

## Slavery and Human Trafficking Statement 2023

This statement is published on behalf of CaixaBank S.A. pursuant to Section 54(1) of the Modern Slavery Act 2015 in respect of the financial year ended 31 December 2023. References to "CaixaBank," "we," "us," "our" or the "firm" are to these named entities.

This statement describes the measures taken by CaixaBank to mitigate the risk of slavery and human trafficking, within our business or our supply chain for the financial year ended 31 December 2023.

### About CaixaBank

CaixaBank is a credit entity organised under the laws of the Kingdom of Spain. It is subject to the consolidated supervision of the single supervisory mechanism of the European Central Bank ("ECB") and Bank of Spain ("*Banco de España*"). It is entered in the Register of Banks and Bankers with code number 2100. It is listed on the Spanish Stock Exchange ("CABK"), whose shares are admitted to trading on the Barcelona, Madrid, Valencia and Bilbao stock exchanges and on the continuous market and have been included on the blue-chip IBEX 35 since 4 February 2008. CaixaBank is also included in other international stock market indices, such as the Euro Stoxx Bank Price EUR, the MSCI Europe, the MSCI Pan-Euro, the FTSE4Good, a prestigious FTSE index that rates the investments of companies as sustainable on the basis of their corporate social responsibility practices, the FTSE Eurofirst 300, consisting of the 300 leading European companies by market capitalization, and the Dow Jones Sustainability Index, which reflects, inter alia, the company's commitment to sustainability and corporate reputation in its business activities and investments. It is also listed on the Advanced Sustainable Performance Index (ASPI), which features the top 120 DD Euro Stoxx companies in terms of sustainable development performance.

CaixaBank focuses on generating value for its clients in contributing to their financial well-being and ultimately contributing as well to the progress of the society in supporting the progress of the whole of society. We are a deeply committed bank in all areas in which we work. For this reason, we help communities where we conduct our business thrive. We contribute to the progress of society through: (i) effectively and prudently channelling savings and financing, and guaranteeing an efficient and secure payment system; (ii) financial inclusion and education, environmental sustainability, support for diversity, supporting housing aid programs and promoting corporate voluntary work; and (iii) our collaboration with the Obra Social of the Fundación Bancaria Caja de Ahorros y Pensiones de Barcelona, "la Caixa" ("la Caixa" Banking Foundation). The "la Caixa" Banking Foundation budget is partly funded through the dividends received from CriteriaCaixa, which is a fully owned subsidiary of the "la Caixa" Banking Foundation and the largest shareholder of CaixaBank. A large part of this budget is utilized to fund local needs that are identified through the CaixaBank branch network in Spain and Portugal through Banco BPI (CaixaBank's fully owned Portuguese banking subsidiary).

CaixaBank has a branch in the United Kingdom and is registered with Companies House, with company no FC032858 and UK establishment no BR017941. The registered office is at 8<sup>th</sup> Floor, 63 St Mary Axe, London EC3A 8AA. It is authorized by the European Central Bank (National Bank of Spain) and in addition, its UK regulated activities are subject to supervision by the Prudential Regulation Authority and the Financial Conduct Authority. Details regarding the scope of CaixaBank S.A.'s regulatory permission given by the Prudential Regulation Authority and Financial Conduct Authority are available online through the FCA's Financial Services Register.

### Organization

As of 31 December 2023, CaixaBank has 44,863 employees, more than 20.1 million customers and 4,199 branches, mainly within Spain and Portugal. It is one of the leading financial service providers in that region.

CaixaBank, a listed company, is neither controlled nor has a dominant influence exerted on it by any other person or company. CaixaBank's biggest shareholder is CriteriaCaixa, S.A.U., as a consequence of certain reorganization proceedings. Criteria Caixa, S.A.U. has a shareholding in CaixaBank (and

indirectly by "la Caixa" Banking Foundation ) of 31.92% and it acts as a holding company, being a wholly owned subsidiary of the Fundación Bancaria Caja de Ahorros y Pensiones de Barcelona, "la Caixa". The Spanish banking executive resolution authority named "Fondo de Reestructuración Ordenada Bancario" or FROB (via its subsidiary BFA Tenedora de Acciones, S.A.) has a 17.32% shareholding in CaixaBank. The remaining share capital of CaixaBank is primarily held by way of free float capital being 50.76% and the remaining percentage held by CaixaBank as treasury stock and by CaixaBank's Board members.

