



CaixaBank

Procurement Principles

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1	May 2019	Initial version
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1. 1. Introduction

1.1 Scope

The corporate Procurement Policy of CaixaBank, S.A. (hereinafter, “CaixaBank” or “the Company”) provides the general framework for activities related to the management of procurement and defines the model for relationships and contracting with suppliers.

The Procurement Policy of CaixaBank Group (hereinafter, “the Group”) is structured around general principles of activity that aim to promote commercial relationships based on compliance with prevailing laws and regulations, respect, integrity, transparency, excellence, professionalism, confidentiality and social responsibility. It also aims to foster collaboration with suppliers that share CaixaBank’s commitment and values..

1.2 Purpose

At CaixaBank we work constantly to build and improve our relationship with suppliers. As part of its objective of creating value for the Group, the corporate purchasing function is responsible for aligning purchasing objectives with business strategy, and for providing the necessary goods and services in a responsible and sustainable manner. These must be delivered within the necessary timeframe, in the right quantity and quality, at the lowest total cost, and with minimal risk to our business. This is to be done according to uniform criteria across all companies within the CaixaBank Group.

CaixaBank has established the Procurement Principles as a balanced collaboration framework between CaixaBank and its suppliers that promotes stable business relationships in keeping with our values.

| 2. Scope of application

The Procurement Principles are corporate in nature and apply to CaixaBank's suppliers, as well as to the suppliers of CaixaBank Group companies that follow the same procurement management model. They also apply to the employees, executives, and members of CaixaBank's governing bodies who are involved, at any stage, in the evaluation, negotiation, or contracting of goods and services from suppliers.

Notwithstanding the above, to facilitate following the Procurement Principles, only CaixaBank, the Group's parent company, shall be mentioned.

These general principles of activity aim to promote commercial relationships based on compliance with prevailing laws and regulations, respect, integrity, transparency, professionalism, confidentiality and social responsibility. They also aim to foster collaboration with suppliers that share CaixaBank's commitment and values.

The principles contained here will conform to and be coherent with the principle of proportionality, which is why, in applying them, the size, internal organisation, nature, scale and complexity of the activities carried out by the suppliers providing their services must be taken into account.



3. General principles for procurement management

We promote complying with the following principles when engaging in business relationships with suppliers:

Professionalism and continuous improvement

- Act in accordance with national and international procurement standards, guided by best business practices, unifying working procedures and establishing the criteria for action to achieve excellence in management. Complying with this will generate value for the entity, and will guarantee that its procurement activity respects environmental, ethical and social issues, ensuring innovation and continuous improvement.

Planning and efficiency

- Plan procurement activity fostering proactivity as the guiding principle of its activity, to ensure the best results are achieved.
- Seek efficiency in the procurement of goods and services, complying with the principles of need and suitability in all spending, considering quality, sustainability, innovation and potential risks.
- Optimise the processes and minimise the risks derived from procurement decisions through standardisation and centralisation of the procurement function, and the establishment of a single procurement procedure for all Group companies.

Ethics, integrity and transparency

- Guarantee transparency, independence and management of conflicts of interest in the selection of suppliers, with mechanisms to standardise and automate procurement processes and procedures that regulate decision-making in a hierarchical way, with knowledge of the levels in the system of powers and delegations. Conflicts of interest will be managed in accordance with the Conflicts of Interest Policy.
- Act ethically and responsibly in accordance with the CaixaBank Code of Ethics and regulations relating to procurement.
- Ensure compliance with prevailing laws in all areas of action. The general contracting terms and conditions will not include clauses that are in bad faith or that represent an unfair balance between the rights and obligations of CaixaBank and the supplier.

Equal opportunities

- Promote the interest of suppliers in contracting procedures to ensure the process is in accordance with the principle of fair competition, guaranteeing the best possible outcome for CaixaBank.
- Foster the diversification of business among various local, national and international suppliers, to contribute to the balanced distribution of wealth and equal opportunities.
- Ensure objectivity in decision-making. All contracting shall involve the application of objective, transparent, sustainable, ethical, considered and auditable criteria.

