

Compliance

CaixaBank's core principles underlying its operation and governing its business are adherence to laws, respect, integrity, transparency, excellence, professionalism, confidentiality and social responsibility.

CaixaBank Code of Business Conduct and Ethics and Corporate Anti-Corruption Policy aim to not only comply with applicable legislation, but also its firm commitment with its ethical principles as a signatory to the United Nations Global Compact. In accordance with CaixaBank's Code of Business Conduct and Ethics and the principle of compliance with the law, CaixaBank defines, in its **Corporate Policy on Criminal Compliance**, the Crime Prevention Model, which includes the set of measures aimed at preventing, detecting and reacting to criminal conduct and identifies the risks and controls associated with the same that are established.

All employees, executives, and members of boards of directors must comply with laws and regulations in force at any moment, as well as any other internal CaixaBank standards or memoranda whose priorities include the fight against money laundering and the financing of terrorism.

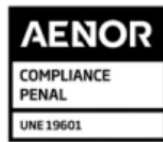
The CaixaBank's branch in Italy (the **Italian Branch**), as part of the International CaixaBank Network, supports and promotes compliance with the values and ethical principles within its scope of action.

All the information on the **main socially and environmentally responsible policies and principles** can be consulted here. <http://www.caixabank.com/en/sustainability/culture-responsibility/ethics-integrity-policies.html>

As a result of the commitment to promote a responsible culture, CaixaBank has obtained the following certifications:



UNE-ISO 37301:2021: Certification of Compliance Management Systems.



UNE 19601:2017: Certification of Criminal Management Systems.



ISO 37001:2016: Certification of Anti-bribery Management Systems.

Prevention of Money Laundering and International Financial Sanctions

CaixaBank Group is firmly committed to anti-money laundering and counter terrorist financing and to ensuring full compliance with Sanctions Programmes and International Financial Countermeasures.

The **Italian Branch** has adopted said commitment governed by the main laws, regulations and directives applied by the local authorities - Bank of Italy and the Italian Financial Intelligence Unit (the **FIU**) -, in addition to promoting the application of the highest international standards in this area (European Banking Authority (EBA), European Central Bank (ECB), Financial Action Task Force (FATF), amongst others).

In order to fulfil its main aim of prevention of money laundering and terrorist financing, the **Italian Branch is obliged to fulfill customer due diligence requirements ('obblighi di adeguata verifica della clientela') vis-à-vis each customer and report to the FIU any suspicious transaction detected in the course of its operations in accordance with the current laws and regulations at all times, as well as its internal regulations and procedures.** Specifically:

the customer due diligence requirements mainly consist of:

- identifying customers and their beneficial owner(s) ('*titolare effettivo*')

- obtaining and assessing information on the purpose and nature of the on-going relationship (*'rapporto continuativo'*)
- conducting ongoing monitoring of the relationship for the entire course of it by examining the customers' overall operations, verifying and updating the data and the information referred to under previous points.

With regard to International Sanctions, CaixaBank Group complies with all financial or commercial laws, regulations, embargos or restrictive measures administered, enacted or executed in **Italy, the European Union or any current or future EU Member State thereof, and the United Nations.**

Similarly, and as a voluntarily commitment and when deemed advisable, other international sanctions programmes shall be adhered to, such as the rules and regulations of the Office of Foreign Assets Control (OFAC) applicable in the United States of America and/or Office of Financial Sanctions Implementation (OFSI) regulations in the United Kingdom.

More information on the **General Principles of CaixaBank Group Corporate Policy for Anti-Money Laundering and Counter Terrorist Financing, and Management of the Sanctions and International Financial Countermeasures** may be viewed at this link: [Corporate policies and other corporate documents | CaixaBank](#)