### **Commitments and Policies**

CaixaBank's various policy frameworks includes a range of people and procurement policies that outline our commitment to modern slavery and human trafficking risks in our business. Relevant policies include:

- **Principles of Human Rights at CaixaBank Policy:** makes explicit our commitment to operate within a culture of respect for human rights and expects its employees, other stakeholders directly associated with its operations, products and services to follow suit. For CaixaBank, respect for human rights is an intrinsic part of its values and a minimum benchmark for the legitimacy of its business activities. This Policy confirms our commitment in respect of the Core International Rights Treaties of the United Nations, the International Labour Organisation's Declaration on the Fundamental Principles and Rights at Work and the EU Charter of Fundamental Rights. CaixaBank also pledges to carry on its business in strict compliance with applicable law and regulations and in accordance with the highest standard 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 Women's Empowerment Principles;
  - The Equator Principles;
  - The United Nations Environment Programme Finance Initiative (UNEP FI); and
  - The European Union Action Plan on Human Rights 2020 – 2024.

<https://www.caixabank.com/en/sustainability/responsible-practices/key-ethics-integrity-policies.html>

- **Code of Business Conduct and Ethics:**

CaixaBank is committed to carry out its activities in accordance with the most scrupulous legal and ethical requirements and the optimum standards of professional conduct, both in the interest of its customers as well as of the community and all those who that are directly related with CaixaBank in any way. The Code prohibits any discrimination, harassment, abuse or improper treatment of any kind.

We provide and are committed to providing a working environment free of harassment, intimidation and offensive or inappropriate conduct, including sexual propositions and suggestions or other activities that may offend a person's dignity.





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, suppliers shall respect fundamental human and labour rights when undertaking their business and work to spread them across their value chain.

CaixaBank Code of Conduct (May 2023): [Codigo Etico ENG.pdf \(caixabank.com\)](#)

- **General Principles of Corporate Policy on Criminal Compliance:**

The objectives of this Policy are, principally:

- I. To convey to all employees, executives and members of the governing and administrative bodies of CaixaBank and its subsidiaries that constitute a relevant perimeter as detailed by CaixaBank, as well as any associated persons who are related to it, the commitment of CaixaBank's subsidiaries to ensure that their activity is based on respect for the laws and regulations in force at all times, as well as in the promotion and defence of their corporate values and principles of action established in the Code of Ethics. In addition, to ratify their strict compliant conduct in criminal matters.
- II. To establish a general framework for the entity's Criminal Prevention Model, adapting it to the new regulatory provisions. This Model comprises a set of measures aimed at preventing, detecting and reacting to criminal behaviour and identifies the risks and controls.
- III. To assure shareholders, customers, suppliers, judicial bodies and society in general that the CaixaBank Group complies with its duties of supervision and control of its activity, establishing appropriate measures to prevent or reduce the risk of crimes being committed and that, therefore, the legally appropriate control is exercised over directors, executives, employees and other associated persons.

In addition, this Policy describes the different criminal offences which, in accordance with the provisions of the Spanish Criminal Code, may be imputable to legal entities in Spain and UK, including Human trafficking.

The Policy is reviewed every year or when changes are necessary due to changes in regulations.

Additionally, CaixaBank has a Corporate Crime Management Committee (the "CCM Committee"). This CCM Committee is responsible for organizing and managing crime-prevention activities including all procedures, measures and controls existing in the Group. Its main purpose is to devise a system for preventing and responding to any criminal conduct, being a high-level body with powers of initiative and control.

During 2023 three satisfactory audits were carried out by AENOR to certify compliance with the standards established in UNE19601 (Criminal Compliance Management Systems); ISO37001 (Antibribery Management Systems) and ISO37301 (Compliance Management Systems).

*General Principles of Corporate Policy on Criminal Compliance (September 2023):*  
[Corporate Policy on Criminal Compliance ENG.pdf \(caixabank.com\)](#)

- **General Principles of Corporate Anti-corruption Policy:**

The General Principles are an essential tool to prevent the CaixaBank Group companies and its external collaborators from engaging directly, or through intermediaries, in conduct that may be against the law or the core business principles of CaixaBank: respect, integrity, transparency,



excellence, professionalism, confidentiality, and social responsibility. CaixaBank takes an active position in rejecting all forms of corruption in all the markets where it operates.

