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Human Rights Report

Interactive document

CaixaBank

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CaixaBank

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Message from the Chief Sustainability Officer

At CaixaBank, we maintain a firm commitment to respecting and promoting human rights, which are an essential pillar of our values and a cross-cutting commitment that drives the highest standards of conduct across all our activities. This commitment is articulated through our Human Rights Principles, aligned with the main international standards, which guide our relationship with employees, customers, shareholders, suppliers, business partners and the communities in which we operate.

Within this framework, we have a robust system of due diligence policies and processes that enables us to identify, prevent and mitigate potential human rights impacts across the entire value chain. This approach strengthens our responsibility as a financial institution and contributes to creating sustainable value for society as a whole.

We also promote a culture of respect for human rights throughout the organisation and work with our stakeholders to advance their protection, contributing to the development of responsible and sustainable financial activity.

With this report, we reaffirm our commitment to transparency, offering a clear view of our approach, the progress made and the challenges that still lie ahead in the field of human rights.

Eugenio Solla
Chief Sustainability Officer

Respect for and promotion of human rights are an essential pillar of our values and a cross-cutting commitment that drives the highest standards of conduct across all our activities

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Executive Summary

Strategy

- CaixaBank's Human Rights Principles set out the Bank's human rights commitments, in accordance with the highest international standards.
- Integration of Human Rights Promotion into the 2025-2027 Strategic Plan and the 2025-2027 Sustainability Plan, with the aim of reinforcing a differentiated ESG positioning.
- Definition of respect for human rights as an integral part of business activity and of the Bank's relationship with its employees, as a provider of financial services, with its suppliers and as part of the community.
- Consolidation of the corporate principles, policies and frameworks applicable to human rights, sustainability, ESG risks, ethical conduct and the supply chain.
- The Group's journey and main milestones in consolidating its human rights approach and management.

Governance

- **The Board of Directors** has ultimate responsibility for the 2025-2027 Sustainability Plan and for the approval and oversight of CaixaBank's Human Rights Principles.
- **Role of the Board committees** in the oversight of sustainability, risks, internal control and human rights-related information.
- **Involvement of the management bodies in the operational roll-out of the strategy**, overall risk management and the implementation of sustainability.
- **Integration of human rights into risk management**, specialised training and corporate culture.

Human rights due diligence and assessment process

- **Description of the human rights due diligence process** as a structured, continuous system aligned with the Group's risk management and control. The various stages of the process are covered: identification, assessment, integration and action (improvement opportunities), monitoring and measurement, communication and remediation.
- **Methodology for identifying and assessing risk events,** including impact, likelihood and prioritisation criteria.
- **Update of the exercise in 2026, with the main risks prioritised by area and the conclusions of the analysis.** Following this assessment process, it is concluded that CaixaBank integrates human rights considerations into its policies and management systems, identifies actual or potential negative human rights impacts, develops measures to stop, prevent or mitigate them, and monitors implementation and results.
- **Identification of improvement opportunities** to reinforce the integration and maturity of the model across the Human Rights Principles, both by block and on a cross-cutting basis.
- **Existence of monitoring, communication and remediation mechanisms** linked to the various areas of activity.

Partnerships, dialogue and stakeholder engagement

- **The CaixaBank Group's participation in external initiatives, commitments and frameworks** linked to human rights.
- **Summary of the main engagement** actions with stakeholders.

02 Introduction

SCOPE AND PERIMETER OF THE REPORT

This report draws on the Group's periodic human rights risk assessment processes

This report sets out the CaixaBank Group's (CaixaBank, S.A. and its subsidiaries) approach to and management of human rights, in accordance with CaixaBank's Human Rights Principles and other applicable codes and policies, and aims to provide a consolidated view of how the CaixaBank Group ('the Group') identifies, assesses and manages its main human rights risks and impacts in the course of its activity and its value chain. The scope of the report covers CaixaBank's own operations, as well as those activities, business relationships and areas of the business in which the Bank may cause impacts, contribute to them or be directly linked to them, including its activity as a provider of financial services, its supply chain and its relationship with communities. This framework is structured around four areas, in accordance with CaixaBank's Human Rights Principles: responsibility to its employees, as a financial provider, to its suppliers and as part of the community.

This report also draws on the periodic human rights due diligence processes carried out by the Group, which cover the Group's main activities and its relevant companies, including those that, where appropriate, have their own due diligence processes adapted to their operating context.

INTERNATIONAL NORMATIVE AND REGULATORY FRAMEWORKS OF REFERENCE FOR THIS REPORT

This report has been prepared on the basis of the main international standards on human rights and responsible business conduct. In particular, the report is aligned with the following international guidelines, which are also set out in **CaixaBank's Human Rights Principles**, updated in 2025:

- The **United Nations International Bill of Human Rights,** comprising the Universal Declaration of Human Rights (UN, 1948), the International Covenant on Civil and Political Rights (UN, 1966) and the International Covenant on Economic, Social and Cultural Rights (UN, 1966).

- The **Declaration of the International Labour Organization** (ILO) on fundamental principles and rights at work, together with its eleven fundamental Conventions – on freedom of association and collective bargaining, the elimination of forced labour, the abolition of child labour, non-discrimination in employment and the guarantee of safety and health conditions at work – establishes the essential international framework for the protection of labour rights.
- The **Charter of Fundamental Rights** of the European Union.
- The **Guiding Principles of the United Nations** on Business and Human Rights (UN, 2011).
- The **Guidelines of the Organisation for Economic Co-operation and Development** (OECD) for Multinational Enterprises (OECD, 2011).
- The **Global Compact** of the United Nations.
- The **Women's Empowerment Principles** of the United Nations.
- The **Equator Principles.**
- The **Principles for Responsible Banking** of the United Nations Environment Programme Finance Initiative (UNEP FI).
- The United Nations **Principles for Responsible Investment**.
- The **European Union Action Plan** on Human Rights and Democracy 2020-2024.
- The **Commitment to Financial Health and Inclusion** of the Principles for Responsible Banking.
- **United Nations Declaration** on the Rights of Indigenous Peoples.
- **Convention on the Rights of the Child.**
- **Declaration on Human Rights Defenders.**
- The **Convention on the Rights of Persons with Disabilities**.
- The **International Convention on the Elimination of All Forms of Racial Discrimination**.
- **Performance Standards of the International Finance Corporation** (IFC).
- The **Convention on the Elimination of All Forms of Discrimination against Women**.

- The **International Labour Organization Tripartite Declaration of Principles** concerning Multinational Enterprises and Social Policy.
- The **European Convention on Human Rights**.
- The **Guide to Human Rights Impact Assessment and Management** of the International Finance Corporation.

From a regulatory and reporting perspective, this report falls within the context of the European sustainability requirements, in particular the Corporate Sustainability Due Diligence Directive (CSDDD), the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). Requirements at national level have also been taken into account, such as Law 11/2018 on non-financial information and diversity. The content of this report is aligned with the information disclosed in the CaixaBank Group's Consolidated Management Report and on its corporate website.

THE CAIXABANK GROUP'S MAIN HUMAN RIGHTS MILESTONES

2005

Global Compact

Adherence to the **United Nations Global Compact**: CaixaBank (2005), VidaCaixa (2009), MicroBank (2009), CaixaBank AM (2011), Banco BPI (2020) and CaixaBank Tech (2024).

2006

Annual Sustainability Report

Publication of the **Annual Sustainability Report** (voluntary), reporting the evolution of sustainability commitments (last updated in 2026): VidaCaixa.

2007

MicroBank

Creation of **MicroBank** with a social mandate of financial inclusion to facilitate equitable access to financial services.

2009

PRI

Principles for Responsible Investment (PRI) VidaCaixa (2009), CaixaBank AM (2016).

2011

Code of Ethics

Approval of the **Code of Ethics** as a general framework of conduct and corporate principles (last updated in 2025): CaixaBank (2011), MicroBank (2012), VidaCaixa (2014), CaixaBank AM (2014), Banco BPI (2019), CPC (2019), CaixaBank Tech (2021), Imagin (2023).

Equality Plan

Approval of the **Equality Plan:** CaixaBank.

2012

Alliances with Social Organisations

Development of A**Alliances with Social Organisations** to support and assess beneficiaries, reinforcing the protection of vulnerable groups: MicroBank.

2014

Supplier Code of Conduct

Approval of the **Supplier Code of Conduct** establishing ethical and human rights standards in the supply chain (last updated in 2025): CaixaBank (2014), VidaCaixa (2014), CPC (2019), CaixaBank AM (2014), Banco BPI (2021), CaixaBank Tech (2023).

'Equality in the Company' distinction

Award of the **'Equality in the Company' distinction** granted by the Ministry of Equality (last renewed in 2022 and formally extended in April 2025, valid until April 2028): CPC.

2017

Human Rights Due Diligence

First **Human Rights Due Diligence** exercised by CaixaBank.

2018

UNEP-FI

Incorporation into **UNEP-FI:** CaixaBank (2018), Banco BPI (2023).

THE CAIXABANK GROUP'S MAIN HUMAN RIGHTS MILESTONES

2019

PRB

UNEP-FI Principles for Responsible Banking (PRB): CaixaBank.

Corporate Human Rights Policy

Approval of CaixaBank's first **Corporate Human Rights Policy** as a formal framework of commitments to the international standards in this field: CaixaBank, MicroBank, Banco BPI.

Purchasing Principles

Approval of the **Purchasing Principles**, integrating ethical, social and sustainability criteria into procurement processes (last updated in 2025): CaixaBank (2019), CPC (2019), Banco BPI (2021), CaixaBank Tech (2023).

Know the Chain

Adherence to the collaborative initiative **Know the Chain**, which focuses on respect for human rights in the supply chain: VidaCaixa.

