Slavery and Human Trafficking Statement 2025

This statement is published on behalf of CaixaBank S.A. pursuant to Section 54(1) of the Modern Slavery Act 2015 in respect of the financial year ended 31 December 2025. References to "CaixaBank," "we," "us," "our" or the "firm" are to CaixaBank S.A.

This statement describes the measures taken by CaixaBank to mitigate the risk of slavery and human trafficking, within our business or our supply chain for the financial year ended 31 December 2025.

This statement is published on CaixaBank's UK website (link here).

About CaixaBank

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

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

CaixaBank has a branch in the United Kingdom and is registered with Companies House, with company no FC032858 and UK establishment no BR017941. The registered office is at 23rd Floor, 20 Fenchurch Street, London, EC3M 3BY. It is authorized by the European Central Bank (National Bank of Spain) and in addition, its UK regulated activities are subject to supervision by the Prudential Regulation Authority and the Financial Conduct Authority. Details regarding the scope of CaixaBank S.A.'s regulatory permission given by the Prudential Regulation Authority and Financial Conduct Authority are available online through the FCA's Financial Services Register.

Organization

As of 31 December 2025, CaixaBank has 47,120 employees, more than 20.7 million customers and 4,552 branches, mainly within Spain and Portugal. It is one of the leading financial service providers in that region.

CaixaBank, a listed company, is neither controlled nor has a dominant influence exerted on it by any other person or company. CaixaBank's biggest shareholder is CriteriaCaixa, S.A.U, as a consequence of certain reorganization proceedings. CriteriaCaixa, S.A.U. has a direct shareholding in CaixaBank (and indirectly by "la Caixa" Banking Foundation) of 31.26% and it acts as a holding company, being a wholly owned subsidiary of the Fundación Bancaria Caja de Ahorros y Pensiones de Barcelona, “la Caixa”. The Spanish banking executive resolution authority named “Fondo de Reestructuración Ordenada Bancario” or FROB (via its subsidiary BFA Tenedora de Acciones, S.A.) has an indirect 18.08% shareholding in CaixaBank and BlackRock, Inc. has an indirect 4.72% shareholding in CaixaBank. The remaining share capital of CaixaBank is primarily held by way of free float capital being 45.67% and the remaining percentage held by CaixaBank as treasury stock and by CaixaBank's Board members.

Commitments and Policies

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

- **Principles of Human Rights at CaixaBank Policy:** makes explicit our commitment to operate within a culture of respect for human rights and expects its employees, other stakeholders directly associated with its operations, products and services to follow suit. For CaixaBank, respect for human rights is an intrinsic part of its values and a minimum benchmark for the legitimacy of its business activities. This Policy confirms our commitment in respect of the Core International Rights Treaties of the United Nations, the International Labour Organisation's Declaration on the Fundamental Principles and Rights at Work and the EU Charter of Fundamental Rights. CaixaBank also pledges to carry on its business in strict compliance with applicable law and regulations and in accordance with the highest standard of ethics and professional conduct. Namely:

    - The United Nations International Bill of Human Rights (that includes (i) the Universal Declaration of Human Rihgts, (ii) the International Covenant on Political and Civil Rights and (iii) the International Covenant on Economic, Social and Cultural Rights);
    - The International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the eleven Core Conventions established by it;
    - The EU Charter of Fundamental Rights;
    - The Guiding Principles on Business and Human Rights of the United Nations;
    - The OECD Guidelines for Multinational Enterprises;
    - The United Nations Global Compact;
    - The UN Women’s Empowerment Principles;
    - The Equator Principles;
    - Principles of 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 Responsible Banking Principles;
    - 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;
    - The International Finance Corporation Performance Standards;
    - The Convention on the Elimination of all Forms of Discrimination Against Women;
    - The International Labour Organisation Tripartite Declaration on Principles concerning Multinational Entreprises and Social Policy ;
    - The European Convention on Human Rights; and
    - The Finance Corporation’s Human Rights Impact Assessment and Management Toolkit.

Principles of Human Rights at CaixaBank (July 2025): Principles_of_Human_Rights_at_CaixaBank.pdf

- In July 2023, CaixaBank carried out its third Human Rights due diligence and assessment exercise, considering these emerging regulations and the other valuable requirements for its key stakeholders. This process confirmed that CaixaBank's maturity in the protection and respect for Human Rights is high and meets the commitments defined in the Principles of Human Rights at CaixaBank with respect to both stakeholders and its value chain.

