CODE OF ETHICS AND PRINCIPLES OF CONDUCT

"la Caixa" Foundation
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It is an organisation that works for the advancement of society, committed to the present and future of people.

The Foundation’s activity revolves around one fundamental purpose: to build a more united, fairer, better society by meeting the needs of its most vulnerable members.
“la Caixa” was born when the Caixa d’Estalvis i Pensions de Barcelona became a banking foundation. It was founded in 1904 by the humanist Francesc Moragas with the aim of promoting savings, dignifying old age, eradicating illness and offering the working class and the needy a better future. Its primary concern has always been to provide and develop the “social outreach” initiatives that have defined the Foundation from the moment of its creation.

Over 100 years have passed since then, and in that time “la Caixa” has managed to consolidate its founding values and principles, fulfilling its mission of building a fairer, better society that offers more opportunities to the people who need them most. For all these reasons, “la Caixa” focuses on programmes with the greatest potential for change, such as initiatives to combat child poverty and social exclusion, promote employment and improve the quality of life of society’s most vulnerable members.

In addition, the Foundation is active in other areas that are essential for promoting progress and equal opportunities, such as biomedical research and innovation, high-quality training, the arts and education.

Our corporate purpose = Corporate social responsibility
Definitions

“LA CAIXA”: Fundación Bancaria Caixa d’Estalvis i Pensions de Barcelona, “la Caixa”

THE “LA CAIXA” GROUP: the companies and organisations in which Fundación Bancaria Caixa d’Estalvis i Pensions de Barcelona, “la Caixa”, has or may have a controlling interest.

INTERNAL REGULATIONS: policies, rules, procedures, instructions and other internal documents adopted by “la Caixa” that expand on the guidelines of conduct set out in the Code of Ethics.

PERSONS BOUND BY THE CODE (HEREINAFTER AFFECTED PERSONS): all individuals who provide professional services at “la Caixa”, i.e. employees, regardless of the nature of their contract with the organisation, executives and members of the Board of Trustees.

STAKEHOLDERS: organisations or individuals who may be significantly affected by the activities of any of the companies and organisations included in the “la Caixa” Group, and whose actions may affect the organisation’s ability to successfully implement its strategies and achieve its objectives.
Objectives and Scope of Application

The objectives of this Code are as follows:

- **To establish the fundamental ethical values and principles of conduct** for “la Caixa”, which in turn should inspire its internal regulations, procedures and guidelines.

- **To define the basic rules of conduct** that should guide the actions of Affected Persons in the performance of their duties.

- **To set an example of outstanding professional conduct** for all Stakeholders that have a relationship with “la Caixa”, in all matters that concern them.

- **To clearly convey the fact** that “la Caixa” is firmly committed to ensuring that all Affected Persons behave in an ethical way and make well-grounded decisions.

**FOR WHOM IS THE CODE OF ETHICS INTENDED?**

The Code will apply to all individuals who provide professional services at “la Caixa”, i.e. employees, regardless of the nature of their contract with the organisation, executives and members of the Board of Trustees of “la Caixa”, with the aim of helping the entire organisation attain the highest standard of excellence through upright and ethical conduct.

Moreover, “la Caixa” will promote and encourage the application of the Code at all companies in the “la Caixa” Group, its suppliers, and other organisations with which it has contractual and/or collaborative relationships, or, when appropriate, urge these parties to adopt principles of conduct and values similar to those set out herein.
Responsibilities

”la Caixa” Board of Trustees

As the highest governing body and representative of the Foundation, the responsibilities of the “la Caixa” Board of Trustees include:

1. Approving the “la Caixa” Code of Ethics and any substantial modifications made to it.

2. Creating the “la Caixa” Ethics and Crime Prevention Committee, as well as approving and modifying, in any substantial aspects, the operating procedure of the “la Caixa” Ethics and Crime Prevention Committee.

”la Caixa” Ethics and Crime Prevention Committee

The “la Caixa” Ethics and Crime Prevention Committee will be a qualified multidisciplinary body with independent powers of action and supervision. Among other duties, it will handle all matters related to the “la Caixa” Code of Ethics.

In fulfilment of its responsibilities, the committee will meet periodically and act in accordance with applicable internal regulations.