2020

PSI

Adherence to the **Principles for Sustainable Insurance (PSI)**, the first principle has to do with the integration of ESG issues into the decision-making process: VidaCaixa.

Human Rights Due Diligence and Assessment

Update of CaixaBank's **Human Rights Due Diligence and Assessment** exercise in collaboration with an independent external party.

Equality Plan

Extension of CaixaBank's **Equality Plan** (signed with 100% of the trade union representation), broadening the commitments of the 2011 Equality Plan and incorporating a work-life balance protocol, a protocol for the prevention, handling and elimination of harassment, other conflict-resolution measures, and an equality protocol for unmarried and common-law couples (last updated in 2023 and extended until 2027).

Group companies with their own Equality Plan: VidaCaixa, CaixaBank AM, CPC, CaixaBank Tech, Imagin.

Group companies with a protocol for the prevention of workplace and sexual harassment: VidaCaixa, CaixaBank AM, CPC, CaixaBank Tech, Imagin, MicroBank, Banco BPI (Harassment Prevention and Response Policy).

2021

Votes Against Slavery

Adherence to the collaborative initiative ***Votes Against Slavery***, which engages with FTSE 350 companies on supply chain responsibility in terms of human rights compliance: VidaCaixa.

Sustainability Risk Integration Policy

Sustainability Risk Integration Policy: VidaCaixa.

PAI Statement

PAI Statement, including human rights indicators: VidaCaixa, CaixaBank AM.

Engagement Policy

Engagement Policy: VidaCaixa, CaixaBank AM.

THE CAIXABANK GROUP'S MAIN HUMAN RIGHTS MILESTONES

2022

Human Rights Principles

Approval of CaixaBank's **Human Rights Principles**, reinforcing the corporate approach and extending its application across the Group (replacing the previous corporate policy / last updated in 2025): CaixaBank, MicroBank, CaixaBank Tech, CaixaBank AM, VidaCaixa, Banco BPI, CPC, Imagin.

Principles of Action of the Corporate Sustainability/ ESG Risk Management Policy

Approval of the **Principles of Action of the Corporate Sustainability/ESG Risk Management Policy**, integrating ESG criteria into risk management (replacing the previous Environmental Risk Management Policy and the Corporate Defence Policy / last updated in 2026): CaixaBank, MicroBank, CaixaBank AM, VidaCaixa, Banco BPI, CPC.

Principles of Action on Sustainability

Approval of the **Principles of Action on Sustainability** (replacing the previous Corporate Sustainability/CSR Policy / last updated in 2025): CaixaBank, MicroBank, CaixaBank Tech, CaixaBank AM, VidaCaixa, CPC, Imagin.

2022–2024 Strategic Plan

2022-2024 Strategic Plan, defining the Group's strategic priorities, with sustainability as one of the strategic lines: CaixaBank, MicroBank, VidaCaixa, CaixaBank AM, Banco BPI.

2022-2024 Sustainability Plan

2022-2024 Sustainability Plan with sustainability objectives and lines of action: CaixaBank, MicroBank, VidaCaixa, CaixaBank AM, Banco BPI, CPC.

Adherence to ADVANCE

Adherence to ADVANCE, a collaborative initiative for the management of human rights and social issues: VidaCaixa, CaixaBank AM.

EFR

Compliance with the **Portuguese Diversity Charter and Family-Responsible Company (EFR) certification**: Banco BPI.

2023

Human Rights Due Diligence and Assessment

Update of the **CaixaBank Group Human Rights Due Diligence and Assessment exercise**, with the integration of the Group-wide vision, in collaboration with an independent external party: CaixaBank, VidaCaixa, CaixaBank AM, Banco BPI, CPC.

First Engagement Plan

First Engagement Plan: dialogue and voting actions with a specific focus on Human Rights and breaches of the main international standards: VidaCaixa, CaixaBank AM.

Controversies Group

Implementation of the **Controversies Group**, with monitoring of alerts: CaixaBank, CaixaBank AM, VidaCaixa, CPC, Banco BPI.

Annual report on dialogue and voting

Publication of the **2022 Annual Engagement and Voting Report**: CaixaBank AM.

THE CAIXABANK GROUP'S MAIN HUMAN RIGHTS MILESTONES

2024

Sustainability Master Plan

Sustainability Master Plan of CaixaBank Tech 2024-2027: CaixaBank Tech.

2025

2025-2027 Strategic Plan

2025-2027 Strategic Plan defining the Group's strategic priorities, with sustainability as one of the strategic lines: CaixaBank, MicroBank, CaixaBank AM, VidaCaixa, Banco BPI, CPC.

2025-2027 Sustainability Plan

2025-2027 Sustainability Plan with sustainability objectives and lines of action: CaixaBank,VidaCaixa, CaixaBank AM, MicroBank, Banco BPI, CPC.

2025-2027 Engagement Plan

2025-2027 Engagement Plan; the plan includes a specific Human Rights focus and breaches of the main international standards: VidaCaixa, CaixaBank AM.

2026

Human Rights Due Diligence and Assessment

Update of the **CaixaBank Group Human Rights Due Diligence and Assessment exercise** in collaboration with an independent external party: CaixaBank, VidaCaixa, CaixaBank AM, Banco BPI, CPC, MicroBank, CaixaBank Tech, Imagin.

Human Rights Report

Publication of the **CaixaBank Group Human Rights Report**: CaixaBank, MicroBank, CaixaBank Tech, VidaCaixa, CaixaBank AM,CPC, Banco BPI, Imagin.

Annual Sustainability Report

Publication of the **Annual Sustainability Report** (voluntary), reports the evolution of sustainability commitments: VidaCaixa.

4th Annual Engagement and Voting Report

Publication of the **4th Annual Engagement and Voting Report** corresponding to 2025: CaixaBank AM.

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Strategy

SUSTAINABILITY AT CAIXABANK

The CaixaBank Group, with sustainability as a cross-cutting pillar of its strategy, operates a model based on quality, proximity and specialisation. Its position as a leading bank enables it to play a key role in contributing to sustainable economic growth and financial inclusion of vulnerable groups and rural areas.

The Group faces the shared challenge of transforming the economy towards a more sustainable model, boosting competitiveness and growth while addressing global challenges such as climate change and inequality.

The Group's sustainability strategy is set out in the 2025-2027 Sustainability Plan, which forms part of the third strategic line of the Group's Strategic Plan, reflecting CaixaBank's aspiration to achieve a differentiated ESG positioning. The key elements of the Group's overall strategy, and specifically of the Group's Strategic Plan, are:

)1 **Accelerating growth** leveraging our strengths

)2 **Accelerating transformation** and investment in the business

)3 **Differential positioning** in sustainability

Moving towards a more sustainable economy

Supporting social and economic development

CaixaBank strengthens its commitment to sustainability through its financial activity, putting what it does best – banking – at the service of people. It also continues to support its customers in making their projects a reality, offering solutions that accelerate the economic transition and improve people's financial wellbeing throughout their lives.

This role is essential in channelling the investment needed for the transition and reflects the social value of banking. Under the new Sustainability Plan, **CaixaBank will mobilise €100 billion between 2025 and 2027** to build a greener economy and support the economic and social development of all people, financing renewable energy, clean mobility and efficient building projects; facilitating solutions that accelerate the decarbonisation of companies and households; promoting financial inclusion; supporting training and employment; and responding to the needs arising from increasing longevity.

The Group relies on ethical and responsible management, specialised teams and transparency in its actions, aspiring to be the benchmark financial group in sustainability, fulfilling its purpose of being close to people for everything that matters.

The Plan is structured around **two ambitions and five lines of work**, all with milestones for timing and achievement.

DETAILS OF THE 2025-2027 SUSTAINABILITY PLAN

SP 25-27

01 *Moving towards a more sustainable economy*

By investing in current and future transition solutions:

- Renewable energy
- Clean mobility
- Efficient building
- Industrial decarbonisation
- Sustainable intermediation

Driving the decarbonisation of the social and business fabric

- Credit portfolio *net-zero* by 2050 (companies and households)
- Supporting businesses (clients and issuers)

02 *Support the economic and social development of all people*

Strengthening social and financial inclusion

- Products and services for vulnerable groups
- Accessible finance and service in rural areas
- Financial education and health

Fostering employability and entrepreneurship

- Training for employment
- Support for entrepreneurs and the self-employed

Responding to increasing longevity

- Lifetime savings planning
- Financial and personal wellbeing of older people

OUR HUMAN RIGHTS RESPONSIBILITY

For the CaixaBank Group, respect for human rights is an integral part of its values and of the way it acts in conducting its business activity legitimately and, accordingly, under the framework of the **CaixaBank Human Rights Principles,** the process of human rights risk identification and due diligence is carried out.

The **Human Rights Principles** guide the Bank's interaction with employees, customers, shareholders, suppliers, business partners and communities, and apply across the entire organisation, including the Group's Governing Bodies and management.

The approval and roll-out of the due diligence process ensures that CaixaBank's corporate strategy is aligned with the principles and commitments adopted in the Bank's Human Rights Principles.

The **due diligence process** covers the aspects set out in the commitments defined in the **CaixaBank's Human Rights Principles** and is structured around the identification of risk events and potential human rights breaches, reflecting CaixaBank's responsibility to its employees, as a provider of financial services, to its suppliers and as part of the community.

The due diligence elements are also established to prevent, mitigate and explain how to address impacts previously identified in the Bank's own activity, in the supply chain and/or through other business relationships.

CaixaBank also takes into account listening and dialogue exercises with stakeholders relevant to the Bank, as well as the various mechanisms and communication channels established to detect possible alerts or breaches.

Against this backdrop, CaixaBank plans to advance progressively in integrating human rights impact assessment into certain corporate transactions, including mergers and acquisitions and business collaboration agreements.