Summary of Due Diligence Process and Human Rights Assessment (July 2023): *Resumen*_CaixaBank_DD_DDHH_250723_EN.pdf

- **Code of Ethics:**

The corporate culture is reflected in the CaixaBank Group's Code of Ethics. The Code of Ethics includes the ethical values and principles that inspire the actions of everyone in the CaixaBank Group. It is the highest internal standard, and, as such, it is mandatory for everyone part of the Group.

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

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

We only engage suppliers who operate in accordance with best practice in ethical, social and environmental issues, as well as good corporate governance. In turn, suppliers shall respect fundamental human and labour rights when undertaking their business and work to spread them across their value chain. We complete due diligence checks on all of our suppliers before they are onboarded and review all contractual documentation to ensure CaixaBank policies and standards shall be met.

The values and principles set out in the Code of Ethics are passed on to CaixaBank Group suppliers through the Supplier Code of Conduct, which disseminates and promotes the values and principles of actions in our suppliers' activities, as well as to third parties whose contractual relationship requires compliance with them.

CaixaBank Code of Ethics (January 2025): Codigo_Etico_ENG.pdf (caixabank.com)

- **Action Principles of Corporate Criminal Compliance Policy:**

The Action Principles of Corporate Criminal Compliance Policy is the reference framework for the CaixaBank Group's crime prevention and management programme. This programme, which aims to reinforce the organisation, management, and control model, covers CaixaBank's Crime Prevention Model phases of (i) prevention, (ii) detection, (iii) response, (iv) reporting and (v) monitoring, and is aligned with the national and international standards on criminal liability (UNE/ISO Standards on Criminal Compliance Management Systems and Anti-Bribery Management Systems).

The objectives of the General Principles detailed in the Policy, are:

I. to convey to all employees, executives and members of the board at CaixaBank and its subsidiaries that constitute a relevant perimeter as detailed by CaixaBank, as well as any associated persons who are related to it, the commitment of CaixaBank's to ensure that their activity is based on respect for the laws and regulations in force at all times, as well as in the promotion and defence of their corporate values and business conduct as set out in the Code of Ethics. In addition, to ratify their strict compliant compliance on matters relating to crime prevention;

II. to establish a general framework for the Crime Prevention Model, adapting it to the new regulatory provisions. The Crime Prevention Model comprises of a set of measures aimed at preventing, detecting and responding to criminal behaviour and identifying the associated criminal risks and controls implemented to mitigate them; and

III. to assure shareholders, customers, suppliers, legal bodies and society in general that the CaixaBank Group complies with its duties of supervision and control of its business, establishing appropriate measures to prevent or reduce the risk of crimes ensuring that the due controls are implemented for directors, executives, employees and other associated parties.

In addition, this Policy describes the different criminal offences for which legal persons in Spain may be found liable in accordance with the Spanish Criminal Code, describing those crimes that are more likely to be committed at CaixaBank, due to its corporate purpose and its typical business activities as a financial institution engaged primarily in the provision of financing and investment services within the retail and corporate banking segments.

The principles that govern the General Principles and Crime Prevention Model are the general crime risk management principles. To summarise, these principles are based on an adherence to act in accordance with legislation in force, the Code of Ethics, the applicable rules of conduct, as well as other internal regulations. The principles champion a corporate culture of crime prevention and to ensure that there are appropriate resources and training available to investigate, as soon as possible, any events or situations that could be presumed to be criminal and ensuring the awareness of disciplinary procedures and sanctions are in place to respond to non-compliance.

Action principles of the corporate criminal compliance policy (December 2025): *Politica_Penal_web_eng.pdf*

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

  The General Principles of Corporate Anti-Corruption Policy complements the Code of Ethics and underlines the total rejection of any conduct that may be directly or indirectly related to corruption. It works under the basic principle of compliance with the laws and regulations in force at any given time, and it bases its action on the highest standards of responsibility. As a signatory to the UN Global Compact, CaixaBank undertakes to fulfil the 10 Principles, and in particular to fight against corruption in all its forms, such as extortion and bribery (Principle No. 10).

  In that sense, the General Principles are an essential tool to prevent the CaixaBank Group companies and its external collaborators from engaging directly, or through intermediaries, in conduct that may be against the law or the core business principles of CaixaBank: respect, integrity, transparency, excellence, professionalism, confidentiality, and social responsibility. CaixaBank takes an active position in rejecting all forms of corruption in all the markets where it operates.

