

*Code of
Ethics and
Principles
of Conduct*

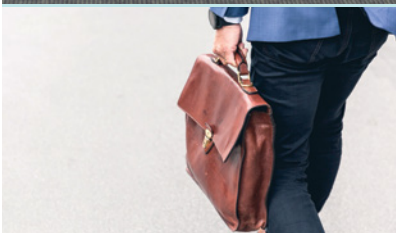
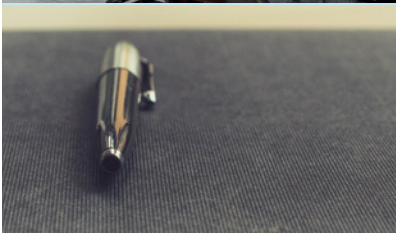


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Introduction

About Us

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Fundación Bancaria Caixa d'Estalvis i Pensions de Barcelona, "la Caixa" (hereafter "la Caixa" Foundation), is a **not-for-profit organisation that pursues activities of general interest**, primarily the promotion and implementation of social, charitable, welfare, research, educational and/or cultural initiatives.

▼
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.**



Introduction

The *Essence* of "la Caixa" Foundation

"la Caixa" Foundation 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" Foundation 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" Foundation 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

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"la Caixa" Foundation: Fundación Bancaria Caixa d'Estalvis i Pensions de Barcelona, "la Caixa"

The "la Caixa" Foundation Group: the companies and organisations in which Fundació Bancaria Caixa d'Estalvis i Pensions de Barcelona, "la Caixa" Foundation, has or may have a controlling interest.

Internal regulations: policies, rules, procedures, instructions and other internal documents adopted by "la Caixa" Foundation 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" Foundation, 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" Foundation Group, and whose actions may affect the organisation's ability to successfully implement its strategies and achieve its objectives.

Objectives and Scope of Application

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The **objectives** of this Code are as follows:



To establish the **fundamental ethical values and principles of conduct** for "la Caixa" Foundation, 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" Foundation, in all matters that concern them.



To **clearly convey the fact** that "la Caixa" Foundation 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" Foundation, i.e. employees, regardless of the nature of their contract with the organisation, executives and members of the Board of Trustees of "la Caixa" Foundation, with the aim of helping the entire organisation attain the highest standard of excellence through upright and ethical conduct.

Moreover, "la Caixa" Foundation will promote and encourage the application of the Code at all companies in the "la Caixa" Foundation 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” Foundation Board of *Trustees*

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

1. **Approving the ”la Caixa” Foundation Code of Ethics** and any substantial modifications made to it.
2. **Creating the ”la Caixa” Foundation Ethics and Crime Prevention Committee**, as well as approving and modifying, in any substantial aspects, the operating procedure of the ”la Caixa” Foundation Ethics and Crime Prevention Committee.



”la Caixa” Foundation *Ethics and Crime Prevention Committee*

The ”la Caixa” Foundation 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” Foundation 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 must:
 - operate independently and fairly,
 - respect the confidentiality of all information and to take actions to ensure that any 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" Foundation**, which guide and govern all the foundation's activities, are as follows:



Social commitment

As the vocation to act permanently at the service of society, paying special attention to the most vulnerable and adapting at all times to emerging challenges.



Responsibility

As the duty to ensure that the Institution's actions will be carried out according to criteria of excellent management and efficiency in achieving results.



Integrity

As the will to act in accordance with the ethical principles of respect, fairness and humanity.



Transparency

As the commitment to adopt an honest, clear attitude in all actions, fostering trust and credibility by means of independent, rigorous management.

PRINCIPLES OF CONDUCT

► How do we act?

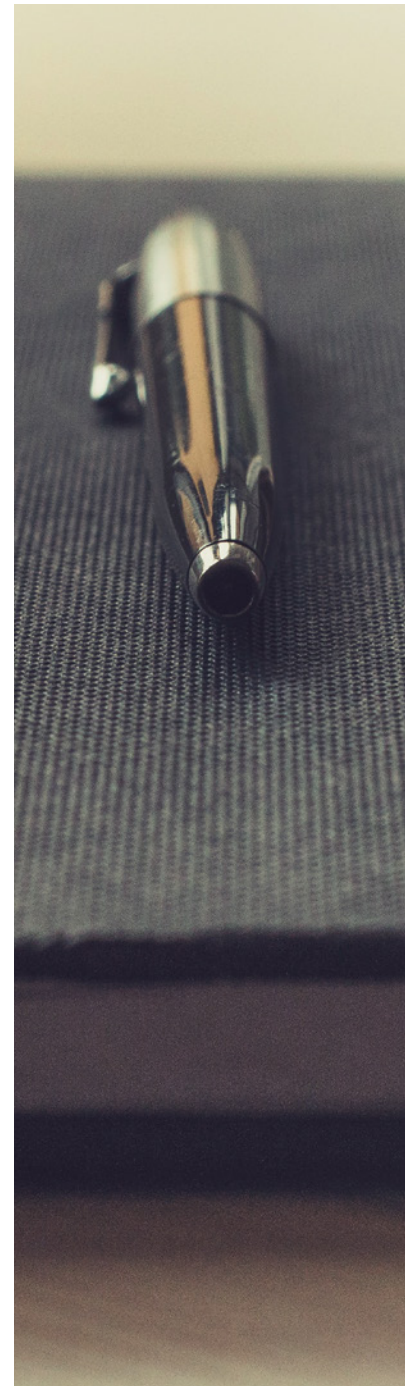
The principles of conduct at "la Caixa" Foundation which this Code endorses and explains in detail with a view to upholding the aforementioned values are:

