

## VidaCaixa's Code of Ethics



**May 2025**

## Version Control

Version	Approval date	Section responsible	Change made	Endorsement/Approval
1.0	July 2014	Legal and Regulatory Compliance	Update	Board of Directors
2.0	January 2016	Legal and Regulatory Compliance	Update and change of the section responsible for managing the queries and	Board of Directors
3.0	May 2017	Legal and Regulatory Compliance	Update for its adaptation to the CaixaBank Code of Ethics	Board of Directors
4.0	April 2019	Legal and Regulatory Compliance	Update for its adaptation to the CaixaBank Code of Ethics	Board of Directors
5.0	July 2021	Regulatory Compliance Area Department	Update for its adaptation to the CaixaBank Code of Ethics: reinforcement of some ethical, compliance and environmental messages; references to the Supplier Code of Conduct, Competition Law, Corporate Conflicts of Interest Policy and Telematic Code of Conduct; updated references to the Queries and Whistleblowing Channel; gender references, changes to wording, and changes to the structure of the contents.	Board of Directors

6.0	December 2023	Regulatory Compliance Department	<p>Update for its adaptation to the CaixaBank Code of Ethics:</p> <ul style="list-style-type: none"> <li>- Change of title and inclusion of an institutional message.</li> <li>- Repositioning of the content of several sections (1; 2; 3.1; 3.3).</li> <li>- Section 3: removal of the list of principles of action. These are set out below.</li> <li>- Section 3.1. Modification of the section on judicial or administrative proceedings, clarifying the methods for receiving summons, decisions or notifications from a judicial, administrative and/or arbitration body.</li> <li>- Section 3.2. Inclusion of the concept of respect for diversity and the broadening of the commitment to the environment.</li> <li>- Section 3.3.: <ul style="list-style-type: none"> <li>o Inclusion of a reference to the Queries Channel and a specific Anti-Corruption section.</li> <li>o Renaming of the section on "Securities transactions" to "Internal Code of Conduct" and new definition of its contents.</li> </ul> </li> <li>- Section 3.4.: Change to the wording.</li> <li>- Section 4.: Inclusion of a specific section on the Regulatory Compliance Function.</li> <li>- Section 5. Removal of the reference to the Queries Channel as a consequence of the separation of the two channels.</li> <li>- Aspects of the wording</li> </ul>	Board of Directors
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7.0	May 2025	Regulatory Compliance Department	<p>Removal of the section "Institutional message".</p> <p>Section "1. Our identity and mission", inclusion of the definition of the corporate culture in accordance with the requirements established in the CSRD Directive.</p> <p>Section "3. Principles of action", inclusion of the definition of corporate conduct in accordance with the requirements established in the CSRD Directive.</p> <p>Section "5. Whistleblowing Channel", updating in accordance with the provisions of Law 2/2023 on protection of the whistleblower, referring to the internal information system.</p> <p>General: Adaptation of the Code of Ethics to the 2025 Corporate Model and aspects of the wording.</p>	Board of Directors
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## 1- Our identity and mission.

Our corporate and social activity is based on the corporate values of quality, trust and social commitment.

☆☆☆ Quality: Determination to provide customers with an excellent customer experience and offer them the products and services that best suit their needs.

 Trust: integrity combined with professionalism. We build it through empathy and communication, being there for our customers and easy to contact.


 Social commitment: commitment not only to contributing value to customers, the shareholder and employees, but also to contributing to the development of a fairer society, with more equal opportunities. It is our background, the basis on which we were founded, that sets us apart and makes us unique.

At VidaCaixa S.A.U., de Seguros y Reaseguros, as an insurance and pension company belonging to the CaixaBank Group, our mission is to fully meet the needs of our customers through a suitable and comprehensive range of products and services and excellent quality of service, with the commitment to contribute value to customers, the shareholder, employees and society as a whole.