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

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

General Principles of Corporate Anti-Corruption Policy (December 2024): 2024 Corporate Anti-Corruption Policy

- **Supplier Portal:** For Suppliers' used by CaixaBank in Spain, CaixaBank provides an online portal for Suppliers under which they can register to provide services to CaixaBank, negotiate supply contracts and send invoices. The portal prominently displays links to relevant CaixaBank policies, including: (a) the Supplier Code of Conduct; (b) Procurement Principles; and (c) a Human Rights Awareness presentation. For Suppliers' used by CaixaBank in the UK, procurement is coordinated by the person at CaixaBank's UK Branch who is in charge of requesting the service (the **Service Owner**) and CaixaBank's Outsourcing Governance Department (**GoBex**). The Service Owner reviews and negotiates all supplier documentation in line with the CaixaBank UK Branch Internal Rule on Procurement and Supplier Management (the **UK Rules**), which also take into account CaixaBank Group policy documents, such as the Supplier Code of Conduct and Procurement Principles. The UK Rules requires, as part of the "know your vendor" process, that all compliance / due diligence checks are completed and that Suppliers adhere to the UK Modern Slavery Act 2015. Within the GoBex process for procurement, the department verifies that Suppliers have completed the registration and approval process governed by the Procurement Principles.

  CaixaBank Supplier Portal: Nuestro Modelo EN - Proveedores

- **Procurement Principles**: the Procurement Principles sets out CaixaBank's collaboration framework between its suppliers, to promote stable business relationships in keeping with CaixaBank values and expectations, such as those detailed in the Supplier Code of Conduct. The Procurement Principles apply to CaixaBank's suppliers, 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. The procurement process comprises of a six-stage procurement process via CaixaBank's Suppliers Portal to ensure the transparency and traceability of the process.

  Procurement Principles (July 2025): Principios_de_Compras_ENG.pdf

  Supplier Code of Conduct: sets out CaixaBank's expectations of suppliers providing goods and services to CaixaBank. It requires CaixaBank's suppliers to show strict respect for human and labour rights, ethics and compliance with applicable environmental standards. The policy contains a general principal that:

  "CaixaBank shall only hire suppliers that operate in accordance with best practice in ethical, social and environmental issues, as well as good corporate governance. In turn, suppliers shall respect basic human and labour rights when undertaking their business and work to spread them across their value chain."

  Supplier Code of Conduct (December 2025): Codigo_de_Conducta_Proveedor_ENG.pdf

- **Human Rights Awareness presentation for Suppliers:** CaixaBank has prepared a presentation for Suppliers that clearly sets out the importance of human rights to CaixaBank and how suppliers can help ensure good outcomes from a human rights perspective.

  Human Rights and Business: A Valuable Itinerary for your Company: PowerPoint Presentation

- **The Reporting and Whistleblowing Channel:**

- To facilitate compliance with this Code of Ethics and the rest of the Group's internal regulations, the Group has an Internal Information System, which includes a Reporting Channel where possible improper conduct can be reported. The Internal Information System (IIS) is the system for reporting actions or omissions that may constitute breaches of European Union Law in accordance with Law 2/2023 and those that may constitute a serious or very serious criminal or administrative offence.

Key characteristics of CaixaBank's Whistleblower Channel
Access: CaixaBank's Whistleblower Channel is available to CaixaBank Directors, employees, staff of Temporary Employment Agencies, agents and staff working for or under the supervision of suppliers, shareholders, former employees (whose employment relationship has ended) and job applicants.

Availability: the Whistleblower Channel is available 24 hours a day, 365 days a year and from any type of device (corporate or personal). The Whistleblower Channel can be accessed through:

- CaixaBank's intranet and corporate site;
- E-mail;
- Post; and
- Whistleblowers can also request a face-to-face meeting, which needs to be done through one of the channels listed **above**.

Complaint types: Whistleblowing reports are classified into categories, which are the same as those listed in the form provided on the previously mentioned corporate platform. Among these categories, there is one related to workplace and sexual harassment.

Communication in different languages: Communication through the Whistleblowing Channel can be made in Spanish, Catalan, English and Portuguese.

Confidentiality: CaixaBank maintains strict confidentiality measures to prevent disclosure of any information relating to Whistleblowing complaints to third parties..

Protection: CaixaBank strictly prohibits of any act constituting retaliation and taking such measures as may be necessary for the protection of the whistleblower. The protective measures are described in more detail in section ä "Whistleblower protection".

