Grupo iberCaja

SUPPLIER CODE OF CONDUCT



iberCaja

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1 INTRODUCTION

Consistently with our corporate purpose, mission, values and the Code of Ethics that guide Ibercaja Banco's activities, this Code of Conduct is created for our suppliers.

We seek to protect a relationship of trust and mutual benefit, respecting the interests of both parties, in accordance with the commitments of our Sustainability Policy.



OBJECTIVE 2

For Ibercaja, responsible management and ethical, social and environmental conduct are essential. We are signatories to the United Nations Global Compact and the United Nations Principles for Responsible Banking, and are committed to supporting and implementing those goals. Therefore, this Code of Conduct reflects the compliance requirements that Ibercaja considers relevant to promote sustainable development, respect for human rights, labour regulations, support for work-life balance and environmental protection.

THE PURPOSE OF THIS CODE IS **TO ENSURE THAT OUR SUPPLIERS CONDUCT** THEIR **BUSINESS ACTIVITIES IN ACCORDANCE WITH THESE FUNDAMENTAL PRINCIPLES** AS THE KEYSTONE OF THEIR RELATIONSHIP WITH THE BANK.

3 SCOPE

The **Supplier Code of Conduct** is applicable to Ibercaja Banco's suppliers.For these purposes, in contracts entered into with Ibercaja, **suppliers must sign and ratify their compliance**, and take appropriate measures to ensure that their content is passed on to their employees.

OBSERVING THE PRINCIPLES DESCRIBED IN THE CODE IS A KEY ELEMENT FOR THE BANK'S ASSESSMENT AND SELECTION OF SUPPLIERS.

IBERCAJA'S RELATIONSHIP WITH SUPPLIERS 4

Ibercaja Banco bases its relationship with suppliers on **ethical principles** and **good practices** that, in line with the interests of both parties, secure the **highest level of quality** and commitment in the goods and services provided.

Bank **executives** involved in selection processes act **impartially** and **independently**, and their actions are recorded in line with procedures.



Bidding, awarding and purchasing processes must be **transparent** and **open**, with the involvement of a sufficient number of companies to ensure a variety of offers.

Bids from **approved suppliers** will be considered if they comply with all regulatory duties, show a business record of integrity and ethics, and maintain a socially responsible and sustainable practice. Value is placed on the approaches and policies implemented by the companies on social, environmental and human rights issues.

IBERCAJA SUPPORTS SMES, THOSE OF A SOCIAL NATURE AND THOSE FAVOURING TERRITORIAL COHESION IN THE AREAS IN WHICH THEIR ACTIVITIES ARE PERFORMED.

COMPLIANCE WITH THE **PRINCIPLES** DESCRIBED BELOW, **IN LINE WITH THE CODE OF ETHICS AND IBERCAJA'S VALUES**, IS A KEY ELEMENT WHEN SELECTING AND ASSESSING SUPPLIERS.

5 SUPPLIER RESPONSIBILITY

IBERCAJA BANCO REQUIRES ITS SUPPLIERS TO COMPLY WITH THE FOLLOWING:

ETHICS

Suppliers must always act with **integrity, responsibility** and with the **highest degree of business ethics**. Ibercaja believes ethics and trust to be essential requirements for the maintenance of its business relationships.

Ibercaja has a **Code of Ethics** that sets out the principles that must be complied with by all the people who work at the Bank, and which are specified as follows: rigour and strict compliance with the rules, honesty and integrity, respect and support to the client, exemplary conduct, protection of the reputation and information of the Bank, care in the use of media, and commitment to the environment. It is crucial for Ibercaja that its suppliers are aligned with these ethical principles in the conduct of their activities.

HUMAN RIGHTS

Suppliers must **support and respect the protection of fundamental human rights**, recognised internationally, within their scope of action and throughout their supply chain. They must ensure that they are not complicit in any form of breach or illegality with respect to human rights.



EMPLOYMENT RULES AND STANDARDS

Suppliers must maintain an environment in which all **workers are treated with dignity and respect**. All forms of forced labour must be prohibited, with strict respect for human and labour rights.

Suppliers must: Comply with all applicable labour **laws** and **regulations** and those related to the benefit, health and safety of workers, respecting the **legislation in force**.

Not permit the **recruitment** of minors under legal working age and, in any case, under the sufficient age to finish basic compulsory education.

Avoid **discrimination** due to gender, race, colour, age, social origin, religion, nationality, sexual orientation, political opinion, physical or mental disability or trade union membership, **supporting equal opportunities** and stimulating methods to eradicate discrimination at work centres or in their catchment area.

Respect the **rights of employees** to freely associate and collectively organise and negotiate, pursuant to prevailing legislation.

Provide employees with a **safe** and **healthy employment environment**, which complies with the applicable laws and regulations, implementing occupational risk prevention and health and safety programmes.

In addition, suppliers will support the work-life balance of employees by promoting work-life balance measures. Suppliers must be able to provide Ibercaja with information on **health**, **safety** and **work-life balance** issues.



ENVIRONMENT

Our suppliers must maintain a **preventive stance** that supports the **environment** and the fight against **climate change**. They must comply with environmental protection, in line with current legislation, endeavouring to:

» **Adopt procedures** that minimise the environmental impact of their business.

» **Set targets for emissions reduction** and responsible consumption of basic resources to support sustainable development.

» Support recycling and reuse of materials and products via the circular economy.

» Use **technologies that respect** the environment.

» Encourage initiatives that promote greater **environmental responsibility** and the required training and awareness among their employees.

» Take into account, in the conduct of their activity, the risks and opportunities arising from **adaptation to climate change**.



FIGHT AGAINST CORRUPTION

Suppliers must apply a **zero tolerance policy towards bribery and corruption**, prohibiting offering, promising, giving, soliciting or demanding gifts, bribes or any type of payment outside of a contract in order to obtain or maintain business relations, and avoiding the distribution of any gift outside social norms or courtesy customs.

CONFIDENTIALITY AND INFORMATION SECURITY

Suppliers must comply with applicable **data protection, privacy and information security laws** and with the clauses specified in the contract between the supplier and Ibercaja.

Suppliers undertake **not to disclose** or **misuse confidential information** obtained in connection with the business relationship with the Bank.





Ibercaja's suppliers must demonstrate their commitment to the principles of this Code by accepting compliance with it in contracts they enter into with the Bank and via the Supplier Portal. Suppliers must also endeavour to promote the principles of the Code throughout the value chain.

Ibercaja Banco may itself or through third parties inspect suppliers to verify compliance. Ibercaja will refrain from doing business with suppliers that are found to have breached any of the criteria of the Code of Conduct and reserves the right to use any legal tools available to terminate the business relationship with the supplier if Ibercaja becomes aware by any means of the breach of any of the criteria.

Approval

SUPPLIER CODE OF CONDUCT OF IBERCAJA HAS BEEN APPROVED BY THE PURCHASING COMMITTEE ON JULY 2, 2020 AND REPLACES THE PREVIOUS ONE, IN FORCE SINCE 2016

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