Our corporate culture is rooted in our founding principles and reflects the way we are and the way we do things across the CaixaBank Group, including VidaCaixa. Based on our corporate values of quality, trust and social commitment, its essence is captured in the principles of conduct set out in our Code of Ethics. These are mandatory, underpin all internal Group policies, and guide decision-making at all levels of the organisation.

It also extends to our suppliers.

At VidaCaixa we are committed to running our business following the strictest legal and ethical standards and meeting the highest standards of professional conduct, in the interest of our customers, of the community and of everyone directly involved with us.

 With the approval of this Code, the Board of Directors of VidaCaixa, S.A.U. is emphasising the values and ethical principles that inspire its actions and that must determine the activity of all employees, managers and members of its Governing Body. At VidaCaixa, we will not ignore, excuse or tolerate behaviour that goes against these values and principles.

## 2- It applies to everyone



1. This Code, aligned with that of CaixaBank, applies to everyone forming part of VidaCaixa, that is, to all the employees, managers and members of VidaCaixa's Governing Bodies. We must all be familiar with and obey this Code.
2. We must respect the values, principles and rules contained in this Code across all our professional activity. This includes our internal professional relationships inside the company and our external relationships with the shareholder, customers, suppliers and society as a whole.
3. This Code, aligned with the CaixaBank Corporate Code, also applies to the entire VidaCaixa Subgroup, forming a reference document for all companies in the Subgroup. The Governing and Management Bodies of those companies must adopt the appropriate decisions to ensure the inclusion of the provisions of this Code, either approving their own Code following the principles set out in this document or adopting the VidaCaixa Code, with any adaptations as appropriate.
4. Violations of this Code of Ethics may be subject to sanctions in accordance with the provisions of the Workers' Statute and the applicable Collective Bargaining Agreement and other relevant regulations.
5. The values and principles set out in this Code also apply to the VidaCaixa Group's suppliers. This is implemented through the Supplier Code of Conduct, which disseminates and promotes these values and principles in the activity of our suppliers, as well as in those third parties whose contractual relationship requires compliance with them.
6. The Code is available on VidaCaixa's corporate website, as well as in the regulatory archive on VidaCaixa's intranet.

*Appendix 1 - Decision-making guide* includes a questionnaire to assist in decision-making in accordance with the provisions of this Code.





### **3- Principles of action**

Compliance with the laws and regulations in force at any given time, respect, integrity, transparency, excellence, professionalism, confidentiality and social responsibility are our basic principles of action.

Our business conduct puts people at the core and is based on the highest legal and ethical standards set out in this Code of Ethics, including: transparency with our customers and shareholders; the prevention of money laundering; the fight against corruption and bribery; the non-engagement of direct lobbying or interest representation services to influence authorities; and strict compliance with personal data protection regulations.

In line with the corporate culture of the CaixaBank Group, our business conduct is rooted in strong corporate governance, shaping decision-making and enabling the sustainable development of any project.

In the same way, we promote its extension across the entire value chain.

The content of VidaCaixa's internal policies is adapted to reflect the values and principles of action contained in this Code.

#### **3.1 Compliance with the laws and regulations in force**

Our actions are guided by respect for the laws and other regulations in force at all times.

##### **I. Utmost respect for the law**

1. VidaCaixa is committed to complying with the laws and regulations in force at all times, as well as any internal regulations or circulars. In order to improve understanding of the legislation and internal regulations in force and thus ensure compliance with these, at VidaCaixa we conduct regular training on the matters that impact the running of our business.

2. At VidaCaixa we strictly comply with the rules that implement the Prevention Model to prevent, detect, avoid and, where appropriate, report the possible committing of crimes. At VidaCaixa we categorically reject any conduct of an illegal or criminal nature or any that implies a breach of the internal regulations through action being taken to benefit the Company, regardless of the possible economic benefit generated.



3. In the performance of our duties, we must always act in a lawful, ethical and professional manner, complying at all times with the laws, regulations and other legally binding rules. Our principles of action and our reputation must not be compromised.
4. We must all cooperate with any investigation or audit, internal or external, conducted by or in VidaCaixa.