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" Foundation 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" Foundation seeks to collaborate with third parties whose standards of conduct are similar to the values and principles of conduct set out in this Code.



1. Compliance with laws and regulations

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" Foundation.
- 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" Foundation in its contractual relationships with third parties.



Did you know that...?

"la Caixa" Foundation 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 personal gain, which could directly or indirectly benefit "la Caixa" Foundation. For this reason, "la Caixa" Foundation expects Affected Persons to act in a licit, ethical and professional manner at all times when carrying out their duties.

In this respect, and with regard to the management and operations of "la Caixa" Foundation, they must be especially vigilant in complying with the rules applicable to activities defined as criminal acts by the Spanish Criminal Code.

2. Integrity and transparency

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" Foundation will encourage the social organisations, partners and suppliers it works with to follow the same standards of conduct.

"la Caixa" Foundation 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" Foundation, 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" Foundation and are prohibited from using any information they may have about "la Caixa" Foundation for their own personal gain or for the benefit of third parties. They must act in the best interests of "la Caixa" Foundation at all times, remaining objective and uninfluenced by any private interests.

Affected Persons may not engage in professional activities outside the "la Caixa" Foundation Group that create a conflict with their activities inside the "la Caixa" Foundation 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" Foundation. Likewise, they may not offer gifts to third parties other than those of an institutional nature which are expressly sanctioned.

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



2.2. Transparency

For "la Caixa" Foundation, being transparent to society acts as a cornerstone for its activities.

"la Caixa" Foundation undertakes to provide its beneficiaries and partners with accurate and truthful information about its activities and its procedures for handling complaints and resolving incidents.

"la Caixa" Foundation 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" Foundation has mandatory internal regulations governing the purchase of goods and services, which establish the criteria and procedures for entering into contracts with third parties.

2.3. Processing information

"la Caixa" Foundation 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" Foundation:** All Affected Persons must





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

2.4. Protecting the assets of "la Caixa" Foundation

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

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

Rules regarding the use of resources, "la Caixa" Foundation computer security and software copyright 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" Foundation 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" Foundation 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" Foundation 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" Foundation in any way.

3. Corporate social and environmental responsibility

”la Caixa” Foundation 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” Foundation’s commitment to sustainability, its strategic programmes are aligned with the UN’s Sustainable Development Goals.

”la Caixa” Foundation 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” Foundation 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” Foundation **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” Foundation 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” Foundation 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” Foundation will maintain a working environment free from 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” Foundation is responsible for preventing it and, if necessary, taking disciplinary measures. In this respect, ”la Caixa” Foundation 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” Foundation 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.



4.3 Career training

”Ia Caixa” Foundation 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



”Ia Caixa” Foundation is committed to ensuring workplace health and safety and to preventing and minimising potential workplace risks. As such, it has established a series of rules and measures that must be followed and implemented by all Affected Persons. ”Ia Caixa” Foundation 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.

PRINCIPLES OF CONDUCT

5. Professionalism and teamwork

”Ia Caixa” Foundation believes that its staff and the values and principles that drive them are its most important asset. ”Ia Caixa” Foundation respects and promotes diversity, valuing each person’s unique skills and contributions. Working together, combining the individual strengths of each team member, always yields better results.



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" Foundation.

Therefore, upon accepting a job or position at "la Caixa" Foundation, and with regard to their own conduct, Affected Persons take responsibility for respecting the laws, values, principles and rules of the Code and any other instructions issued by "la Caixa" Foundation, now or in the future. If any Affected Person should violate the Code, "la Caixa" Foundation 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" Foundation.

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

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" Foundation 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" Foundation 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" Foundation 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" Foundation 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" Foundation 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" Foundation 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.



"la Caixa" Foundation

It's only progress if we all progress