For the CaixaBank Group, respect for human rights is an integral part of its values and the way it acts

CORPORATE PRINCIPLES AND POLICIES APPLICABLE TO HUMAN RIGHTS

CaixaBank has approved and publicly disclosed a series of principles, policies, procedures and commitments that act as corporate standards of conduct applicable to all its activity and direct operations and throughout its global value chain, and serve as the base perspective for interpreting this procedure.

CaixaBank's main frameworks related to Human Rights

Human Rights Principles

They reflect the Group's commitment to respect and promotion of human rights, aligned with international standards, and establish the foundations of the due diligence model.

Principles of Action on Sustainability

They embed respect for human rights as a cross-cutting pillar, incorporating ESG criteria into decision-making and risk management.

Principles of Action of the Corporate Sustainability/ ESG Risk Management Policy

They incorporate human rights into risk management, including analysis and exclusion criteria for activities or sectors with a higher risk of breaches.

Code of Ethics

It establishes the principles of conduct that guarantee respect for human rights in all the Group's actions and in its relations with third parties.

Purchasing Principles

They embed respect for human rights in the supply chain, promoting responsible practices in supplier selection and assessment.

Supplier Code of Conduct

It defines the minimum human rights standards required, including working conditions, non-discrimination and the prohibition of forced and child labour.

Other CaixaBank frameworks related to Human Rights

- General Principles of the Corporate Privacy and Personal Data Policy
- Principles of Action of the Information Security Policy
- Occupational Health and Safety Policy
- Healthy Organisation Policy
- Engagement Policy for discretionary portfolio management
- Corporate framework for integrating ESG risks into investment and asset management services
- Corporate Policy on the Internal Reporting System
- Policy on the selection, diversity and suitability assessment of directors, members of senior management and other key function holders of CaixaBank and its Group
- Principles of Action of the Corporate Criminal Compliance Policy
- Protocol for the prevention, handling and elimination of harassment, together with other conflict-resolution measures (mediation)
- Statement on Nature
- Statement on Climate Change
- Digital disconnection agreement
- Policy on the inclusion of people with disabilities

04 Governance

In line with CaixaBank's objective of being a benchmark in sustainability, responsible business management has been reinforced and progress has been made in integrating social and environmental criteria into its activity, ensuring best practice in internal control and good corporate governance.

This governance structure defines the objectives and general management guidelines with the aim of creating long-term value shared with the various stakeholders involved in the Group's activities. In addition, in line with its commitment to the environment in which it operates, **CaixaBank takes into account sustainability-related impacts, risks and opportunities, including those linked to human rights.**

HUMAN RIGHTS GOVERNANCE AT CAIXABANK

The CaixaBank Group's commitment to sustainability is backed by a solid governance structure with oversight by the Board of Directors

The Board of Directors (the 'Board') has ultimate responsibility for the approval, oversight and periodic assessment of the definition, development and implementation of the sustainability strategy, and for the approval and oversight of the general sustainability policies.

The Board has made sustainability one of the Group's strategic priorities and has approved the sustainability policies that define and establish the general principles and the management and control objectives and guidelines the Group must follow on sustainability.

In relation to the sustainability strategy, in October 2024 the Board approved a new Sustainability Plan for the 2025-2027 period. It also conveys its mandate across the entire organisation as the body ultimately responsible for overseeing sustainability-related impacts, risks and opportunities.

GOVERNING BODIES

BOARD OF DIRECTORS

AUDIT AND CONTROL COMMITTEE
Oversees the integrity of sustainability information and the effectiveness of internal control systems, including human rights-related information.

APPOINTMENTS AND SUSTAINABILITY COMMITTEE
Oversees compliance with the Bank's ESG policies and rules, including CaixaBank's Human Rights Principles.

RISKS COMMITTEE
Proposes the Group's risk policy, which includes ESG matters, to the Board and advises it on risk management and control, including risks associated with potential human rights breaches.

REMUNERATION COMMITTEE
Advises the Board on setting remuneration linked to ESG objectives.

{MANAGEMENT COMMITTEE
Develops the strategy and lines of action in the field of sustainability.

SUSTAINABILITY COMMITTEE
Ensures the successful implementation and promotion of the sustainability strategy within the Bank.

GLOBAL RISK COMMITTEE
Globally manages, controls and oversees the risks that the Group may incur.

MANAGEMENT BODIES

RISK MANAGEMENT

Establishment of the due diligence elements to prevent, mitigate and explain how to address impacts previously identified in the Bank's own activity, in the supply chain and/or through other business relationships.

HUMAN RIGHTS TRAINING AND CULTURE

The human rights culture is embedded in the Bank through **regular communications and training initiatives**. Employees whose roles have the greatest potential human rights impact (including the areas that manage project finance, labour relations and security, among others) receive specialised training.

To ensure the effective integration of environmental, social and governance (ESG) criteria into supply chain management, CaixaBank runs specific training programmes for its purchasing staff.

In 2025, the members of the purchasing team completed **the Human Rights training course 'Promoting decent work in business through the Labour Principles'** of the United Nations Global Compact and the 2030 Agenda, learning the Principles of the UN Global Compact and how to apply them in their day-to-day practice.

100%
Total number of employees in the purchasing team who have passed the training

Annual
Frequency

Human rights due diligence and assessment process

DUE DILIGENCE AT CAIXABANK

CaixaBank organises its human rights due diligence process as a structured, continuous system aligned with the Group's risk management and control processes, aimed at identifying, assessing, preventing, mitigating and, where appropriate, remedying adverse risk events affecting people arising from its activity and its value chain, including the community.

Due diligence is conducted on a three-yearly cycle, enabling systematic review of exposure to human rights risks and updates to the analysis in line with changes in the activity, the context and stakeholder expectations.

The approach is aligned with the **United Nations Guiding Principles on Business and Human Rights** and with the main international frameworks applicable to the financial sector detailed in the section **International normative and regulatory frameworks of reference for this report** of this report, and is based on the consideration of risk events, including those the Bank may cause directly, contribute to, or be linked to through its business relationships.?? Human rights due diligence is also aligned with the Group's ESG risk management system.

CaixaBank's human rights due diligence process applies to a broad perimeter covering both its own operations and the value chain. For analysis purposes, the Bank structures its approach around the stakeholder groups defined in the CaixaBank Group's Human Rights Principles, which reflect its commitments and principles of action:

01 **Responsibility to its employees**

02 **Responsibility as a provider of financial services,** which includes financing and investment activities, as well as responsible marketing

03 **Responsibility to its suppliers**[1]

04 **Responsibility as part of the community**

[1] Including consumer finance intermediaries.

In line with this approach, CaixaBank structures its human rights due diligence process through a set of control elements aimed at the appropriate management of the identified risk events. In particular, the Bank structures its analysis around specific processes associated with each of the above blocks, including people management and working conditions, responsible financing and investment, supplier qualification, assessment and monitoring processes, and product marketing and customer data protection.

In its most recent update, in 2026, the process broadened its scope to integrate all the Group's activities more systematically

The process also systematically integrates key control and management elements, such as the definition of responsibilities, management and monitoring mechanisms, training and awareness-raising, communication and complaint channels, and the adoption of mitigation and, where appropriate, remediation measures, together with reporting and participation in industry initiatives.

In its most recent update, in 2026, the process broadened its scope to integrate all the Group's activities more systematically, reinforcing the coherence of the model and capturing the operational particularities and specific risks associated with each of them. The exercise covers CaixaBank, S.A. and other Group entities, such as Banco Português de Investimento (BPI), CaixaBank Payments & Consumer (CPC), MicroBank, Imagin, CaixaBank Tech, VidaCaixa and CaixaBank AM.

At the same time, certain companies with distinctive characteristics maintain their own processes adapted to their operating context, in line with a model that combines corporate consistency with adaptation to the nature of each activity.

STAGES OF THE PROCESS

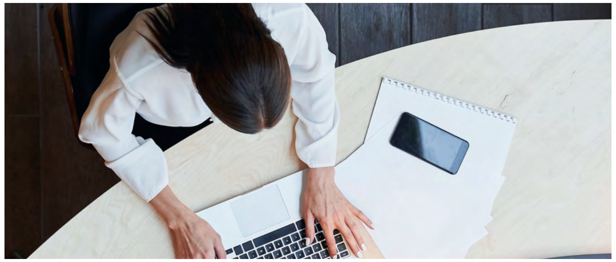
In summary, the CaixaBank Group's human rights due diligence and assessment process is structured around the following main stages:

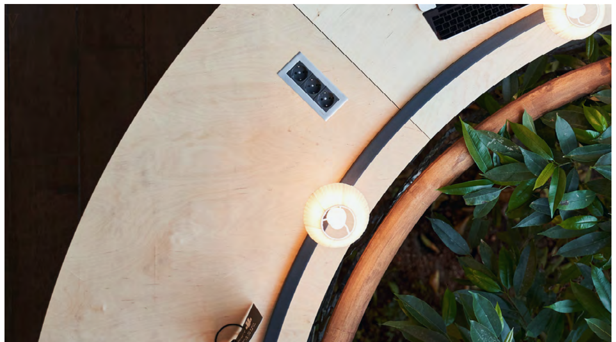
01 Identification

Systematic identification of human rights risk events and potentially affected groups, based on international reference standards and the commitments set out in CaixaBank's Human Rights Principles.

02 Assessment

Assessment of the identified risk events using homogeneous impact and probability criteria, with the aim of determining their severity and prioritisation. This analysis is complemented by the construction of human rights risk maps, which provide a structured view of the Bank's exposure across the various areas of activity.





03 Integration and action

Definition and integration of measures to prevent, mitigate and manage risk events, and incorporation of the results of the analysis into the Bank's internal processes. This process results in the definition of action and continuous improvement plans aimed at strengthening the due diligence system.

04 Monitoring and measurement

Continuous monitoring of the risks identified and the implementation of the measures adopted, through indicators and information systems integrated into the Group's ESG risk management framework.