## **II. Money laundering and terrorism financing**

1. The fight against money laundering and terrorism financing is a priority for us. Therefore, in accordance with current legislation, we have internal rules for the prevention of money laundering and terrorism financing, including compliance with international financial sanctions programmes, which are mandatory.
2. If any doubts regarding this matter arise in our daily activities, we must immediately consult our managers or those responsible for the prevention of money laundering in the Company.

## **III. Health and safety and well-being**

1. The health and safety and well-being of its employees is a fundamental priority for VidaCaixa. That is why, in addition to strictly complying with all applicable regulations, we have an internal portal on the VidaCaixa intranet where all employees can consult the internal regulations, policies and different pieces of information on health and safety and well-being. We also understand that supporting our well-being is not simply a legal or ethical obligation, but means building a culture of care and commitment in our organisation.
2. At VidaCaixa we implement measures and policies that promote a safe and healthy work environment. As part of this, we have created an occupational health and safety policy and manual. Through our intranet, we also offer preventive information on occupational health and well-being, as well as instructions and protocols for action in the event of any incident that may occur.
3. Moreover, at VidaCaixa we also focus on emotional and mental health and safety. We offer programmes and benefits that help maintain a work-life balance. These help create a respectful and collaborative work environment, encouraging open communication and mutual support.

## **IV. Judicial or administrative proceedings**

1. We are obliged to collaborate actively and diligently with the Company, following the instructions we receive from Legal Counsel, in the defence of VidaCaixa's interests when dealing with any judicial, arbitration and/or administrative body.
2. In particular, we are required to appear before judicial, administrative or arbitration bodies when we receive a summons from those bodies, at either our personal or professional address or when requested to do so by Legal Counsel. We must also collaborate with the Company when asked to prepare for or attend an appearance or statement in any proceeding.

If we receive a summons, decision or notification from a judicial, administrative or arbitration body at our personal or professional address, in relation to our work at VidaCaixa, we must communicate this through the routes established in the internal rules, always informing a hierarchical superior.

### **3.2 Respect**

We respect people, cultures and their diversity, institutions, the pluralism of the regions in which we operate and the environment.

#### **I. Respect for people**

1. At VidaCaixa one of our fundamental values is respect for people and their dignity, and we fully adhere to the Universal Declaration of Human Rights adopted by the United Nations, which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights. We also accept and respect the ILO Declaration on Fundamental Principles and Rights at Work and the Charter of Fundamental Rights of the European Union.
2. We must treat the people who work at the Company and, in general, anybody who interacts with it, with respect.
3. At VidaCaixa we treat the people who work at the Company and, in general, anybody who interacts with it, in a fair manner, regardless of their sexual identity, gender expression, sexual orientation, ethnic origin, nationality, beliefs, religion, opinion, politics, affiliation, age, marital status, disability and other situations protected by law.
4. We reject any type of discrimination, harassment, intimidation or abuse, as well as any conduct that may be considered offensive, improper or inappropriate. At VidaCaixa we are opposed to any sexual proposals or suggestions and other actions that may offend people's dignity.
5. We encourage team leaders to promote the work-life balance of the people forming part of the Company, as well as equal opportunities among employees based on a meritocracy and in accordance with the laws and agreements signed with workers' representatives and other institutions that promote diversity, equal opportunities, well-being and work-life balance.

#### **II. Respect for cultures and their diversity**

At VidaCaixa we respect the local cultures of the communities and countries where we operate, as well as their diversity, always guided by respect for human rights, and we adopt an active and committed attitude towards the different communities and countries, contributing to their progress and socio-economic development.

### III. Respect for institutions

We always interact with institutions, including public administrations, in accordance with current legislation, respecting the institutions and collaborating appropriately with them.

### IV. Respect for political pluralism

1. We respect the political pluralism of the societies in which we operate, and consequently all our activity is governed by the principle of political neutrality.
2. Any relationship, membership or collaboration with political parties or other types of public entities, institutions or associations must be carried out making clear its personal nature, avoiding involving or compromising VidaCaixa's name, corporate image or legitimate interests.