All members of the Ethics and Crime Prevention Committee will be obligated to:

/ operate independently and fairly,

/ respect the confidentiality of all information and to take actions to ensure that employees or third parties involved in reporting possible violations do not suffer retaliation.
Values and Principles of Conduct

VALUES

What guides us?

The fundamental values of “la Caixa”, which guide and govern all the foundation’s activities, are as follows:

Social commitment: understood as a commitment to building a better society. The intended beneficiaries of the work, effort and capacity of “la Caixa” are people, especially the most vulnerable, and members of society who have fewer opportunities.

Responsibility: with regard to the duty to ensure that the Foundation’s activities are conducted in accordance with the criteria of managerial excellence and effective results. Therefore, programmes must be assessed and their initiatives dynamically defined to maximise the achievement of their stated goals.

Trust: earned by convincing society of the value of the “la Caixa” Foundation’s activities and the impact of its programmes. Quality must be the defining trait of all the organisation’s actions and interventions.
How do we act?

The principles of conduct at “la Caixa” which this Code endorses and explains in detail with a view to upholding the aforementioned values are:

1. Compliance with laws and regulations
2. Integrity and transparency
3. Corporate social and environmental responsibility
4. Respect for people
5. Professionalism and teamwork

Why do they matter?

These principles matter because they reflect the kind of organisation “la Caixa” aspires to be, allowing it to forge lasting relationships with the organisations, beneficiaries, suppliers and other stakeholders with which it associates, with the shared aim of having a positive impact on society.

“la Caixa” will seek to collaborate with third parties whose standards of conduct are similar to the values and principles of conduct set out in this Code.
Affected Persons must exhibit **upright, honest professional conduct** when carrying out their duties. Furthermore, they are expected to comply with:

- All applicable legislation (laws, regulations, provisions, circulars issued by regulatory bodies, etc.)
- The internal regulations of “la Caixa”.
- The principles and rules that apply to their specific field or profession, as well as the business customs and etiquette of the place where they work.
- The obligations and commitments undertaken by “la Caixa” in its contractual relationships with third parties.

“la Caixa” may be held legally responsible for violations of laws, regulations and other legally binding rules, or any other form of illicit activity, by its employees, executives and Trustees, whether or not they were committed for their personal gain, which could directly or indirectly benefit “la Caixa”. For this reason, “la Caixa” expects Affected Persons to act in a licit, ethical and professional manner at all times when carrying out their duties.

In this respect, they must be especially vigilant in complying with the rules that apply to activities related to being committed crimes defined in the Spanish Criminal Code with regard to the management and operations of “la Caixa”.
Affected Persons must perform their professional duties with integrity, honesty and transparency, acting in good faith and conveying credibility to those around them at all times. Additionally, “la Caixa” will encourage the social organisations, partners and suppliers it works with to follow the same standards of conduct.

“la Caixa” has joined the United Nations Global Compact and is firmly committed to its principles of conduct and action in the areas of human rights, labour, environment and anti-corruption, having integrated them in its daily operations.

For “la Caixa”, building trust in the communities where it operates is a vital part of achieving its corporate purpose.

2.1. Conflicts of interest

All Affected Persons have an obligation to further the interests of “la Caixa” and are prohibited from using any information they may have about “la Caixa” for their own personal gain or for the benefit of third parties. They must act in the best interests of “la Caixa” at all times, remaining objective and uninfluenced by any private interests.

Affected Persons may not engage in professional activities outside the “la Caixa” Group that create a conflict with their activities inside the “la Caixa” Group and/or may interfere with the group’s interests. They must avoid all situations where there is a real or potential conflict of interest, including those derived from family or other personal relationships. In such situations, the person affected by the real or potential conflict of interest must abstain from intervening or participating in the negotiation or operation in question. Consequently, persons bound by this code must refrain from participating in transactions of any kind in which they or a related party have a personal interest.
Affected Persons may not accept gifts, incentives, favours or gratuities except when permitted by normal business customs as specified in the internal regulations of “la Caixa”. Likewise, they may not offer gifts to third parties other than those of an institutional nature which are expressly sanctioned.

“la Caixa” has mandatory internal regulations anti-corruption, which must be followed as expressed and as the specific implementation of the general principles set out in this section.

2.2. Transparency

For “la Caixa”, being transparent to society is a fundamental cornerstone of its activities.