05 Communication

Communication of the results of the due diligence process through corporate reporting channels, in line with regulatory requirements and stakeholders' transparency expectations.

06 Remediation

Activation of remediation and incident management mechanisms through the channels established by the Group, aimed at responding to possible human rights impacts, as detailed in this section of the report.

METHODOLOGY FOR IDENTIFYING AND ASSESSING RISK EVENTS

Identification

The due diligence process begins with the identification of human rights risk events and the affected groups, based on the international reference standards cited in the section **International normative and regulatory frameworks of reference for this report** and the commitments set out in the **Human Rights Principles of CaixaBank.**

As a starting point, the analysis draws on a reference framework of **37 human rights set out in the International Finance Corporation (IFC) Guide to Human Rights Impact Assessment and Management,** which makes it possible to structure risk identification homogeneously and ensure coverage of the main areas of potential impact.

This identification process takes into account various internal information sources and reference frameworks, with the aim of ensuring a comprehensive approach consistent with the Group's overall risk management system. In particular, it takes into account the CaixaBank Group's double materiality analysis, the ESG materiality assessment and the corporate risk map, as well as the European Banking Authority (EBA) Guidelines on the management of environmental, social and governance (ESG) risks.

In its most recent update, in 2026, this process identified a total of **50 risk events,** the assessment of which was underpinned by the analysis of **more than one hundred supporting documents and pieces of evidence,** as well as by interaction with the internal areas involved.

The analysis draws on a reference framework of 37 human rights set out in the International Finance Corporation's Guide to Human Rights Impact Assessment and Management

Based on this framework, the Bank identifies the risk events associated with its activity in four main areas:

Risks identified in relation to employees

Scope of risk events

- **Equal treatment in people management:** selection, recruitment, promotion, remuneration and departure processes.
- **Working conditions in accordance with the law:** work-life balance, working time, remuneration, work environment and health (including psychosocial risks).
- **Labour rights and freedoms:** freedom of association, collective bargaining and expression.
- **Working environment and workplace:** harassment, and safety, health and accessibility conditions.
- **Information security and data protection:** privacy and personal data processing, including the use of technological tools and artificial intelligence in people management.

Risks identified as a provider of financial services

Financing and investment

Scope of risk events:

- **Project and corporate financing:** exposure to activities and sectors with human rights risks.
- **Impacts on communities and territory:** effects on heritage, living conditions, displacement and access to resources.
- **Social risks associated with the financed activity:** including practices such as forced or child labour.
- **Environmental impacts arising from financing and investment:** environmental degradation, pollution and climate change.
- **Responsible investment and financing:** risk of involvement with activities that may breach human rights.

Responsible marketing

Scope of risk events:

- **Customer access and profile:** accessibility to financial services and prevention of exclusion.
- **Marketing of products and services:** appropriate design, communication and distribution, including marketing and advertising.
- **Customer protection:** suitability of products to customers' needs and capacity, and transparency of information.
- **Privacy and data processing:** protection of customer information and use of technological tools and artificial intelligence.

Risks identified in relation to suppliers

Scope of risk events:

- **Contracting and qualification processes:** equal treatment and non-discrimination in supplier selection and management.
- **Working conditions in the supply chain:** compliance with health, safety, labour rights and wage standards.
- **Respect for fundamental labour rights:** including freedom of association, collective bargaining and the absence of child or forced labour.
- **Supplier practices:** prevention of discriminatory conduct or harassment.
- **Environmental impacts associated with suppliers:** effects on the environment with an impact on people.
- **Intermediary onboarding processes:** application of objective and human rights criteria in their selection and assessment.

Risks identified as part of the community

Scope of risk events:

- **Impact of the activity on the environment:** social and environmental effects arising from the Bank's own activity and its financing activity.
- **Relationship with communities and territories:** impact on economic and social development.
- **Responsible conduct:** potential links to practices that may have negative effects on society or the environment.

Assessment

The assessment of the due diligence process is a key element in ensuring the adequacy and effectiveness of the measures adopted by the CaixaBank Group in managing human rights risks.

Risks are assessed using a methodology that combines impact and probability analysis, making it possible to determine the **severity of each risk event** (Impact x Probability).

Impact assessment

The impact is analysed on the basis of three variables used to estimate the severity of the potential harm:

INVOLVEMENT OF THE BANK

Degree of the Bank's responsibility for or connection with the risk event, based on its relationship with the activity that may generate the impact.

MAGNITUDE

Scale of the potential harm caused to people or the environment, from both a social and an environmental perspective.

REVERSIBILITY

Ability to restore the affected people or environment to a situation equivalent to that existing before the impact.

Assessment of probability

The probability of occurrence is determined from three variables that contextualise the risk:

COUNTRY

Socioeconomic context and human rights situation of the operating environment.

SECTOR

Main impacts of the sectors of activity linked to human rights breaches.

COVERAGE LEVEL

Susceptibility of the Bank to a risk event in terms of its preparedness to address it.

Based on this assessment, risk maps are constructed for the various areas of activity – employees, activity as a provider of financial services, suppliers and the community – applying homogeneous criteria that ensure the comparability and consistency of the analysis.

On a cross-cutting basis, the assessment incorporates country risk and sector risk analysis, in line with the Group's corporate ESG risk methodology and international reference frameworks. In certain areas, the analysis is complemented by specific variables – such as the distinction between financing and investment in the financial activity, or segmentation by supplier type – to adapt the assessment to the characteristics of each activity.

This approach provides a structured and comparable view of exposure to human rights risks, facilitating its integration into the Group's management and control processes.

The assessment of the due diligence process is a key element in ensuring the adequacy and effectiveness of the measures adopted in managing human rights risks. This exercise is structured as a process that verifies both the correct identification and prioritisation of risk events and the Bank's capacity to prevent, mitigate and manage those risks.

Prioritisation of risk events

CaixaBank has prioritised risk events in each area of activity according to their level of severity, taking into account the impact and probability variables.

The main risks identified are set out below, ordered from highest to lowest severity in each block.

Employees

- Inappropriate processing of employees' personal data, including improper access to digital information or social media, and the use of technological or artificial intelligence tools that may breach privacy.
- Damage and losses to company offices and branches due to third-party attacks.
- Cases of harassment on any grounds in the workplace.

Activity as a provider of financial services

Financing and investment

This block considers country risk and assesses all the mapped events, including those relating to controversial sectors included in the Sustainability/ESG Risk Management Policy, working conditions, local communities, child labour, forced labour and environmental impact.

Responsible marketing

- Offering products and services that are not suited to the customer's needs and/or profile, affecting rights such as access to housing, including the inadequate management of mortgage or foreclosure processes without exploring alternative solutions.
- Offering financial products that do not fit the profile, needs or payment capacity of customers, especially the most vulnerable, generating situations of over-indebtedness and loss of standard of living.
- Inappropriate processing of customers' personal information, for example through the use of artificial intelligence and automated decisions without proper verification.
- Failing to provide clear, sufficient and understandable information to customers, facilitating inappropriate commercial practices, pressure or incentives that may affect decision-making, lack of informed consent, or the use of technological tools that generate biased recommendations.
- Potential discrimination in access to financial products and services, arising both from human practices and from the use of technological systems, including algorithms and artificial intelligence.

Suppliers and intermediaries

- Contracting suppliers and collaborating with intermediaries that engage in discriminatory or harassment practices towards their workforce, including in access to employment, promotion, remuneration, working conditions or dismissal, and in merger or acquisition processes.
- Contracting suppliers and collaborating with intermediaries that engage in any form of modern slavery, such as forced or compulsory labour or the withholding of workers' documentation.
- Contracting suppliers and collaborating with intermediaries that do not pay their workers at least the statutory minimum wage, including living-wage considerations or measures to reduce the gender pay gap.
- Contracting of suppliers and collaboration with intermediaries who employ people below the minimum legal age or in forms of child labour, or who resort to irregular or undeclared employment, in breach of applicable labour legislation and ILO conventions.
- Contracting suppliers and collaborating with intermediaries that do not guarantee adequate occupational health and safety conditions, including the management of physical and psychosocial risks, compliance with the standards on working time and the rest periods established by the regulations.

Community

- Engaging in practices harmful to society and/or the environment that breach human rights or fail to contribute to the prosperity of local areas, whether through the Bank's own actions or in collaboration with third parties.

Main conclusions

Following an exhaustive assessment process based on direct consultation with the responsible areas and analysis of the Group's documentation, it is concluded that:

The CaixaBank Group **integrates human rights considerations** into its policies and management systems,

The CaixaBank Group **identifies actual or potential negative impacts** related to human rights

The CaixaBank Group develops **measures/actions to stop, prevent, or mitigate them**

The CaixaBank Group **monitors implementation and results**

Integration and action: improvement opportunities

As a result of the human rights due diligence assessment process, the CaixaBank Group has identified a series of improvement opportunities aimed at reinforcing the effectiveness, systematisation and integration of its management model.

These actions have been incorporated into specific action plans, in line with the Group's continuous improvement cycles, with the aim of continuing to advance the maturity of the system and its capacity to prevent and manage human rights risks. The action plans defined in the previous due diligence process for the period 2023-2026 have been implemented as planned.

The CaixaBank Group has identified a series of improvement opportunities aimed at reinforcing the effectiveness, systematisation and integration of its management model

Cross-cutting lines

- **Formalisation of a structured framework of human rights indicators,** aimed at continuous monitoring of the effectiveness of the due diligence process, enabling the evolution of risk and the effectiveness of measures to be tracked across the various areas of activity.

- **Systematic integration of human rights criteria into key processes and strategic decisions,** including corporate transactions (mergers, acquisitions, *joint ventures* or similar transactions), and in areas such as marketing, financing and supplier management.