### V. Respect for the environment

We work to limit the environmental impact of our activities and operations. We act to increase the positive impact of our business and promote a sustainable future for society and the environment.



We consider the direct and indirect impacts of our actions on the environment and comply with the principles set out in our internal policies relating to the environment and climate change.

#### 3.3. Integrity

We behave in an honest way to generate trust, this being a fundamental value for VidaCaixa.



#### General principles

1. The trust of the shareholder, customers and, in general, the area in which we operate forms the basis of our business activity. Trust can only exist if our integrity cannot be disputed.
2. At VidaCaixa we believe in free, honest and fair competition. We have internal regulations on Competition Law whose main objective is to ensure compliance with the rules in this area.
3. When performing our professional activity, we may face a dilemma on which we need to make a decision. In these cases, we must apply common sense and ask ourselves the questions included in *Appendix 1 - Decision-making guide*. In any case, VidaCaixa's Queries Channel is available for us to use.



## Anti-corruption

1. At VidaCaixa we take an active position of not accepting any action or omission that is directly or indirectly related to acts of corruption in all the markets in which we operate. With this goal in mind, we follow CaixaBank's Corporate Anti-Corruption Policy, which is an essential tool to prevent VidaCaixa, Group companies and their external collaborators, directly or through intermediaries, from engaging in conduct that may be contrary to the law or to the basic principles of action of the CaixaBank Group.
2. Among the standards of conduct included in this Policy are our corporate principles on giving and receiving gifts and travel and hospitality expenses.



## Conflicts of interest

1. At VidaCaixa we respect the private lives of our employees without interfering in their activities or conduct away from their work at the Company, provided that such activities or conduct do not affect our good name or our legitimate interests.
2. Our reputation depends, among other things, on the perception that we manage to generate in society, through the activity carried out in all areas of action and our conduct. When performing private activities, we will not involve or use the name or image of VidaCaixa, especially if they may have a public impact in the media or social networks. We reject any practice not in keeping with our values and principles of action in any situation.
3. We are required to promote the interests of VidaCaixa and cannot personally benefit from opportunities arising within the framework of our professional activity or through the use of VidaCaixa's assets or information or benefit third parties using these. We do not tolerate personal interests being put above those of the customers or the interests of VidaCaixa and its shareholder.
4. We must avoid any actual or potential conflicts of interest, including those arising through family or other similar relationships. In these situations, the person affected by the conflict of interest must refrain from intervening or participating in the negotiation or transaction in question. Consequently, we must refrain from participating in transactions of any kind involving our own interest or that of any related person or company.
5. We must not make use of any confidential or insider information we may have as a result of our professional activity for our own benefit or for the benefit of a third party.
6. We have mandatory internal regulations on the prevention of conflicts of interest in different areas, which we must comply with due to their nature and as the implementation of the general principles contained in this section. These regulations provide an overall framework, general principles and action procedures for the handling of conflicts of interest. The highest-ranking document is the Corporate Conflicts of Interest Policy of the CaixaBank Group (to which VidaCaixa is a signatory). This, among others, includes the obligation for employees to report certain activities that, due to their nature, may entail a conflict of interest, the internal rules of conduct in the securities market and the rules for granting risks to people related to the Company.

## Internal Code of Conduct



1. The Internal Code of Conduct applies to everyone working in the securities markets. Those who work in areas related to the securities markets or who have regular access to insider information have additional obligations relating to their personal operations.

2. If we operate in the securities market area, we must not perform transactions with financial instruments about which we have insider information, nor recommend to third parties that they buy or sell these instruments. In turn, we must not carry out transactions that involve market manipulation of financial instruments, sending false or misleading signals or impacting their price or volume.

If we have insider information, we must inform the Regulatory Compliance Department through the Queries Channel available on the VidaCaixa intranet.

3. If we detect suspicious transactions by customers involving the use or attempted use of insider information or manipulation or attempted manipulation of the market, we must also inform the Regulatory Compliance Department.