Anonymity: Any person who uses the Whistleblowing channel can choose to have their complaint anonymised or not. CaixaBank is committed to respect anonymity when this is chosen.

Rights of the affected individuals: CaixaBank adopts the policy of innocence and honour of those individuals affected, along with their right to be heard.

Whistleblowing Channel: Portal Whistleblowing Channel - Whistleblowing Channel (service-now.com).

Requests for clarification of specific concerns regarding the application or interpretation of certain CaixaBank rules of conduct (listed **below**) are managed and resolved separately by using a rigorous, transparent and objective procedure, safeguarding in all cases the confidentiality of the persons concerned and involved in the facts and conduct reported, through CaixaBank's Consulting Channel:

- Code of Business Conduct and Ethics;
- Anti-Corruption Policy;
- Criminal Compliance Corporate Policy;
- Internal Code of Conduct in scope of Stock Market;
- Supplier Code of Conduct; or
- any other policy and internal rule applicable to the CaixaBank Group companies.

Consulting Channel: [Portal Consulting Channel - Consulting Channel (service-now.com)]

CaixaBank does not tolerate any reprisal against those who in good faith report events or situations that may fall under prohibited conduct as set out in this Code. Along these lines, CaixaBank continually works to align communication channels with best practices.

Outsourcing Risk Management Policy: CaixaBank has a dedicated Outsourcing Risk Management Policy, which was most recently updated on 29 July 2025. This policy establishes the corporate principles and premises that regulate the outsourcing process from start to finish. This Policy is governed by the current regulation on outsourcing and mainly on the Guidelines on Outsourcing EBA/GL/2019/02 of the European Banking Authority and Rule 43 of Bank of Spain Circular 2/2016, which was amended by Bank of Spain Circular 3/2022. In addition, this Policy establishes the scope, governance, management framework, risk control and reporting framework of the CaixaBank Group, on which the actions to be carried out in the full life cycle of outsourcing must be based. In particular for ICT services, assessments need to be made by the CaixaBank Group on whether the outsourced ICT service provider acts in an ethical and socially responsible manner and respects human rights.

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

Our people

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

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

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

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

Strategy and Due Diligence

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

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

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

Assessing and Managing Risk

The Human Rights assessment process at CaixaBank is managed by the Direction of Sustainability, which reports into the Sustainability Committee and the Direction Committee.

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

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

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

Secondly, CaixaBank completes the following assessment phase:

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

As a key lever for detecting possible alerts or violations, the different mechanisms and channels of communication and dialogue established for this purpose stand out, such as the channels for complaints, harassment, the Mortgage Customer Service and the RRRS (Reputational Risk Response Service).

Likewise, to carry out due diligence, listening and dialogue exercises with relevant stakeholders (employee surveys, customer surveys, etc.) are taken into consideration, as well as possible cases submitted to the different reporting channels.

Based on our risk assessment, the risk of modern slavery within our UK operations is considered low, given the nature of our business activities. However, we recognise that risks may arise within certain outsourced services and supplier relationships, and we apply risk-based due diligence and ongoing monitoring to mitigate these risks.

Summary of the Due Diligence Process and Human Rights Assessment (July 2023): Resumen_CaixaBank_DD_DDHH_250723_EN.pdf

Training

Annual training in standards and regulations is launched to all employees. All new employees must complete the compliance questionnaire on high ethical standards. All new employees are provided the Code of Ethics and the main Standards of Conduct. In addition to receiving specific training on compliance courses on regulatory matters or issues of sensitivity regarding conduct, CaixaBank provides annual regulatory training, which is mandatory for all employees with completion tied to eligibility for variable remuneration.

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

Such training includes the following:

- April 2017: Code of Business Conduct and Ethics
- January 2018: Criminal Prevention Model
- April and May 2019: Code of Business Conduct and Ethics, Antibribery Policy and Conflict of Interest
- February 2020: The Reporting and Whistleblowing Channel
- February 2021: Criminal Risk Prevention
- September 2022: Internal Code of conduct
- December 2023: Ethics and Integrity
- February 2024: Equity Plan
- June 2025: Preventing Sexual Harassment
- June 2025: Unconscious Bias
- September 2025: Conduct Rules for Conduct Rule Employee at Dual Regulated Firm

Consolidated-Annual-Financial-Report.pdf (p. 350)

Approval

This was approved by CaixaBank's Management Board on 15 June 2026 and signed by Ignacio Badiola, Head of CIB & International Banking.

This statement will be reviewed and updated annually.