The General Principles adapt to the highest international standards, alongside the Code of Ethics, and is an integral part of the CaixaBank Group Crime Prevention Model.

Additionally, these Principles establish a set of due diligence measures aimed at ensuring that third parties with whom contractual relationships are aligned with current regulations and observe CaixaBank's values.

*General Principles of Corporate Anti-Corruption Policy (May 2023):* [2023 Principios Anticorrupcion limpios ENG.pdf \(caixabank.com\)](#)

- **Principles of Procurement:** establishes a general framework in which activities related to procurement management are carried out, and in which the supplier relationship and contracting model is defined between CaixaBank and its suppliers, promoting stable business relations in keeping with our values. Amongst other things, it promotes relationships with suppliers that share CaixaBank's guidelines established in the Code of Business Conduct and Ethics, Corporate Human Rights Policy, Anti-corruption policy, Supplier Code of Conduct, Corporate Social Responsibility and Risk Prevention at Work.

*Procurement Principles (March 2023):* [Principios de Compras ENG.pdf \(caixabank.com\)](#)

- **Supplier Code of Conduct:** sets out our expectations of suppliers providing goods and services to CaixaBank. It requires our suppliers to show strict respect for human and labour rights.

*Supplier Code of Conduct (November 2023):* [Codigo de Conducta Proveedor ENG.pdf \(caixabank.com\)](#)

- **The Reporting and Whistleblowing Channel:** CaixaBank has a confidential Whistleblowing Channel where any possible irregularities that could represent breaches may be can be raised anonymously and reported. The Channel is available to directors, employees, interns, temporary staff, agents, brokers, collaborators, prescribers, suppliers and people working under their supervision and direction, shareholders, former employees and job candidates. This Channel is accessible through the compliance site on CaixaBank's Intranet, from the financial terminal, in our suppliers' portal and via the internet

*Whistleblowing Channel:* [Portal Whistleblowing Channel - Whistleblowing Channel \(service-now.com\)](#).

Requests for clarification of specific doubts regarding the application or interpretation of the below listed rules of conduct are managed and resolved separately in 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, through CaixaBank's Consulting Channel:

- Code of Business Conduct and Ethics;
- Anti-Corruption Policy;
- Criminal Compliance Corporate Policy;
- Internal Code of Conduct in scope of Stock Market;
- Supplier Code of Conduct; or



- any other policy and internal rule applicable to the CaixaBank Group companies.

*Consulting Channel:* [Portal Consulting Channel - Consulting Channel \(service-now.com\)](https://service-now.com)

CaixaBank does 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. Along these lines, CaixaBank shall continually work to align communication channels with best practices.

- **Outsourcing Governance Policy:** CaixaBank, within the framework of its internal Outsourcing Governance Policy, promote the obligation of the supplier, and, where applicable, its subcontractors, to respect, while providing services to CaixaBank, human rights in all territories, to reject any type of discrimination, harassment, abuse or inappropriate treatment. Moreover CaixaBank encourages responsible practices between suppliers and their supply chain through contractual clauses. The Outsourcing Governance procedure is based on principles that are linked, among others, to the Supplier Code of Conduct or the Corporate Human Rights Policy.

All these policies are available to all employees on our Intranet pages.

### **Our people**

In respect of all our employees, at CaixaBank, we believe everyone has a right to be treated with dignity and respect and to work in a safe and supportive environment. This is evidenced by the Equal Opportunities Policy, the Ethics Policy, the Anti-Harassment and Bullying Policy and the Health and Safety policy. In particular for CaixaBank's branch in the UK, these are laid down in an employee handbook for such employees and for all other employees, such policies are directly applicable with further protections provided under the law of the relevant jurisdiction.

We are committed to creating an open and transparent culture and encourage all employees to act responsibly and speak up when they believe their rights have been infringed, for example by using the Anti-Harassment and Bullying Policy or the Grievance Policy.

We have put policies in place that set out the values and behaviours we expect everyone to demonstrate, which helps our organisation and employees to comply with regulatory conduct requirements.

We make sure we reward our employees fairly and appropriately for the role they are doing whilst rejecting any type of discrimination.