#### Protection of VidaCaixa's assets

1. We must take care of VidaCaixa's goods and assets, which may only be used for their own legitimate purposes.
2. We must respect the rules on the use of resources, the rules on computer security and the intellectual property rights of the software used by the Company, all in accordance with the internal regulations on that matter and, in particular, with the provisions of the Telematic Code of Conduct. Unapproved software must not be used on the Company's devices.
3. The goods and assets, tangible and intangible, which we create for VidaCaixa in the framework of our professional service provision relationship, regardless of whether or not we use its resources, belong to VidaCaixa, even after the termination of our relationship with the Company.

### 3.4 Transparency

We are transparent in the performance of our activity. To ensure that our customers are duly informed, our main policies and relevant information about our business are published on our corporate website.

#### Transparency with society

At VidaCaixa we are committed to society through honesty, transparency and compliance with the applicable regulations. This is a fundamental value underpinning our actions.

#### Transparency with customers and shareholders

1. At VidaCaixa we provide our customers with suitable explanations, which are precise, clear and truthful, about the features of the products and services we sell so that they can freely choose the product or service that best suits their needs and interests. We also ensure that they are aware of and fully understand the risks associated or inherent to such products or services.
2. The customer's interests and needs always prevail over our own in all phases of the marketing of products and services, acting with honesty and transparency in relation to the information provided. In order to ensure correct marketing that meets the customer's needs and guarantee a long-lasting relationship of trust, it is important to ensure an adequate level of protection through the implementation of transparency measures. This includes the support of informative material and the delivery of the necessary pre-contractual and contractual documentation in each case.

3. At the CaixaBank Group, we promote clear, sufficient, balanced, objective and non-misleading advertising, in a simple and easy to understand language, without omitting necessary information, creating false expectations or misleading people about the features of the product or service offered, so that the recipient can make an informed decision about the products and services advertised.

4. At VidaCaixa we design and adapt the offer of products and services to the interests, objectives and characteristics of the customers in an effort to meet the real needs of the people for whom they are designed.

5. All of us must always have the necessary and up-to-date knowledge and skills through training on the products or services we market. To this end, we must take the necessary mandatory and ongoing regulatory training courses, including, but not limited to, training related to the Insurance Distribution Directive (IDD).

6. We have a (group) Customer Service Department responsible for handling and resolving customer complaints, independent of the sales and operational areas of VidaCaixa and CaixaBank. It makes its decision on the basis of the customer protection regulations relating to financial services and the values and principles contained in this Code. Among other things, this service will aim to avoid legal disputes with customers by applying a general policy of strict compliance with the guidelines of supervisory bodies.

7. We make available to our shareholders all relevant financial and corporate information, in accordance with current regulations.

#### Transparency in supplier relationships

1. We select suppliers in a framework of free competition and with no relationship or interference that does not reflect our interests. Without prejudice to the economic and technical conditions, collaborative relationships with suppliers must generate value for both parties. The purchase of goods or the procurement of services must be carried out with objectivity and transparency, avoiding situations that may affect the objectivity of the people involved in them. As a result, they must not involve any family, financial or friendship relationship with the supplier.
2. We only use suppliers that work in accordance with the best practices in ethical, social and environmental matters, as well as in good corporate governance. We also require our suppliers to strictly respect human and labour rights and encourage them to behave in keeping with our values and convey these to their value chain.
3. The values and principles set out in this Code are applied to VidaCaixa Group suppliers through the Supplier Code of Conduct.

#### Transparency in media relationships

When we act as representatives of VidaCaixa at public events, interviews, conferences, courses or in any other circumstance in which it may be understood that our opinions, statements or information disseminated are attributable to VidaCaixa, or if our professional activity or actions, even if one-off, have an impact in the media, we must consult with our superior and, if applicable, with the Communication, Brand and CSR Department, which is responsible for the relationship with the media and the management of VidaCaixa's corporate profiles on the social networks.



