



# Human Rights Principles of VidaCaixa

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# 1. Introduction

The Board of Directors of VidaCaixa S.A.U. (hereinafter 'VidaCaixa' or the 'Entity'), by means of these Principles, aims to highlight the Entity's commitment to human rights, in accordance with the highest international standards.

For VidaCaixa, respect for human rights is an integral part of its values and the minimum standard of action to legitimately carry out business activities.

Likewise, it considers that the protection of human rights rests mainly with governments and that companies have the responsibility to promote them and respect them within their scope of action.

Under this premise, in line with its Code of Ethics and Principles of Action, VidaCaixa operates within a culture of respect for human rights and expects its employees, collaborators, partners and all other parties directly involved with its operations and products to do the same.

# 2. Scope and application

The principles of action serve as a guide on human rights in terms of the relationships that VidaCaixa has with its employees, clients, shareholders, suppliers, business partners and the communities in which it operates.

These Principles, which are aligned with CaixaBank's corporate Human Rights Principles and are tailored to VidaCaixa's specific circumstances, will apply to all employees, managers and members of VidaCaixa's Governing Bodies.

Likewise, these Principles are corporate in nature, which is why the Governing and Management Bodies of VidaCaixa's insurance subsidiaries must adopt the appropriate decisions for the purpose of integrating their provisions into these companies, following the principle of proportionality. They can approve their own Policy in line with the principles set out in this document or they can abide by VidaCaixa's Policy after duly adapting it to their own particular case.

These Principles have been drafted with the participation of VidaCaixa' Divisions involved: Sustainability; Regulatory Compliance; Risk Management; Communications, Branding and CSR; among others.

VidaCaixa will promote and disseminate these Principles among its stakeholders.



## 3. Commitments and principles of action

VidaCaixa undertakes to respect all internationally recognised human rights as set out in:

- The International Bill of Human Rights by the United Nations, which comprises:
  - The Universal Declaration of Human Rights
  - The International Covenant on Civil and Political Rights
  - The International Covenant on Economic, Social and Cultural Rights
  - The European Union Action Plan on Human Rights and Democracy 2020-2024
- The ILO Declaration on Fundamental Principles and Rights at Work and the eight core conventions it has identified
- The Charter of Fundamental Rights of the European Union
- The Principles for Sustainability Insurance (PSI) of UNEP FI (United Nations Environment Programme Finance Initiative)

Likewise, it undertakes to carry out its activities in strict compliance with the applicable regulations in accordance with the highest ethical standards and standards of professional conduct. These include:

- The United Nations Guiding Principles on Business and Human Rights
- The OECD Guidelines for Multinational Enterprises
- The United Nations Global Compact
- The United Nations Principles for Responsible Investment

VidaCaixa makes every effort to understand the impacts on human rights arising from its activities and undertakes to prevent and avoid contributing to potential adverse impacts, and if any, to mitigate them to the extent possible.

The Human Rights Principles are aligned with other specific regulations and policies such as the Code of Ethics and Principles of Action, the Corporate Anti-Corruption Policy and the Corporate Criminal Compliance Policy, as well as the adherence to international corporate responsibility initiatives.

### 3.1 Our responsibility towards our employees

VidaCaixa considers its relationship with its employees one of its main responsibilities in terms of human rights.

The selection, management, promotion, remuneration and personal development criteria are based on respect for diversity, equality, meritocracy regardless of gender, gender identity, ethnicity, colour, nationality, creed, religion, political opinion, affiliation, age, sexual orientation, economic status, disability and any other social condition protected by law.

Within this framework, VidaCaixa ensures:

- Promotion of diversity, inclusion and equality, including these principles in the Entity's remuneration policy.
- Protection against harassment, discriminatory attitudes and abuse of authority.

