as possible.

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

3.1 Our responsibility with employees

CaixaBank considers that the relationship it has with its employees is one of its main responsibilities with regard to human rights.

The policy on recruitment, management, promotion, remuneration and the development of people is grounded on a respect for diversity, equal opportunities and meritocracy with no consideration for their gender, gender identity, ethnicity, colour, nationality, creed, religion, political opinion, affiliation, age, sexual orientation, status, incapacity, disability and other situations protected by the law.

In this regard, CaixaBank has established internal policies and standards regarding:

- Promotion of diversity, inclusion and equal opportunities, including those principles as part of the remuneration policies of the Bank.
- Protection against harassment, discriminatory attitudes and abuse of authority.
- Freedom of expression and opinion.
- Freedom to join trade unions and go on strike
- Data protection and right to privacy
- 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.
- A decent days work respecting human rights and adapted to the prevailing labour legislation.
- Promoting professional development and training.
- The rejection of forced on child labour and human trafficking.



CaixaBank implements these Principles and standards by conducting training and awareness programmes and establishing monitoring indicators.

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

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, though 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 service without discrimination on the grounds of gender, gender identity, race, colour, nationality, creed, religion, political opinion, affiliation, age, sexual orientation, status, incapacity, disability and other situations protected by the law
- 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 the data belonging to customers and employees and the right to privacy of data subjects.
- Develop new products and financial services that reflect its aspirations with regard to human rights.
- Offer customers products or services that are tailored to their circumstances and needs.

- Ensure that the commercial information of the products and services is accurate, legal, honest and faithful.
- Anticipate and offer solutions to customers in financial difficulty to prevent them from entering into default.
- Have programmes, products and services available for the most vulnerable groups 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:
 - > Financing of investment projects considered significant because of the amount or impact involved is carried out in compliance with the commitments undertaken as signatories to the Equator Principles and according to the corporate Policy on sustainability/ESG risk management and other internal standards on social and environmental risk management.
 - > The Bank shall observe all criteria set out in its sector-specific policies.



CaixaBank therefore relies on policies, principles, 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.

CaixaBank has also drawn up a policy for managing grievances and claims to ensure compliance with these Principles and all other regulations 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 in order to resolve conflicts and disputes and ensure the continuous improvement of marketing processes for its services. The Bank also has several channels for communication, queries and complaints which complement the 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 *Suppliers Code of Conduct and the Principles of Procurement* as a framework for balanced collaboration between CaixaBank and its suppliers.
- Have a series of principles and procedures in place to ensure that the organisation has an adequate knowledge of its suppliers, in accordance with the legal requirements applicable in each case.
- Awareness of and respect for the Principles of the United Nations Global Compact.
- Running additional controls for those suppliers considered internally as moderate-high risk, if considered necessary.
- Implementation of the corrective actions required to mitigate any potential 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 its mission, vision, values and commitments enshrined in its *Corporate Sustainability/Social Responsibility Policy and the Declaration on Climate Change*, 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 Principles

Implementation of these Human Rights Principles by employees, managers and members of the governance bodies will include compliance with the Code of Business Conduct and Ethics adopted by the Board of Directors.

CaixaBank takes human rights actions into consideration when initiating, renewing, expanding or ceasing business relationships with third parties. In this regard, it agrees to dedicate the resources necessary to ensure effective implementation of these Principles.

The culture of human rights is entrenched at the Bank through regular communication and training activities. Employees with functions that have a greater potential impact on human rights (including the areas that manage *project finance*, work relations or security, etc.) receive special training.

In addition, the Company periodically analyses human rights affairs in association with its activity and introduces due diligence processes to assess the risk of non-compliance, followed by proposals of measures to prevent or remedy detrimental impacts and measures to maximise positive effects.

In particular, the company undertakes to carry out this assessment exercise every three years or before if circumstances warrant it.

Meanwhile, it shall maintain and raise awareness of effective communication and reporting mechanisms so that the people directly affected by its operations can bring any situation to its attention that might have a possible impact with regard to human rights. In this regard, CaixaBank continually works to align its communication channels with best practice at all times.

These Principles will be announced and communicated actively to all the staff, suppliers, business partners and other relevant parties.

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 Human Rights 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.

The **Board of Directors of CaixaBank** is responsible for ensuring compliance with these Principles and the commitment with the stakeholders included in this document.

The **CaixaBank Appointments and Sustainability Committee** is responsible, among other duties, for supervising the performance in relation to Environmental, social and governance initiatives, among these being those relating to Human Rights, and for submitting any proposals it deems appropriate on this matter to the Board.

The **Audit and Control Committee of CaixaBank**, with regard to these Principles, 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.

The **Management Committee** plays an essential role in transferring the criteria and principles of good governance throughout the internal organisation of CaixaBank, among which are the fulfilment of the prevailing legislation and assuming and updating these principles.

The **Sustainability Committee**, which is accountable to the Management Committee, is responsible for approving the strategies and practices in Human Rights at CaixaBank, as well as promoting and, where appropriate, approving initiatives in this area, coordinating and managing the approved initiatives and their monitoring, as well as proposing and submitting them to the governance bodies for approval.

The **Sustainability Division** is responsible for encouraging the fulfilment of the Principles and promoting initiatives in order to move forward in respecting, defending and promoting human rights and executing the Sustainability Master Plan, as well as 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.

Lastly, **the different areas and divisions affected by these Principles** will be responsible for the application, integration and execution of their provisions in their daily activities and in any associated internal regulations, as deemed appropriate, as well as establishing and implementing follow-up checks of their application.

6. Updating of the Principles

These Principles will be reviewed by the Board of Directors once every two years. However, as the body responsible for the Principles, the Sustainability Division shall review its contents annually and, where deemed appropriate, shall propose amendments to present to the Board of Directors for approval.

In addition, any update to the Principles may be initiated at any time at the request of any of those areas involved that may have identified the need for their amendment, on the grounds of, for example:

- Changes to the regulatory framework.
- Changes in the business strategy and goals.
- Changes in management approach all processes.
- Changes deriving from the results obtained during follow-up and control activities.
- Changes deriving from the Due Diligence and assessment process
- New policies or amendments to existing ones that affect the content of these Principles
- Modification of the organisational structure involving a change in the management functions of these Principles.

Principles approved by the Board of Directors, on January 27, 2022