### **3.5 Excellence and professionalism**

We work with rigour and efficiency. Excellence forms one of VidaCaixa's fundamental values. That is why we place the satisfaction of our customers and our shareholder at the heart of our professional actions.

#### **I. Service to our customers**

1. At VidaCaixa we place our customers at the centre of our activity. Through this commitment, we create value for our customers and for the area in which we operate.
2. We are committed to acting in an honest, responsible and professional manner in all our relationships with customers.
3. The services and products we offer to our customers are launched in the market after being carefully studied.

#### **II. Commitment to our shareholder**

The relationship we maintain with our shareholder is governed by the principles of transparency, proximity and active listening. At VidaCaixa we adopt the highest standards and best practices in corporate governance.

#### **II. Professionalism and teamwork**

1. VidaCaixa's main asset is its people and the values and principles that motivate them. We respect and promote diversity, valuing everyone's capabilities and contributions.
2. As a team, we are guided by a sense of commitment, dedication and a desire for excellence.

### **3.6 CONFIDENTIALITY**

We preserve the confidentiality of the information entrusted to us by our shareholder and customers.

1. The confidentiality of the information relating to our customers, employees, members of the governing and management bodies, suppliers and shareholder is the cornerstone of the relationship of trust that is the essence of our business.
2. The regulations in force and the internal rules on personal data protection and privacy must be respected.
3. VidaCaixa fully protects the personal information of its customers, shareholder, employees, members of its Governing Bodies and any individual or legal entity with whom it has a relationship. VidaCaixa also requires third-party suppliers or companies with which it has a relationship to preserve the confidentiality of the information to which they may have access as a result of their contractual relationship with VidaCaixa.
4. The people to whom the code applies will only use the information received from the shareholder, customers, suppliers, Governing Bodies and employees for the purpose for



which it was transmitted, all in accordance with the regulations in force in this area. We will never access information that is not strictly required for the performance of our work. Before transmitting information to third parties, the people to whom this code applies must ensure that they are authorised and that there is a legitimate reason for this transmission. Even if they are authorised, the amount of information disclosed must be limited to that strictly necessary. If they have any doubts, they must consult their hierarchical superior or, depending on their identity, VidaCaixa's Information Security Department or the Data Protection Officer.

### **3.7 Social responsibility**

We are committed to society in the performance of our activity.

#### **I. Social and environmental responsibility**

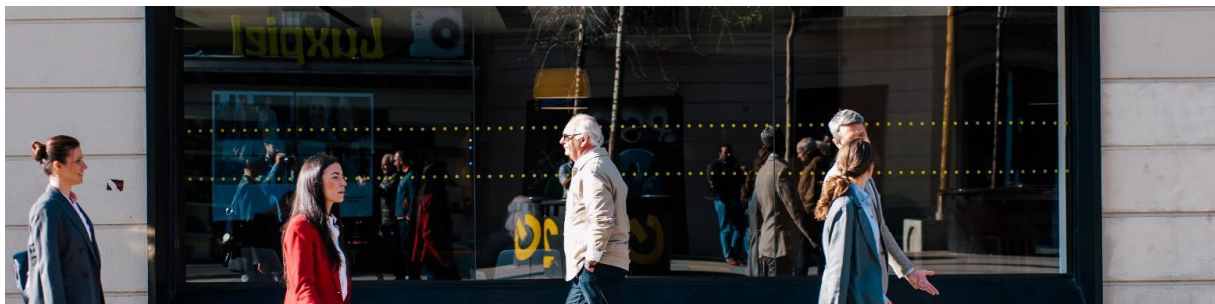
1. In addition to financial profit, it is essential to integrate into our objectives a respect for human rights, equal opportunities and environmental sustainability. This maximises the creation of shared value for the stakeholders and builds long-term relationships based on trust and transparency.
2. We must manage the business and its products and services within the framework of our commitment to respect for the environment and people. We must consistently support initiatives and projects that are more respectful of the environment and that contribute to preventing, mitigating and responding to climate change. VidaCaixa will contribute to the transition towards a carbon neutral, sustainable and inclusive economy.
3. We must act in a manner consistent with the Principles of Action on Sustainability and the Principles on Human Rights. VidaCaixa is a signatory to the main international environmental commitments: The UNEP FI (United Nations Environment Programme Finance Initiative) Principles for Responsible Investment (PRI) and Principles for Sustainable Insurance (PSI), among others.
4. We must act in a manner consistent with the Sustainability Principles, the Human Rights Principles, the Sustainability Risk Integration Policy and the Engagement Policy.