“la Caixa” undertakes to provide its beneficiaries and partners with accurate and truthful information about its activities and its procedures for handling complaints and solving incidents.

“la Caixa” must contract suppliers in a context of free-market competition, uninfluenced by any relationship or interference other than its own interests. Without prejudice to the financial and technical conditions, business relationships with suppliers should be beneficial to both parties. Goods and services must be purchased or contracted objectively and transparently, uninfluenced by any kinship, financial or friendship ties with the supplier and avoiding situations that might cast doubt on the impartiality of the people involved in making such decisions.

“la Caixa” has mandatory internal regulations governing the purchase of goods and services, which establish the criteria and procedures for contracting with third parties.

2.3. Processing information

“la Caixa” is aware of the importance of information for carrying out its activities. Therefore, Affected Persons must process information in a way that ensures:

1. **Truthfulness**: the truthfulness and accuracy of information is a basic principle, and Affected Persons must therefore make every effort to convey the information they share, whether internally or externally, in a truthful manner.

2. **Confidentiality**: The confidentiality of information regarding beneficiaries, employees, members of the governing bodies and management, suppliers and partner organisations is the foundation of a relationship of trust. Applicable legislation and internal rules on the use and confidentiality of personal
data and privacy must be followed at all times. If people have access to confidential information in the course of performing their professional duties, they may not use it for personal gain or the benefit of third parties.

3. **The good reputation of “la Caixa”:**
   All Affected Persons must do their utmost to preserve the image and reputation of “la Caixa” in all their professional undertakings. Whenever they appear or choose to identify themselves as employees, executives or Trustees of “la Caixa” on any social media (internet, social networks, etc.), they must strive to ensure that the image of “la Caixa” is used correctly and appropriately and respect the ethical values it promotes.

2.4. **Protecting the assets of “la Caixa”**
   Affected Persons must strive to ensure that the property and assets of “la Caixa” are properly used and maintained. These may only be used for pertinent and legitimate purposes within “la Caixa”.

   The property and assets created for “la Caixa” in the context of a professional relationship involving service provision, regardless of whether the resources used are internal or external, belong to “la Caixa”, even after the relationship with the Foundation comes to an end.

   Rules regarding the use of resources, “la Caixa” computer security and software copyrights must be followed at all times, using only those authorised by the Foundation in accordance with its internal regulations.

2.5 **Handling personal affairs**
   The good reputation of “la Caixa” depends on society’s perception of its activities in every field in which it operates and the conduct of its employees, executives and Trustees. Therefore, when engaged in personal activities, especially those that may reach the public via conventional or social media, Affected Persons must refrain from mentioning or using the name or image of “la Caixa” for personal social, political or other aims, as well as from behaving outside the workplace in a manner that might damage the Foundation’s good name or its legitimate interests.

   “la Caixa” respects the political diversity of the societies in which it operates, and therefore all its activities must be guided by the principle of political neutrality.

   If Affected Persons choose to relate, collaborate, associate or affiliate themselves with political parties or other public organisations or institutions, they must make it clear that they are doing so as private individuals and avoid involving “la Caixa” in any way.
“la Caixa” is committed to **achieving an environmentally and economically sustainable world** and it believes that conducting human activities in a responsible, legal and ethical way contributes decisively towards this goal. The decision to adopt the principles of the United Nations Global Compact is a sign of its wholehearted commitment to social responsibility and sustainability.

Moreover, as part of “la Caixa”‘s commitment to sustainability, its strategic programmes are aligned with the UN’s Sustainable Development Goals.

“la Caixa” is an organisation with a **strong sense of environmental responsibility and it is committed to environmental conservation**, respecting all applicable laws in this area and taking the necessary steps to measure and reduce the environmental impact of its activities.

“la Caixa” supports raising awareness and educating about the environment and promotes initiatives that aim to find solutions to the greatest challenges faced by humanity, with consideration for the sustainability and improvement of environmental health.

“la Caixa” **encourages Affected Persons to actively do their part to protect the planet**, whether by adopting responsible habits in the workplace and in their own homes, or by participating in personal or third-party initiatives.
### 4. Respect for people

#### 4.1. Diversity and non-discrimination

“la Caixa” respects people, their dignity and their fundamental values. It therefore promotes equal opportunities and does not tolerate discrimination, harassment, abuse or inappropriate treatment by reason of gender, ethnicity, nationality, creed, religion, political opinion, affiliation, age, sexual orientation, disability or any other situation protected by law, with regard to Affected Persons as well as beneficiaries, partners, suppliers, users or any other person who interacts with the organisation.