- **Strengthening of the preventive approach through the operational integration of vulnerable groups,** advancing towards a homogeneous definition and its translation into controls, decision criteria and indicators in the relevant processes.

- **Development and consolidation of a structured human rights training pathway,** adapted to the various organisational levels and functions and integrated into the corporate training plan to reinforce its effective application in day-to-day operations.

- **Updating and strengthening the framework of human rights commitments and policies,** incorporating international standards and addressing emerging areas, such as digital rights.

- **Strengthening of governance frameworks in technology areas,** in particular artificial intelligence, ensuring the incorporation of criteria, controls and oversight mechanisms to identify, prevent and mitigate human rights risks.

Responsibility to its employees

- **Promotion of a balanced and co-responsible use of work-life balance measures,** assessing, where appropriate, possible actions to this end within the framework of the Equality Plan and its Monitoring Committee.

- **Strengthening of workplace wellbeing frameworks and practices,** including psychosocial risk management and mental health.

- **Promotion of diversity, equity and inclusion,** through the development or consolidation of policies, practices and mechanisms that foster equal opportunities.

- **Strengthening of the principles of accessibility and inclusion in the workplace,** promoting the adaptation of jobs to people's needs.

- **Development of listening and dialogue mechanisms with the workforce,** enabling their perceptions to be gathered systematically and improving decision-making in people management.

- **Progress in the integration of responsible remuneration criteria,** promoting a progressive evolution towards approaches aligned with the concept of a living wage.

Responsibility as a provider of financial services

Financing and investment

- **Deepening of the identification, assessment and management of social and governance risks associated with counterparties,** in line with regulatory expectations and ESG best practice.

- **Strengthening of traceability through the capture of additional information in financing transactions relating to the defence sector and/or high-risk countries.**

- **Integration of emerging risks into sector analyses;** for example, in the defence and security sector, new weapons-related technologies are included.

Responsible marketing

- **Integration of human rights criteria into customer relationships,** including equality, non-discrimination and attention to vulnerable groups at the various points of contact.

- **Strengthening of the responsible approach to the design, validation and marketing of products and services,** incorporating accessibility, inclusion and risk prevention criteria.

- **Promotion of training for customer-facing teams,** fostering appropriate service that is sensitive to customers' different needs.

- **Progress in the systematisation and traceability of the criteria applied in campaigns,** products and commercial processes, promoting their continuous assessment from a human rights perspective.

Responsibility to its suppliers and intermediaries

- **Strengthening of the integration of human rights criteria into third-party management,** including suppliers and intermediaries, throughout the entire relationship cycle.
- **Strengthening of third-party assessment, segmentation and monitoring mechanisms,** promoting risk-based approaches and homogeneous criteria.
- **Progress in the systematisation of controls, audits and monitoring processes,** with the aim of reinforcing the detection and management of possible risks and non-compliance.
- **Development and consolidation of structured frameworks for action in the event of non-compliance,** including remediation, monitoring and, where appropriate, termination of the relationship.
- **Promotion of awareness-raising, training and transparency on human rights towards third parties,** promoting their alignment with the Bank's standards.

Responsibility as part of the community

- **Strengthening of the strategic approach to social action,** promoting the incorporation of criteria to guide, prioritise and assess the impact of initiatives.
- **Progress in integrating a human rights perspective into social and environmental initiatives,** including the consideration of emerging areas and the needs of vulnerable groups.
- **Strengthening of the mechanisms for identifying, assessing and managing impacts on communities,** through more structured and homogeneous approaches.
- **Development of mechanisms for dialogue with communities and stakeholders,** favouring the integration of their expectations in decision-making.

Monitoring and measurement

The CaixaBank Group's human rights due diligence process incorporates a continuous improvement approach

The CaixaBank Group's human rights due diligence process incorporates a continuous improvement approach based on the periodic monitoring of risks, the review of controls and the updating of analyses in line with developments in the regulatory, social and sectoral context. Within this framework, the Bank has a system of indicators integrated into its corporate information systems that enables structured, periodic and traceable monitoring of the risks identified and of the effectiveness of the measures implemented, ensuring alignment with the Group's overall ESG risk management system.

Responsibility to employees

In this area, the Bank uses indicators to monitor compliance with the principles of equal treatment, working conditions, working environment and workforce wellbeing, including aspects linked to recruitment, representation, promotion, departures and the presence of women in positions of responsibility, as well as the application of work-life balance and flexibility measures. Indicators relating to occupational health and safety are also monitored, including harassment reports and their resolution, accident rates, absenteeism, training and risk prevention actions.

Responsibility as a provider of financial services

In relation to its financial activity, CaixaBank has indicators designed to assess the integration of ESG criteria – including human rights risks – into the processes of financing, investment and the marketing of products and services. In particular, it monitors aspects such as the incorporation of ESG criteria into transactions, the adoption of mitigation measures, exposure to risks and controversies, and the suitability of the product offering to customers' needs, the accessibility of financial services, customer protection, and privacy and personal data management.

Responsibility to suppliers and intermediaries

In supply chain management, CaixaBank monitors compliance with human rights standards through indicators relating to supplier qualification, risk identification and assessment, the incorporation of contractual requirements and monitoring of compliance with them. Aspects relating to transparency, the detection of reputational risks and the monitoring of incidents, audits and measures adopted are also tracked, strengthening the oversight of suppliers and intermediaries and anticipating potential risks.

Responsibility as part of the community

At community level, CaixaBank has indicators designed to measure the impact, scope and efficiency of its actions, including the identification of social needs, the selection and delivery of initiatives, the number of beneficiaries, the resources mobilised and the monitoring of results. This analysis is complemented by the use of communication and dialogue channels with stakeholders, which make it possible to identify potential impacts and activate remediation measures where appropriate.

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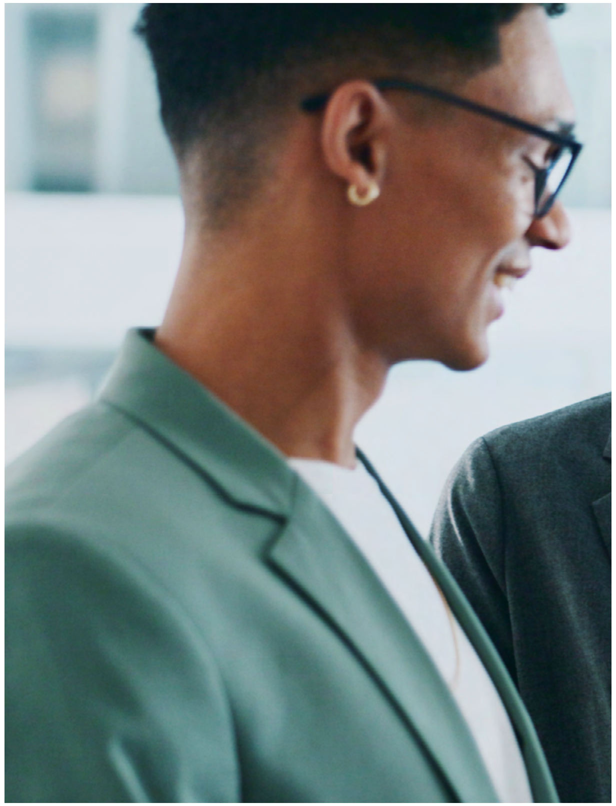
Communication

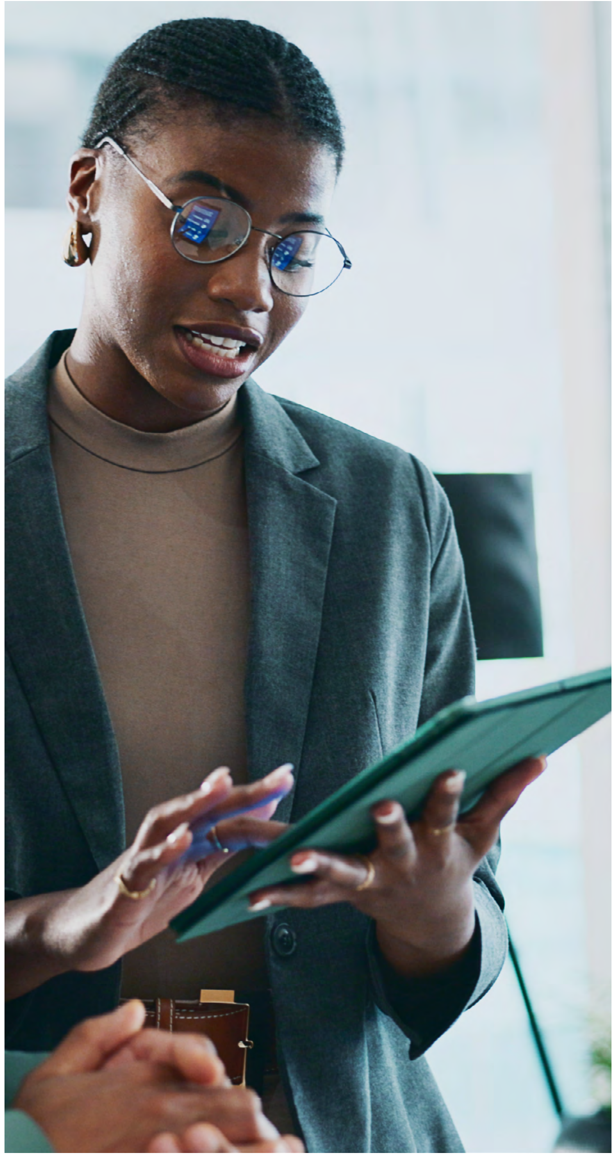
The CaixaBank Group communicates the results of the human rights due diligence process through its various corporate reporting channels, in line with regulatory requirements and its stakeholders' transparency expectations.

This communication takes the form of periodic reports that set out, in aggregate form, information on the main risks identified, their evolution, the measures adopted and the degree of progress of the defined action plans. This content is integrated into sustainability reports and other relevant corporate documents.