#### **II. Joining national and international initiatives**

We have joined the United Nations Global Compact Principles. Becoming a signatory to these principles involves making a comprehensive commitment to social responsibility and sustainability with the intention of implementing this attitude throughout our value chain.

We are also a signatory to the main international environmental commitments: the UNEP FI (United Nations Environment Programme Finance Initiative) Principles for Responsible Investment (PRI) and Principles for Sustainable Insurance (PSI), among others.

We take part in numerous relevant alliances and initiatives, both nationally and internationally, aimed at jointly advancing sustainability issues and sharing best practices in this field.



#### **4. REGULATORY COMPLIANCE FUNCTION**

The mission of the Regulatory Compliance Function is to identify, evaluate, monitor and report on the risks of sanctions or financial losses to which the company is exposed as a result of non-compliance or defective compliance with laws, regulations, judicial or administrative requirements, codes of conduct or ethical standards and good practices related to its scope of action. It also advises, informs and assists the Senior Management and Governing Bodies.

Its mission is carried out through the supervision of the compliance risk derived from the processes and activities carried out; the promotion, encouragement and driving of the corporate values and principles; and the promotion of a culture of control and compliance with the current laws and regulations that allows and supports their integration into the management of the entire organisation.

VidaCaixa's Regulatory Compliance Department prepares, evaluates and encourages the implementation of the provisions of this Code of Ethics, promoting a culture of compliance across the organisation through training, information and awareness-raising actions. It also answers queries about its interpretation through the internal channels provided.

#### **5 Internal information system - Whistleblowing Channel**

To support compliance with this Code of Ethics and the rest of the internal implementing regulations, VidaCaixa has an Internal Information System that brings together the various internal information channels. The main channel is the Whistleblowing Channel, which allows for the reporting of actions or omissions that may constitute breaches of European Union law, or that may amount to serious or very serious criminal or administrative offences, in accordance with the Corporate Internal Information System Policy. It also serves as a means to enable swift and confidential communication of potential irregularities that may constitute breaches involving acts or conduct, whether current or past, relating to the areas covered by the Code of Ethics and the Rules of Conduct outlined in the aforementioned Policy. Reports may be submitted anonymously.

Reports are managed and resolved using a rigorous, transparent and objective procedure, always protecting the confidentiality of the people concerned and involved in the events and behaviours being reported.

VidaCaixa expressly bans and will not tolerate any retaliation against people who, in good faith, report events or situations that could represent conduct prohibited by this Code of Ethics. In this regard, VidaCaixa works continuously to align our communication channels with best practices at all times.

Customer complaints and claims will be handled through the customer service channels made available by VidaCaixa.

The Channel can be found through the VidaCaixa Intranet and website, from the supplier portal in the case of suppliers and through the Internet.

## **Appendix 1 - Decision-making guide**

If you are faced with a dilemma when exercising your professional activity and you have to make a decision, apply common sense and consider the following questions when evaluating it:

- ✓ Is this decision/action/omission legal?
- ✓ Would I feel comfortable explaining this decision/action/omission to colleagues, managers, family or friends?
- ✓ Have I considered the interests of all those who could be harmed by this decision/action/omission?
- ✓ Am I sure I am doing the right thing?
- ✓ If my behaviour were to become public, would it be considered appropriate and professional?
- ✓ If the answer to any of the questions is “NO”, the matter should be rejected or you should seek advice.

In either case, you can use the Queries Channel or the Whistleblowing Channel.