- Freedom of expression and opinion.
- Freedom of association and strike action.
- Data protection and the right to privacy.
- Freedom of association and collective bargaining.
- Safety in the workplace and the health and wellbeing of the workforce.
- Prevention of corruption.
- Minimum wage as a matter of human dignity, abiding by applicable labour standards.
- Working hours that respect human rights, in line with applicable labour standards.
- Promotion of professional development and training.
- Rejection of forced and child labour as well as human trafficking.

To facilitate compliance with VidaCaixa's codes of conduct, there are confidential channels through which employees can raise questions about their interpretation and practical application and report possible violations of these codes of conduct or any other kind of regulation.

### 3.2 Our responsibility as providers of insurance products and pension plans

VidaCaixa expects its employees to show respect for people, their dignity and their core values, as set out in its Code of Ethics and Principles of Action. Likewise, it aspires to work with clients that share its values with regard to human rights, acknowledging that its degree of influence on them will depend on the nature and circumstances of the relationship.

In this regard, VidaCaixa undertakes to use all the means at its disposal to:

- Ensure access to its products without any discrimination for reasons of gender, gender identity, ethnicity, colour, nationality, creed, religion, political opinion, affiliation, age, sexual orientation, economic status, incapacity, disability and any other social condition protected by law.
- Have a series of policies and procedures in place to ensure that the organisation has sufficient knowledge of its clients, in accordance with the legal requirements in each case.
- Respect confidentiality, right to privacy and privacy of client and employee data.
- Develop new products in line with its human rights aspirations.
- Offer its clients products tailored to their circumstances and needs.
- Ensure that all business information on products and services is truthful, lawful, honest and reliable.
- Integrate social and environmental risks into decision-making and avoid financing or investing in companies and/or projects linked to serious human rights violations. To be specific, this includes:
  - The application of the provisions of the Sustainability Risk Integration Policy and other internal regulations on social and environmental risk management.
  - Adherence to the criteria set in the sectoral policies laid down by the Entity.
  - VidaCaixa adheres to the United Nations Principles for Responsible Investment as a sign of its willingness to integrate these principles into the management of investment funds and pension plans.

To this end, VidaCaixa has policies, principles, committees, due diligence processes and other internal systems in place which help it determine when it is appropriate or acceptable to enter into client relationships, as well as take part in certain transactions. Controls are built into the Entity's overall processes and vary according to size, sector and client profile as well as geography, context and potential risk of the adverse impact. Likewise, external support for the implementation of these controls is possible if deemed necessary.

Additionally, for the purposes of complying with these Principles, as well as any other guidelines that the Entity has committed to, VidaCaixa has complaints and claims management systems intended to ensure the implementation of transparency and consumer protection regulations in the resolution of conflicts and in the continuous improvement of the marketing processes for its products. In the same way, the Entity has different channels for communications, queries and complaints, which supplement official channels.

### 3.3 Our responsibility towards suppliers

VidaCaixa expects strict respect for human and workers' rights from its suppliers and encourages them to include behaviours aligned with its values in their practices and to convey these to their own value chains.

In this regard, VidaCaixa promotes and includes among its practices:

- Knowledge and respect for the CaixaBank Group's ethical standards and standards of conduct by supplier companies, as part of the corporate model that VidaCaixa adheres to.
- Having a series of principles and procedures in place to ensure that the organisation has sufficient knowledge of its suppliers in accordance with the legal requirements in each case.
- Knowledge and respect for the Principles of the United Nations Global Compact.
- Carrying out additional controls, when deemed necessary, over suppliers that are internally considered to have a potential risk of medium/high.
- Adopting the necessary corrective actions to mitigate any eventual breach of its standards.

### 3.4 Our responsibility as part of the community

The sustainability of VidaCaixa's business model is directly linked to the prosperity of the regions in which it operates.