In addition, the Bank shares relevant information internally, facilitating the traceability of the results of the process and their incorporation into the operational management of the various areas. This flow of information helps to strengthen the integration of human rights risks into decision-making and control processes.

Communication is complemented by ongoing dialogue with stakeholders through various formal and informal channels, which make it possible to gather their expectations and perceptions and to strengthen the Group's transparency and accountability.





The CaixaBank Group reports on human rights impacts and risks, together with the corresponding mitigation and remediation measures, through its corporate reporting channels

Remediation

The CaixaBank Group has mechanisms for receiving, managing and resolving complaints that are integrated into its human rights due diligence system, in line with the international reference standards, which establish the need to guarantee access to effective remedy mechanisms.

RESPONSIBILITY TO ITS EMPLOYEES

- Whistleblowing Channel
- Protection of personal data, privacy and cybersecurity
- Reputational Risk Service (SARR)
- Channel for the Recognition and Support of Victims of Gender-Based and Sexual Violence
- Other communication channels (touchpoints, focus groups, etc.)

RESPONSIBILITY TO ITS SUPPLIERS

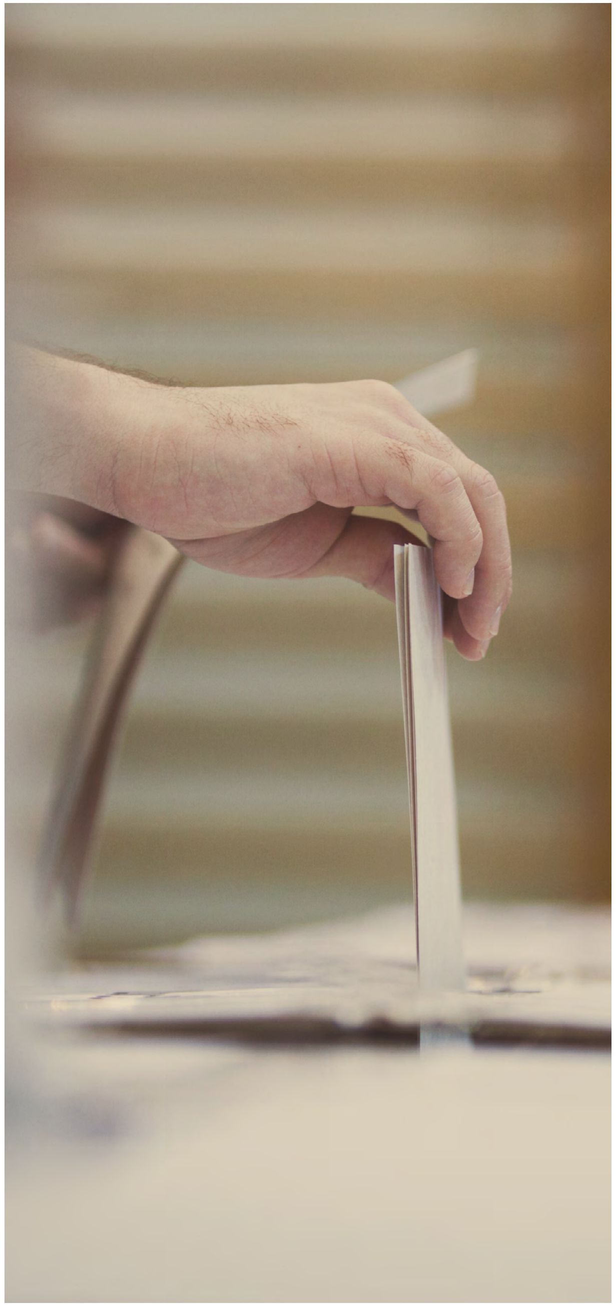
- Whistleblowing Channel
- Protection of personal data, privacy and cybersecurity
- Reputational Risk Service (SARR)
- Supplier Portal
- Supplier mailbox

RESPONSIBILITY AS A PROVIDER OF SERVICES, INCLUDING FINANCING AND INVESTMENT AND RESPONSIBLE MARKETING

- Whistleblowing Channel
- Protection of personal data, privacy and cybersecurity
- Reputational Risk Service (SARR)
- Principles of the Corporate Sustainability/ESG Risk Management Policy
- ESG controversy management
- Corporate Commercial Communication Policy
- Customer Care Service (SAC)
- Mortgage Customer Care Service (SACH)
- Support programmes for customers in vulnerable situations

RESPONSIBILITY AS PART OF THE COMMUNITY

- Whistleblowing Channel
- Protection of personal data, privacy and cybersecurity
- Reputational Risk Service (SARR)



The CaixaBank Group's **grievance and remediation mechanisms** incorporate elements aligned with the effectiveness criteria established by the **United Nations Guiding Principles on Business and Human Rights.**

Whistleblowing Channel

Responsibility to its employees, as a provider of financial services, to its suppliers and as part of the community

CaixaBank has a **Whistleblowing Channel** that complies with the regulations in force and with national and international best practice. This channel is designed to facilitate the confidential and swift communication of possible irregularities detected in the supply chain or in the course of professional activity that may constitute a criminal offence or a serious or very serious administrative offence, as provided for in Law 2/2023 of 20 February. The Channel's operation is periodically reviewed by Internal Audit and by independent external experts.

This channel handles different types of reports, including those relating to possible human rights breaches, such as breaches of the Code of Ethics; incidents relating to data protection, confidentiality and the ethical use of data; situations of workplace, sexual or sex-based harassment; matters relating to health and safety at work and occupational risk prevention; and conduct contrary to the anti-corruption policy.

The management of the Whistleblowing Channel is the responsibility of the Compliance Function, which follows a structured process covering various stages. The **Corporate Policy on the Internal Reporting System (SII)** and the **Information Management Procedure** also describe the framework for managing the reports registered in the Channel. This framework comprises various stages common to all communications, without prejudice to each case being managed individually.

CaixaBank has measures in place to guarantee the protection of whistleblowers and affected persons, set out in the Corporate Policy on the Internal Reporting System and in the Information Management Procedure.

To promote awareness and proper use of the Whistleblowing Channel, CaixaBank carries out ongoing training, dissemination and awareness-raising actions. These initiatives help to strengthen the culture of integrity and transparency and to ensure that the Group's people have sufficient information on how the Channel operates, its safeguards and the importance of using it when circumstances so require.

The Group has a **mandatory ethics and integrity training programme,** which includes a specific module on the internal reporting system and the whistleblowing channel, reaching **99.72% of the workforce** in 2025.

Reputational Risk Service (SARR)

Responsibility as a provider of financial services and to its suppliers

The **Reputational Risk Service (SARR)** is an internal service that contributes to compliance with the **Corporate Reputational Risk Management Policy,** providing support to the branch network and to other corporate departments and companies of the CaixaBank Group.

The SARR assesses the present or potential reputational impact associated with transactions or matters of various kinds (corporate, business, operational or people-related) that may have a material impact on the perception that the various stakeholders have of the CaixaBank Group.

The analysis draws on both in-house expert judgement and external tools provided by suppliers specialising in reputational risk analysis.

The SARR's activity is reported every six months to the Reputational Risk Committee.

In 2025, **547 queries were resolved,** of which **43.5% related to CABK's Corporate Sustainability/ESG Risk Management Policy,** which includes defence, the environment, energy and other ESG sectors, with the remainder relating to customers and transactions with potential reputational impact.

Protection of personal data, privacy and cybersecurity

Responsibility to its employees, as a provider of financial services, to its suppliers and as part of the community

CaixaBank establishes a **general framework for privacy management and the protection of personal data,** including data assets and artificial intelligence components, assuring stakeholders that the duties of supervision and control of its activity in relation to them are fulfilled.

This framework is articulated through the **Corporate Privacy Policy,** which sets out the general principles of privacy management, together with the governance framework and the management framework for data protection. The policy is corporate in scope and applies to all CaixaBank Group companies, setting out data protection risk and the ethical use of data and artificial intelligence components.

In the area of information security, the Group continues to **strengthen prevention, detection and response controls,** applying a methodology of continuous risk review and threat monitoring with the aim of preventing cyberattacks from materialising.

Channel for the Recognition and Support of Victims of Gender-Based and Sexual Violence

Responsibility to its employees

CaixaBank reaffirms its **commitment to women employees who are victims of gender-based or sexual violence,** providing them with a confidential channel for the recognition of their situation and access to the support measures provided by the Bank.

Other communication channels with employees

Responsibility to its employees

In addition, CaixaBank provides its employees with **various communication, participation and active listening channels** designed to gather their opinions, queries and suggestions and to foster internal dialogue and continuous improvement.

These channels include the **active listening model,** through surveys, *touchpoints* and *focus groups;* the joint committees with employee representatives and dialogue with trade union representatives; and other participation initiatives such as the Valora space, the Innova platform and the Conecta knowledge-sharing network.

Principles of the Corporate Sustainability/ESG Risk Management Policy

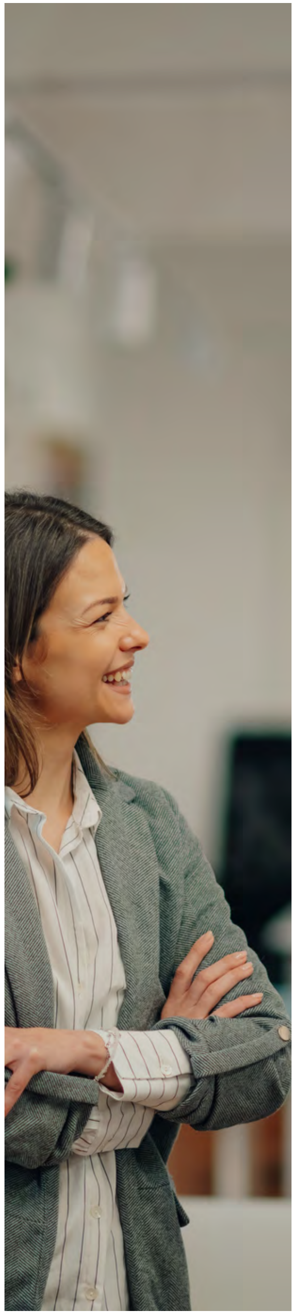
Responsibility as financial service providers

Within the framework of the **Principles of the Corporate Sustainability/ESG Risk Management Policy,** CaixaBank integrates environmental, social and governance criteria into its financing and investment decisions with the aim of identifying, measuring, managing and mitigating the risks associated with its activity.

