

Table of Contents

- 1** INTRODUCTION 2
- 2** PURPOSE AND SCOPE OF APPLICATION 2
- 3** OPERATING PRINCIPLES 3
- 4** HUMAN AND LABOUR RIGHTS 3
- 5** ETHICS 3
- 6** HEALTH AND SAFETY 4
- 7** ENVIRONMENT 5
- 8** CONFIDENTIALITY, PRIVACY AND CONTINUITY 5
- 9** CRIMINAL PREVENTION 5
- 10** ADHERENCE AND COMPLIANCE WITH THE CODE 6

1 INTRODUCTION

Banco BPI, S.A. (hereinafter referred to as "BPI", the "Entity", "Institution" or "Bank") is a CaixaBank Group credit institution which carries out banking activities, including all ancillary, connected, or similar operations compatible with such activities and permitted by law, and which adopts, with due proportionality, the corporate policies of CaixaBank.

CaixaBank has a Supplier Code of Conduct, applicable to all Group entities, namely its subsidiaries, which defines the fundamental principles of the purchase management model.

In this context, this Supplier Code of Conduct (hereinafter referred to as the "Code") is aligned with CaixaBank's Supplier Code of Conduct and aims to disclose and promote the ethical values and principles that will guide the activity of its Suppliers of goods and services (hereinafter referred to as "Suppliers").

BPI has as a general principle, the contracting of Suppliers who value the best practices in ethical, social, and environmental matters, as well as an adequate corporate governance. Similarly, Suppliers will have to respect fundamental human and labour rights when carrying out their activities and will strive to extend these to their value chain.

The principles established in the Code will be adjusted and consistent with the principle of proportionality, and its application must consider the size, internal organization, nature, scale, and complexity of the activities performed by the Suppliers providing the services.

[TABLE OF CONTENTS](#)

2 PURPOSE AND SCOPE OF APPLICATION

1. BPI considers its Suppliers as an indispensable part in achieving its growth objectives and improving the quality of service, establishing relationships of trust and coherence with its values.
2. Compliance with the principles and guidelines that are described in this Supplier Code of Conduct constitutes a fundamental element in the selection and assessment of Suppliers.
3. It is fundamental for BPI that Suppliers guide their actions based on principles of integrity, responsibility and diligence, following correct guidelines of market conduct.
4. BPI's activity is governed by strict and rigorous compliance with the legislation in force. Consequently, BPI requires its Suppliers to refrain from practices or conduct, expressly or tacitly through any illicit or criminal act, to obtain an undue benefit, materialised in revenue, cost reduction or any other type of competitive advantage.
5. Similarly, BPI expects its Suppliers to promote the principles included in this Code throughout the value chain.
6. BPI promotes communication with Suppliers, so that Suppliers know and understand this Code and can ensure its compliance. Likewise, each Supplier is responsible for ensuring that its Employees understand and comply with this Code.
 - The provisions of this Code do not replace the specific requirements set out in contracts but are deemed to complement them. If a contractual provision is more rigorous, the Supplier shall comply with the contractual terms established.
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[TABLE OF CONTENTS](#)

3 OPERATING PRINCIPLES

The Supplier Code of Conduct determines specific guidelines in the following areas:

- Human and labour rights.
- Ethics.
- Health and Safety.
- Environment and quality.
- Confidentiality, privacy, and continuity.

[TABLE OF CONTENTS](#)