Dialogue, cooperation and sustainability

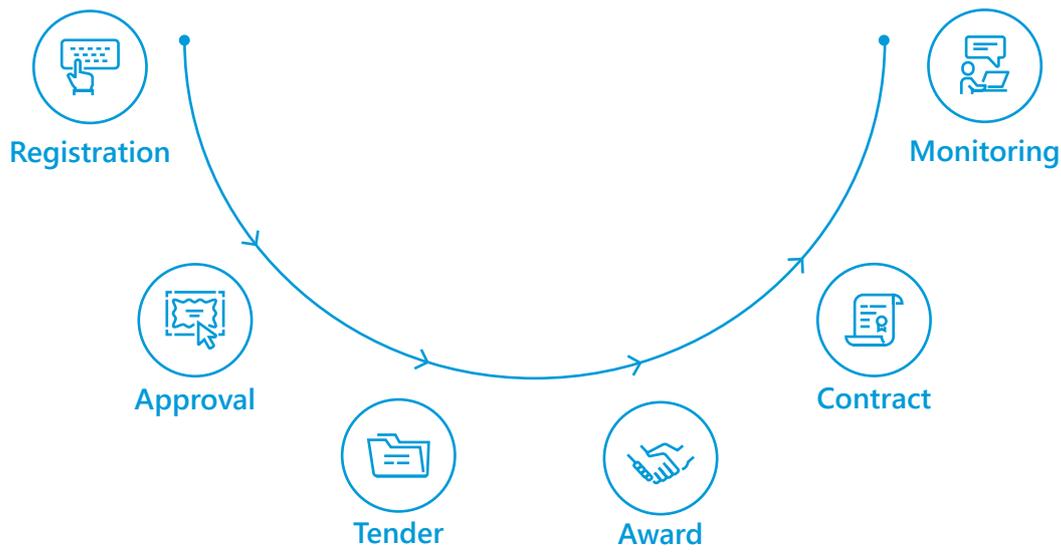
- Promote and maintain ongoing dialogue, and close and trusting relationships, with suppliers.
- Provide suppliers with communication channels to handle their enquiries, complaints and suggestions.
- Promote, raise awareness and train suppliers to ensure knowledge of CaixaBank's policies and principles, and foster their commitment by including ESG criteria in procurement processes.

Commitment and promotion

- Assess the performance of suppliers and their activity as suppliers of goods and services, and their ethical, social and environmental commitment.
- Avoid contracting with suppliers involved in known legal, tax, employment, human rights or corruption breaches.
- Promote contracting with suppliers that ensure respect for human and labour rights in their activities, apply best social, environmental, and corporate governance practices, and work to extend these throughout the value chain.
- Monitor environmental and social risks, especially with regard to human rights, to verify compliance with commitments to responsible management.

| 4. Our procurement process

Our procurement model comprises registering and approving suppliers, negotiating, awarding, communicating the procurement process decision to participating suppliers, arranging the contract with the awarded supplier and monitoring.



4.1 Registration and approval

CaixaBank has a supplier approval procedure. This process is carried out through the supplier signing up and registering on the CaixaBank Suppliers Web portal with the aim of guaranteeing the transparency and traceability of the process.

CaixaBank is willing to ensure that suppliers with whom they have contractual relationships respect the Supplier Code of Conduct. Guidelines of conduct are defined in this Code that the companies working as suppliers will follow in relation to complying with prevailing legislation, ethical behaviour and measures against bribery and corruption, safety and the environment and confidentiality.

This Code of Conduct is available to suppliers in the Supplier Portal and on the CaixaBank corporate website.

4.2 Negotiating, awarding and arranging the contract

CaixaBank will communicate to the bidding suppliers the technical and commercial specifications required for the provision of services or the purchase of goods.

In the case of outsourcing, CaixaBank will communicate the measures to take into account after the risk analysis has been conducted by the company.

Once the process of receiving, assessing, approving the risks associated to the service (when applicable) and awarding is completed, the contract will be signed by both parties. Any business relationship with our suppliers will be protected by the corresponding contract, guaranteeing that the negotiated conditions are duly collected.

4.3 Monitoring

CaixaBank will be able to audit and carry out performance evaluations of the supplier in order to ensure that the processes, supplied products and services match the requirements, while determining the controls to apply, where applicable.

Non-compliance with the content of the Supplier Code of Conduct may be the reason for the contractual relationships with any supplier being terminated early. This aspect will be included in the corresponding contract with the supplier.