The Group has a set of lines of action that guide the **management of ESG risks in its admission, monitoring and control processes,** most notably:

- Definition and management of an ESG risk management plan aligned with the Group's strategy.
- Implementation of a framework of granting and management policies that maintains a risk profile in line with that strategy.
- Integration of ESG risk analysis into customer assessment processes and financing and investment transactions.
- Monitoring of actions and transactions with a potential significant impact on ESG risks.
- Promotion of practices to mitigate the ESG risks assumed in the portfolios, and of actions aimed at reducing them.
- Development of systems for identifying, measuring and monitoring exposure to ESG risks, in line with regulatory developments and market best practice.
- Establishment of an organisational and governance framework that integrates ESG risk management within the business, risk and control functions, ensuring its adequate oversight.

Together, these lines of action make it possible to integrate ESG risk management into ordinary financing and investment decision-making processes, fostering management that is consistent with the Group's strategy and its risk profile.



ESG controversy management

Responsibility as financial service providers

CaixaBank has a **specific procedure for managing serious ESG controversies** associated with the Group's current or potential customers that may involve a breach of the Corporate Sustainability/ESG Risk Management Policy or other policies.

To this end, there is a **Working Group** delegated by the Sustainability Committee, made up of **ESG experts** and members of the **Reputational Risk Service,** whose role is to monitor, analyse and issue an opinion on the severity of ESG controversies.

This Group monitors and analyses all alerts regarding potential customer ESG controversies, which may come from both external and internal sources.

Following the analysis, the Working Group issues a decision or escalates it to the Sustainability Committee (or the Management Committee), depending on the severity of the controversy, and proposes response strategies for each of the Group's business areas with a position in the company involved in the controversy.

Corporate Commercial Communication Policy

Responsibility as financial service providers

CaixaBank guarantees **transparency in the advertising and information** it provides to customers before they take out products and services, aware of the impact that commercial communication has on their expectations and decisions.

To this end, the Group applies the principles set out in the **Corporate Commercial Communication Policy,** which establishes guidelines to ensure that advertising is lawful, clear, sufficient, objective, balanced and not misleading, in line with the risk appetite framework and the Corporate Risk Catalogue.

The Group has also voluntarily signed up to Autocontrol, the Association for Commercial Self-Regulation, in support of good advertising practice.

This policy defines the internal mechanisms and controls aimed at minimising the risks associated with advertising activity, including the formal procedures and requirements that the Group's advertising must meet. It is corporate in scope and applies to all CaixaBank Group companies.

Within this framework, communication management is organised professionally and centrally, through specific procedures and protocols, supported by an ongoing relationship with the media, the use of digital channels, and the monitoring, measurement and tracking of communication channels.

Customer Care Service (SAC)

Responsibility as financial service providers

The **Customer Care Service (SAC)** analyses and detects the origin of the dissatisfaction and complaints expressed by customers, with the aim of eliminating or mitigating their causes. Building on the resolution of individual cases, the SAC drives improvements that help to prevent the recurrence of incidents and foster the continuous improvement of the quality of the Group's products and services.

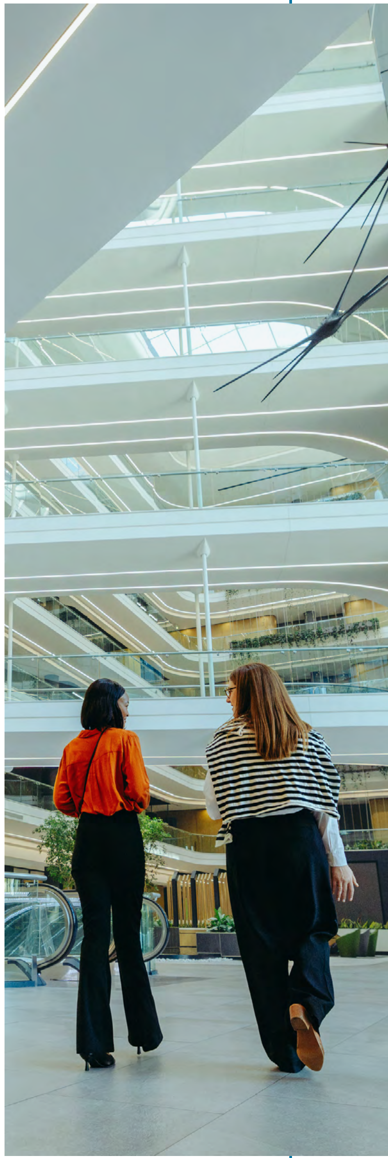
The SAC's activities are governed by the **CaixaBank Customer Protection Regulations.** These Regulations govern the SAC and the complaints-handling procedure, ensuring transparency, independence and the protection of users' rights, and establish deadlines, requirements and mechanisms for their resolution.

Complaints are handled by specialised teams capable of providing prompt, well-founded and transparent responses. The SAC is therefore geared towards **protecting customers' rights,** ensuring the proper handling and resolution of complaints and claims in accordance with the regulations in force and the criteria of the Banco de España, always acting with impartiality, autonomy and objectivity, analysing each case independently and applying good banking practice criteria.

The SAC also closely monitors new regulatory requirements and good banking practice criteria. These principles are disseminated internally through regular communications to the branch network and through the SAC's **advice to the Transparency Committee** in the approval process for new products and services. Its input aims to guarantee high standards of quality and transparency in the products and services approved.

In addition, the SAC makes it possible to identify inappropriate marketing practices by employees, or regulatory breaches, through the analysis of complaints submitted to the Customer Care Service and to the supervisors' complaints services, concerning customer protection and transparency in the information provided to customers.

The SAC submits an annual report to the Board of Directors explaining the performance of its function, including a statistical summary, a summary of the decisions issued, its general criteria and proposals for improvement. It also presents a half-yearly update on the status of complaints, and information on the evolution of complaint volumes and their handling is presented monthly to the Management Committee. Senior Management regularly monitors the evolution of the action plans and their effectiveness.



Customer Care Service (SAC)

Details and handling of the complaints received by the SAC[1]

2025

Type of complaint

Type of complaint	%
Asset transactions	33%
Cards and POS	29%
Other services	15%
Liability transactions	8%
Insurance and pension funds	6%
Channel	4%
Collection and payment services	4%
Investment services	1%

Average resolution time

Average resolution time	%
Less than 10 days	78%
10 – 30 days	20%
More than 30 days	2%

Resolution

Resolution	%
In favour of the complainant	44%
In favour of the Bank	35%
Not admitted	21%

[1] Excludes BPI and Credifimo

Mortgage Customer Care Service (SACH)

Responsibility as financial service providers

CaixaBank has set up the **Mortgage Customer Care Service (SACH),** a free telephone service for customers whose home is affected by a mortgage foreclosure claim.

Families thus have telephone support from specialists who help resolve queries about the stages of the claim and how it affects their main home.

752
Cases handled by the SACH in 2025

32,912
Since its launch in 2013

Support programmes for customers in vulnerable situations

Responsibility as financial service providers

The CaixaBank Group has a **social housing programme** with impact across Spain, aimed mainly at former debtors and tenants of the Group who are in a vulnerable situation and at risk of residential exclusion.

For all these people, rents are adapted to their ability to pay, with special consideration given to: families with a member with a disability, single-parent families with dependent children, families with minors, and household units that include a victim of gender-based violence or elderly people.

As part of the social housing programme, CaixaBank maintains its commitment to the Government's Social Housing Fund by making a total of 3,000 homes available. CaixaBank has also signed cooperation agreements with various public administrations on housing.

Communication and complaint channels with suppliers

Responsibility to its suppliers

CaixaBank maintains an **active dialogue with its suppliers through various channels,** such as the regular meetings held in service-provision review sessions, the supplier mailbox, the Supplier Portal, the consultation and reporting channel, audits and the annual supplier survey.

Within this framework, CaixaBank works to build and improve its relationship with suppliers, whom it considers true partners, promoting the development of best practices, innovation in various areas and the extension of its commitment to sustainability to the supply chain.