VidaCaixa undertakes to comply with all applicable laws, collaborate with public institutions and the justice system, and respect internationally recognised human rights wherever it operates. Likewise, VidaCaixa undertakes to make a positive contribution to human rights in the communities in which it operates. In line with its mission, vision, values and the commitments made in its Principles of Action for Sustainability and the Statement on Climate Change, it:

- Facilitates the dissemination of international principles on human rights within its area of influence and, to this end, it collaborates with other institutions, international organisations and government bodies to the extent possible.
- Promotes and disseminates the initiatives and programmes that make a positive contribution to human rights and the United Nations Sustainable Development Goals.

Additionally, VidaCaixa has communication channels through which its stakeholders can submit their queries, claims and suggestions.

## 4. Implementation and communication of the Principles

In the implementation of the Human Rights Principles by employees, managers and members of governing bodies, the Code of Ethics and Principles of Action adopted by the Board of Directors will be followed.

VidaCaixa considers human rights performance when starting, renewing, extending or terminating business relationships with third parties. In this regard, it undertakes to devote the necessary resources to ensure the effective implementation of these Principles.

A human rights culture is built into the Entity through regular communications and training actions.

Likewise, the Entity periodically analyses human rights issues relating to its activities and implements due diligence processes to assess the risk of noncompliance, based on which it proposes prevention and remedy measures for the negative impacts and measures to maximise positive impacts.

What's more, it will maintain and disseminate effective communication or complaint mechanisms so that the people directly affected by its operations can notify it of any situation with a possible impact on human rights. In this regard, VidaCaixa continuously works to align its communication channels with best practices at all times.

These Principles will be made public and actively communicated to the entire workforce and other relevant parties.

## 5. Governance framework

**VidaCaixa's governing bodies** carry out certain functions associated with their responsibility to approve and supervise the strategic and management guidelines set out for human rights, in the interest of all the VidaCaixa Group companies, as well as the supervision, monitoring and integrated control of the Group's risks as a whole.

VidaCaixa's **Board of Directors** is responsible for approving these Principles and the commitments to stakeholders included in this document.

VidaCaixa's **Appointments, Remuneration and Sustainability Committee** is responsible, among other functions, for the supervision of its performance in environmental, social and governance initiatives, including those relating to human rights and for submitting the proposals it deems necessary to the Board.

VidaCaixa's **Audit and Control Committee**, in relation to these Principles, reviews compliance with the regulatory requirements in the preparation of financial information.

The **Steering Committee** plays an essential role in transferring good governance criteria and principles to VidaCaixa's internal organisation. These include compliance with the regulations in force and the assumption and update of these principles.

The functions of the **Sustainability Division** include promoting compliance with the Principles and driving initiatives to make progress in this regard, defending and promoting human rights, executing the Sustainability Master Plan, managing the initiatives in this regard as agreed by the governing bodies, monitoring the initiatives implemented in the VidaCaixa Group and carrying out periodic internal and external reporting.

VidaCaixa's **Sustainability Steering Group**, as a review body for aspects related to sustainability, aims to coordinate decisions on sustainability and review these Principles, for information purposes.

Lastly, the different areas and divisions affected by these Principles will be responsible for the application, integration and execution of their provisions in their daily activities and in the related internal regulation, as they deem appropriate, as well as setting and implementing controls to monitor their application.

## 6. Update of the Principles

These Principles will be reviewed by the Board of Directors every two years. Nevertheless, the Sustainability Division, as the manager of these Principles, will review their content on an annual basis and, if necessary, will propose amendments to them that will be submitted to the Board of Directors for approval.

Additionally, these Principles may be updated at any time upon the request of any of the areas involved that has identified the need to amend it as a result of any of the following reasons, among others:

- Changes in the regulatory framework.
- Changes in the business objectives and strategy.
- Changes in the management approach or processes.
- Changes arising from the results obtained in the monitoring and control activities.
- Changes arising from the due diligence and assessment process
- New policies or amendments to existing policies that affect the content of these Principles
- Modification of the organisational structure that involves a change of functions in the management of the Principles.