4 HUMAN AND LABOUR RIGHTS

1. BPI demands that its Suppliers strictly respect human and labour rights, encouraging them to include behaviours in line with its values in their practices and to transmit them to their own value chains.
2. Therefore, Suppliers must comply with all applicable local and national laws and regulations concerning labour practices, benefits, health and safety of their Employees and anti-discrimination practices of the countries in which they operate, produce or carry out their business activity, avoiding any action that is not adjusted to the applicable labour standards. In addition, Suppliers should:
 - Recognise freedom of association, trade union freedom and the right to collective bargaining, in accordance with the legislation in the country in which they carry out their activity.
 - Prevent discrimination in labour and employment based on gender, gender identity, race, colour, nationality, creed, religion, political opinion, affiliation, language, age, sexual orientation, marital status, disability, impairment and other circumstances protected by law.
 - Avoid complicity in any form of human rights abuses and advocate the elimination of forced and compulsory labour and the effective abolition of child labour. Do not hire minors below the legal minimum age for work in accordance with applicable local or national legislation and in no case below the age of 14 (in accordance with C138, Minimum Age Convention of the International Labour Organisation).
 - Comply with the labour legislation applicable at each moment.
 - Prevent any practice involving threat, force or any kind of intimidation, retaliation, or abuse of power for the purpose of exploitation and forced labour of employees.
 - Promote equal opportunities for employees of different genders, in accordance with the laws and agreements signed with employee representation. Accordingly, they guarantee a working environment free of harassment, intimidation and offensive or inappropriate conduct of any kind, including proposals or suggestions of a sexual nature, graphic material and other actions that may offend the dignity of the person.

[TABLE OF CONTENTS](#)

5 ETHICS

1. BPI does not tolerate any form of corruption, bribery or money laundering originating from criminal or illicit activities. BPI does not accept conduct which is not in line with current legislation on the grounds that it is acting in accordance with the interests of BPI, irrespective of the economic or other benefit resulting therefrom.

2. Suppliers must carry out their activities with integrity, transparency and with the highest level of business ethics.
3. BPI has a Code of Conduct, ethical standard and good practices¹ that highlights the values (quality, trust, and social commitment) and the ethical principles that inspire their activity and that should guide its activity. These principles are complying with legislation, respect, integrity, transparency, excellence and professionalism, confidentiality, and social responsibility. For that reason, it is vital for BPI that its Suppliers are aligned with these values and principles.
4. BPI is an entity committed to the fight against corruption in all its forms, including extortion and bribery. BPI has an Anti-Corruption Policy², which constitutes an essential tool to prevent the entity and its Employees from incurring in conduct contrary to the legislation and to BPI's basic operating principles. Accordingly, BPI requires that its Suppliers adopt the necessary measures to ensure behaviour and fair competition on the market, thus avoiding incurring in conduct contrary to current legislation and to the principles which guide its activity.
5. Suppliers shall establish mechanisms to fight against all forms of corruption, extortion, price fixing and/or anti-competitive behaviour, embezzlement, forgery, bribery, money laundering, terrorist financing or influence peddling.
6. Suppliers must not accept or offer gifts, benefits, favours or agreements with the aim of improperly influencing their commercial, professional or administrative relationships.
7. Suppliers must avoid becoming involved in situations, real or potential, of conflict of interest between their Employees and BPI and maintain mechanisms which, in the event of a potential conflict of interest, guarantee the independence of the Supplier's actions. Any person affected by this conflict of interest must refrain from intervening or participating in the negotiation in question.
8. Suppliers must safeguard BPI's image and reputation in their professional activities.

TABLE OF CONTENTS

6 HEALTH AND SAFETY

1. Suppliers undertake to respect the labour legislation and regulations of the country where they provide the service.
2. Suppliers shall promote safe and healthy workplaces, undertaking activities necessary to reduce the risk of accidents, injuries and exposure of their employees.
3. Suppliers shall provide safety information regarding known workplace risks and Supplier's Employees shall receive training to ensure they are adequately protected. Suppliers shall detect and assess likely and potential emergency situations in the workplace and minimise their impact.