“la Caixa” is an equal-opportunity employer, and its hiring and evaluation processes are based on candidates’ merit or professional qualifications and skills.

#### 4.2 Working environment and work-life balance

Affected Persons and “la Caixa” will maintain a working environment free of harassment, abuse of authority, intimidation and violent, offensive or inappropriate behaviour, the aim or consequence of which is to undermine the dignity of others and create an intimidating, hostile, demeaning, humiliating or offensive environment. Affected Persons must avoid and report such behaviour, and “la Caixa” is responsible for preventing it and, if necessary, taking disciplinary measures. In this respect, “la Caixa” has a protocol in place to prevent, address and eradicate sexual and workplace harassment within the organisation, as well as a procedure of action with a special channel for reporting any such incidents.

“la Caixa” fosters and promotes a favourable, inclusive working environment that facilitates flexible hours and a balance between the personal, family and professional lives of all employees, with the aim of improving their quality of life and efficiency on the job.
“la Caixa” believes that its staff and the values and principles that drive them are its most important asset. “la Caixa” will respect and promote diversity, valuing each person’s unique skills and contributions. Working together, combining the individual strengths of each team member, always yields better results.

4.3 Career training

“la Caixa” will provide Affected Persons with training opportunities suited to their job positions and responsibilities, thereby improving their knowledge and skills, with a view not only to achieving the organisation’s objectives but also to helping people advance their professional careers. Training and advancement programmes aim to promote equal opportunities.

4.4 Occupational health and safety

“la Caixa” is committed to ensuring workplace health and safety and to preventing and minimising potential workplace risks. As such, it will establish a series of rules and measures that must be followed and implemented by all Affected Persons. “la Caixa” professionals and collaborators will receive training in workplace health and risk prevention at its various work centres, and the organisation will supply the equipment and resources they need to do their jobs correctly and safely.
Compliance with the code

All Affected Persons are required to read and abide by the contents of this Code. Respecting the values, principles and rules of the Code is an essential condition of their relationship with “la Caixa”.

Therefore, upon accepting a job or position at “la Caixa”, Affected Persons take responsibility for, with regard to their own conduct, respecting the laws, values, principles and rules of the Code and any other instructions issued by “la Caixa”, now or in the future. If any Affected Person should violate the Code, “la Caixa” reserves the right to take disciplinary measures, if necessary, in accordance with labour legislation, the disciplinary system established in the applicable collective bargaining agreement, and all other applicable regulations, considering the nature of the relationship between the Affected Person and “la Caixa”.

Affected Persons must cooperate with any investigation and internal or external audit conducted at or by “la Caixa”.

In addition to the stipulations of this Code, the conduct of Affected Persons must be guided by the principles of honesty, integrity and common sense.
What should I do if I see a conduct contrary to the Code of Ethics?

Reporting channels

To facilitate compliance with the Code, “la Caixa” has set up a confidential information and reporting channel that can be used to clarify doubts about the Code’s interpretation or practical application and report possible violations.

“la Caixa” has an Ethics Channel for communicating with the organisation, whose operating procedure is described in the internal regulations.

All communications, whatever their nature, will be handled in a rigorous, transparent, objective way, and the whistle-blower’s identity will be kept confidential at all times. “la Caixa” guarantees that whistle-blowers who submit queries or reports will not be subject to retaliation, as long as they are acting in good faith. Good faith is proved by providing evidence to support the claim that a violation has been or may be committed. In this respect, “la Caixa” constantly strives to adapt its reporting channels to current legislation and best practices.

If any Affected Person feels that s/he is facing retaliation after having submitted a query or report on a code violation in good faith, that person must immediately notify the “la Caixa” Ethics and Crime Prevention Committee.
Distribution of the Code of Ethics

The Code will be made available via the channels established for this purpose by “la Caixa”, and appropriate communication, training and awareness activities will be carried out to ensure that it is understood and put into practice across the entire organisation, thereby fostering a culture of compliance.