CaixaBank

06

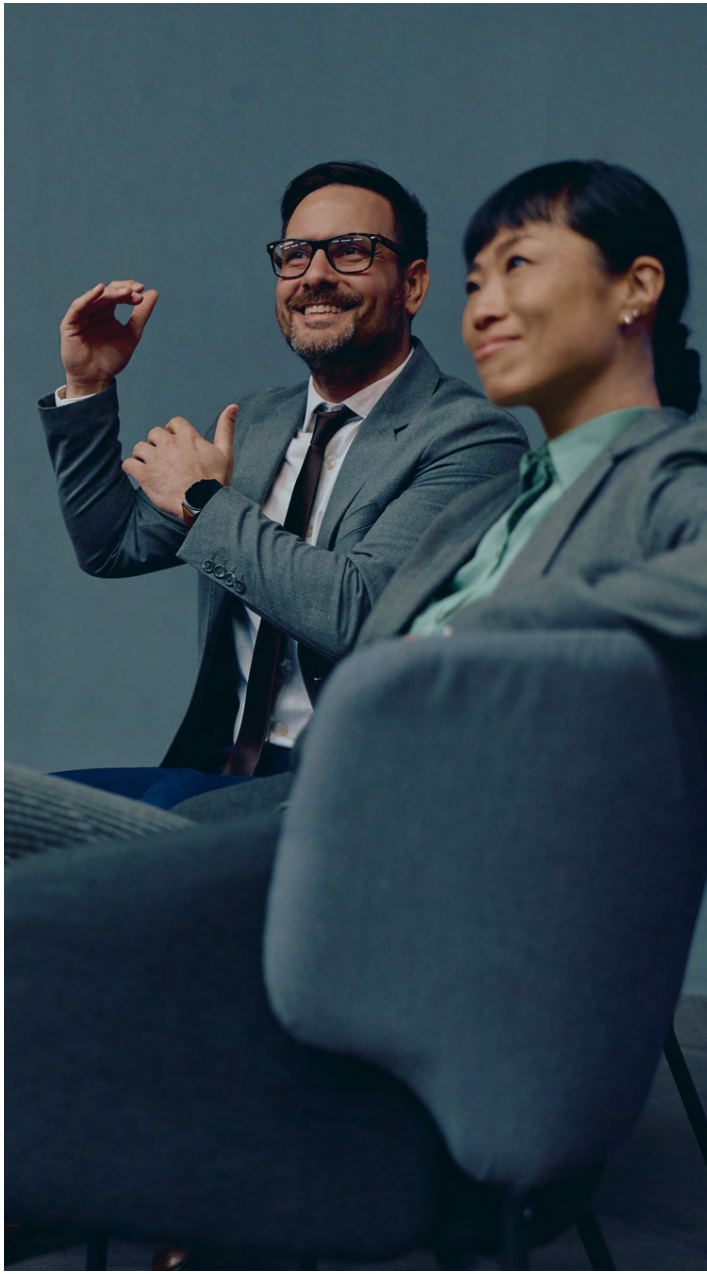
Partnerships, dialogue and stakeholder engagement

PARTNERSHIPS

To advance its commitment to sustainability and align itself with best practice, the CaixaBank Group takes part in numerous sustainability-related initiatives, specifically those linked to human rights, including:

- **United Nations Global Compact:** a UN international initiative. Participation in learning groups such as Human Rights, and training for the Group's suppliers: Sustainable Supplier Training Programme and submission of the annual progress report.
- **UNEP FI:** promotes sustainable finance and the integration of environmental and social aspects into the Bank's business.
- **Principles for Responsible Banking:** a voluntary initiative to promote the alignment of banks' activities with the SDGs and the Paris Agreement. Participation in working groups by the Bank.

- **Principles for Responsible Investment:** promote investment management based on environmental, social and good governance criteria. Investment activities are published annually.
- **Equator Principles:** a commitment to apply a voluntary risk management framework to identify, assess and manage environmental and social risk in project finance.
- **Collective Commitment to Financial Health and Inclusion:** an initiative to foster improved financial health and inclusion for customers and society at large. Participation in working groups to explore financial inclusion issues in greater depth.
- **Royal Spanish Academy and Pan-Hispanic Network for Clear and Accessible Language:** promoting clear and accessible language as a foundation of democratic values. Incorporating projects in favour of language accessibility.
- **Women in Banking:** the financial sector's benchmark for diversity and inclusion for women.
- **Women's Empowerment Principles:** principles promoted by the United Nations to advance gender equality and the empowerment of women in the workplace and the community.
- **Business Network for LGBTI Diversity and Inclusion (REDI):** a Spanish non-profit association that fosters an inclusive and respectful environment for LGBTI diversity in the workplace.



DIALOGUE AND ENGAGEMENT WITH STAKEHOLDERS

CaixaBank has established an **open and ongoing dialogue with all its stakeholders,** through meetings, surveys, round tables and conferences, among others. These interactions make it possible to gather valuable information that feeds into the Group's strategy, policies and risk management, and to understand the concerns of the main stakeholders and inform them of the Group's priorities.

By actively monitoring the environment and interacting with all the relevant stakeholders in the value chain, CaixaBank ensures that its strategy and business model are capable of responding appropriately to change.

An important part of this process is the integration of stakeholders' views into the assessment of the Group's impacts as part of the preparation of the Double Materiality Study. The **Double Materiality Study makes it possible to identify the material sustainability issues** that must be reported and on which the Group must prioritise its efforts.

The main engagement actions carried out with stakeholders[1] are summarised below:

REASON FOR ENGAGEMENT	COMMUNICATION CHANNELS	KEY ISSUES ADDRESSED IN 2025	ACTIONS CARRIED OUT
Customers Active engagement with customers makes it possible to understand their needs and anticipate market trends. Knowledge of their preferences allows CaixaBank to adapt products, services and distribution channels to their needs.	Interaction via surveys and focus groups. Branches The Net Promoter Score model enables more personal, omnichannel listening in real time. Customer Contact Center. Customer Care Service (SAC). Data Protection Officer (DPO). Sustainability meetings to support companies in their climate transition.	Security and data protection. Digital accessibility and an inclusive experience, in compliance with Directive (EU) 2016/2102 and UNE-EN301549:2022. Products and terms (interest rates and fees). Sustainable products and the transition to a sustainable economy. Omnichannel services and mobile banking.	Customer Service Improvement Plan (MAC Project). Providing rapid responses via the Contact Center or by email. Segmentation to offer more specialist advice. Global Reputation Index. Development and implementation of Directive (EU) 2016/2102. Monitoring of the evolution of NPS. Engagement on sustainability, to support companies in their climate transition. Simplified contracting and management processes.

REASON FOR ENGAGEMENT	COMMUNICATION CHANNELS	KEY ISSUES ADDRESSED IN 2025	ACTIONS CARRIED OUT
Employees CaixaBank promotes an open dialogue and bidirectional with its employees via listens it active to obtain the opinion of employees and carry out stock that they improve its well-being.	Study of Commitment, Culture and Leadership. You listen in moment of truth come. Internal consultation and reporting channels. Channel for the Recognition and Support of Victims of Gender-Based and Sexual Violence Corporate intranet "PeopleNow". The role of the Business Partner. Regular meetings between the Bank and workers' representatives. Employee support service (PregúntaME). Development and skills assessments.	Diversity and equality. Work-life balance. Career development and training plans. Remuneration. Employee benefits. Health, safety and wellbeing. Employee value proposition.	Plan Nosotros. Diversity promotion plan *Wengage*. Development by skills plan and training plan. 'Somos Saludables' Health and Wellbeing Plan. Attractive package of employee benefits, including flexible remuneration. New ways of working: remote working. Talent programmes. PregúntaME (employee support service).

[1]For the *engagement* actions with all stakeholder groups, see Informe-de-Gestion-2025.pdf.

REASON FOR ENGAGEMENT	COMMUNICATION CHANNELS	KEY ISSUES ADDRESSED IN 2025	ACTIONS CARRIED OUT
Suppliers CaixaBank works to build and improve its relationship with suppliers, whom it considers true partners. For this reason, it maintains an active dialogue with them, seeking to promote the development of best practices and innovation in various areas, and to extend its commitment to sustainability to its suppliers.	| Regular meetings in service-provision review sessions. | Mailbox of suppliers. | Annual survey to suppliers. | Supplier Portal. | Communication via the corporate negotiation and contract formalisation tool. | Consultation and reporting channel. | Supplier audits.	| Initiatives implemented to mitigate climate change. | Respect for Human Rights. | Working conditions of employees in the value chain. | Responsibility for sustainability.	| Action plans linked to audit results. | ESG supplier development plans. | ESG supplier training plans. | Incorporation of ESG criteria in tenders (ESG Index). | Controversies Committee.

REASON FOR ENGAGEMENT	COMMUNICATION CHANNELS	KEY ISSUES ADDRESSED IN 2025	ACTIONS CARRIED OUT
Communities and the third sector CaixaBank collaborates and maintains an open dialogue with the communities around it, especially third-sector organisations and NGOs, in order to obtain their perception of the most relevant issues and a guide to the matters of greatest relevance to society.	| Active dialogue and engagement actions via meetings and working sessions. | Participation in UNEP FI working groups and think tanks such as Spainsif. | Participation in thematic round tables organised by various NGOs. | Regular meetings with national foundations and other social organisations. | Surveys and focus groups with the main social organisations. | Branches	| Main social needs to be addressed. | Financial products and services to cover the needs of vulnerable groups. | Financial knowledge of the company. | Diversity and accessibility. | Economic growth of the territory.	| Social action plan to cover the more urgent needs. | Financial education plan. | Design of financial products and services for vulnerable groups. | Entrepreneurship financing and promotion. | Alliances with foundations and NGOs. | Radar ONG, with report analysis, feedback collection and implementation of improvements.

In addition, CaixaBank collaborates and maintains an active dialogue with another of the Bank's main ESG stakeholders — the leading NGOs and other organisations — with the aim of identifying the aspects they consider priorities and understanding their perception of the Bank's management in this area.

[1]These consultations include employees, retail and business customers, shareholders, investors and analysts, suppliers, regulators and institutions, the media, the third sector (NGOs), sustainability reference bodies, universities and society. For more information, see the Informe-de-Gestion-2025.pdf.

[2]Results of the CaixaBank S.A. Engagement Study

Main indicators of engagement with stakeholders in 2025

Consultation with the Group's stakeholders[1] (double materiality analysis)

2,409
Surveys
(no. of surveys)

28
Interviews
(no. of interviews)

4
Focus Groups
(Sessions)

Engagement with Employees[2]

57
Overall participation
(%)

73
Climate and commitment: total favourability
(%)

>50
Plan Nosotros
(no. of initiatives and improvement actions)

Engagement with Suppliers (no. of SMEs)

75
SMEs that have taken part in the 3rd edition of the Sustainable Supplier Training Programme

CaixaBank