TABLE OF CONTENTS

1 - BPI's Code of Ethics and Operating Principles
<https://www.bancobpi.pt/grupo-bpi/etica-e-deontologia/codigo-etico-principios-atuacao-banco-bpi>
2 - BPI's Anti-corruption Policy
<https://www.bancobpi.pt/grupo-bpi/etica-e-deontologia/politica-anticorruptcao>

7 ENVIRONMENT

1. Suppliers must ensure compliance with applicable environmental legislation and provide their services and activities in a way that respects the environment in all regions where they carry out their activities. In addition, Suppliers should:
 - Carry out their activity considering the significant opportunities and risks from an environmental perspective.
 - Strive to minimise their direct negative impact on the environment.
 - When applicable, use environmentally friendly technologies.
2. In cases where the Supplier's activity and the nature of the services provided have a significant impact on the environment, BPI may request information on the preventive measures applied and the processes to identify, manage and minimise the negative environmental impacts of its activities.
3. Suppliers should favour the rational use of energy and efficient use of basic resources by maintaining a preventive approach that reduces the environmental impact of their operations and safeguards natural resources.

[TABLE OF CONTENTS](#)

8 CONFIDENTIALITY, PRIVACY AND CONTINUITY

1. BPI requires that its Suppliers preserve the confidentiality of the information made available to them during their contractual relationship with BPI.
2. Suppliers must comply with the legislation on data protection, privacy, and information security applicable in the countries in which they operate and with the clauses governing the relationship between the Supplier and BPI.
3. The Suppliers undertake to process the personal data solely in accordance with BPI's instructions, as well as ensuring that the persons authorised to process the data undertake to respect its confidentiality. The Suppliers also undertake to adopt the appropriate technical and organisational measures, for the purpose of ensuring the adequate security and confidentiality of the personal data that BPI discloses to them within the scope of the contractual relationship established.
4. When applicable, Suppliers must have business continuity and technological contingency plans that guarantee the continuity of the services provided.
5. Suppliers must protect and respect all intellectual property rights of BPI.

[TABLE OF CONTENTS](#)

9 CRIMINAL PREVENTION

1. BPI has a Criminal Prevention Model, the objective of which is to prevent and avoid the commission of crimes at the heart of the organisation, in accordance with the provisions of the Criminal Code regarding the criminal liability of legal persons. For this reason, BPI has reinforced its organisation, prevention, management and control model which is designed in perfect alignment with the compliance culture that sustains decision-making at all levels at BPI.

2. Accordingly, BPI has approved a Criminal Compliance Policy which establishes that its general principles must also be complied with by its Suppliers. These principles include the promotion of a corporate culture of prevention and intolerance towards illegal or fraudulent acts and the obligation of all people under their responsibility to report any event that could potentially constitute a crime, fraud or irregularity.

[TABLE OF CONTENTS](#)

10 ADHERENCE AND COMPLIANCE WITH THE CODE

1. Compliance with this Code is mandatory for BPI's Suppliers. Suppliers formally commit to its compliance when they are registered on BPI's Approval Platform for Suppliers or in the formalisation/renewal of their contracts.
2. Suppliers must establish adequate mechanisms for the effective promotion of this Code among their Employees, mainly among those who develop activities for BPI. In turn, Suppliers shall ensure that their own Suppliers are subject to principles of conduct equivalent to those established by this Supplier Code of Conduct. BPI reserves the right to audit its Suppliers or, where appropriate, to request that they demonstrate effective compliance with the provisions of this Code.
3. Failure by the Supplier to comply with this Code may have consequences for the contractual relationship with BPI. Depending on the severity of the breach, these consequences may range from a warning to early termination of the contract, without prejudice to other applicable judicial or administrative actions. This will be provided for in the contract with the Supplier.
4. Suppliers must conduct an internal control of compliance with this Code and proactively communicate to BPI any non-compliance detected, especially when it may result in a direct or indirect economic, legal, or reputational impact.
5. BPI provides its Suppliers with channels through which they can communicate any event likely to be contrary to the provisions of this Code, including suspicions of fraud and criminal conduct, as well as for the submission of any enquiries which may arise concerning compliance with the Code.
6. The Compliance Department is responsible for receiving the enquiries and complaints referred to in this Code and for managing them in accordance with BPI's interests and needs. For this purpose, it will apply the best practices of integrity and confidentiality.

[TABLE OF CONTENTS](#)

Supplier Code of Conduct