### **Strategy and Due Diligence**

CaixaBank expects our suppliers to adopt the same high standards that we adhere to and have fair employment practices. These standards are reflected in the policies we generally share with our suppliers and ask them to commit to as part of a tender process. CaixaBank is willing to ensure that suppliers with whom they have contractual relationships respect the Supplier Code of Conduct. It is mandatory for suppliers to adhere. Guidelines of conduct are defined in the Supplier Code of Conduct that the companies working as suppliers will follow in relation to complying with prevailing legislation, ethical behaviour and measures against bribery and corruption, safety and the environment and confidentiality. The Supplier Code of Conduct is linked above and is also available to suppliers in our supplier portal.

CaixaBank is able to audit and carry out performance evaluations of a supplier in order to ensure that the processes, supplied products and services match the requirements, while determining the controls to apply, where applicable. Non-compliance with the content of the Supplier Code of Conduct may be the reason for the contractual relationships with any supplier being terminated early.

The objective of our strategy and due diligence procedure is to equip CaixaBank to be able to mitigate potential risks throughout the supplier engagement lifecycle from on-boarding through to performance improvement, gain further visibility into our supply chain and to enable regular review of our data sets and

risk register. It additionally ensures the continuous improvement of our approach to supply chain risk management.

### **Assessing and Managing Risk**

CaixaBank has developed a risk identification and due diligence process for human rights within the framework of the corporate Human Rights Policy. CaixaBank conducted a human rights due diligence and assessment exercise in 2023, taking into account the EU Corporate Sustainability Due Diligence Directive and the need to integrate human rights due diligence into business strategies.

In respect of the risk assessment and due diligence as regards human rights procedure, CaixaBank's starting point is to firstly complete the following due diligence phase:

- identify risk events in accordance with the commitments and principles of action acquired in the Principles of Human Rights at CaixaBank and potential Human Rights violations, in response to CaixaBank's responsibility to its employees, as financial service providers, suppliers and as part of the community;
- define the criteria to be followed when assessing, prioritising and managing those risks; and
- establish due diligence measures to prevent and mitigate the impacts identified within the business, across the supply chain and/or through other business relations and to explain how such impacts should be addressed.

Secondly, CaixaBank completes the following assessment phase:

- identification and evaluation of risk events and potential Human Rights violations, in relation to CaixaBank's responsibility towards its employees, suppliers, and as providers of financial and investment services;
- building risks maps with regard to Human Rights, taking into account the entity's current situation, and following the relevant criteria for assessing probability, impact and severity; and
- verifying the due diligence processes and elements established by CaixaBank to prevent and mitigate the potential risks determined in the risk maps (for each of: people management; financing; investment; purchasing; and supplier management and commercialization).

More details regarding the risk identification and due diligence process can be examined in the summary of the human rights' due diligence and risk assessment.

*Summary of the Due Diligence process and Human Rights Assessment (July 2023):*  
[Resumen CaixaBank DD DDHH 250723 EN.pdf](#)

### **Training**

Annual training in standards and regulations is launched to all employees. All new employees must complete the compliance questionnaire on high ethical standards. All new employees are provided the Code of Ethics and the main Standards of Conduct. In addition to receiving specific training on compliance courses on regulatory matters or issues of sensitivity regarding conduct.

CaixaBank continues working on a project that aims to reinforce the culture of conduct and compliance, integrating it into the daily management throughout the organization.

Such training includes the following:

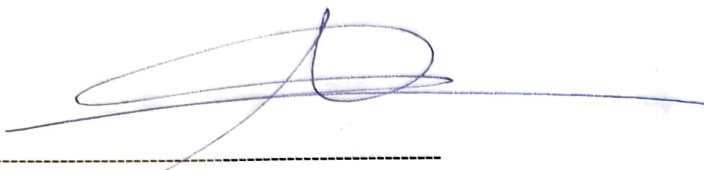
- April 2017: Code of Business Conduct and Ethics
- January 2018: Criminal Prevention Model
- April and May 2019: Code of Business Conduct and Ethics, Antibribery Policy and Conflict of Interest
- February 2020: The Reporting and Whistleblowing Channel
- February 2021: Criminal Risk Prevention

- September 2022: Internal Code of conduct
- December 2023: Ethics and Integrity

INFORME DE GESTION CONSOLIDADO ING.pdf (caixabank.com) (pg 159)

**Approval**

This was approved by CaixaBank's Management Board on \_\_\_\_\_ 2024 and signed by Ignacio Badiola, Head of CIB & International Banking.

  
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This statement will be reviewed and updated annually.