


CODE OF CONDUCT FOR SUPPLIERS OF THE BANCO SABADELL GROUP

A close-up photograph of a silver metal drill bit resting on a white architectural blueprint. The blueprint is spread on a light-colored wooden surface. In the background, a pair of red-handled pliers is partially visible. The image is part of a larger graphic with blue and teal diagonal stripes.

Banco Sabadell Group, through its parent company, Banco de Sabadell, S.A., as part of its commitment to ethics and to its compliance with the legislation in force, has adhered to the United Nations Global Compact, whose ten principles include the protection of human rights, the elimination of forced labour and child labour, freedom of association, the abolition of discriminatory practices in the workplace, environmental responsibility and the fight against corruption.

As part of this commitment, the Banco Sabadell Group has adopted a Code of Conduct, the purpose of which is to define the criteria to be followed by all members of the Group in order to behave ethically and responsibly, both in relationships within the Group itself and in those with customers, suppliers, shareholders, investors and other stakeholders, and has established policies and procedures to demand the appropriate level of commitment to this code from its suppliers.

In order to guarantee the appropriate implementation of the above commitments, the Banco Sabadell Group has approved this Code of Conduct for Suppliers, which stems from the general Code of Conduct and which aims to guarantee that its suppliers carry out their business activity respecting these principles of action. Otherwise, the Group will refrain from dealing with suppliers known to be in breach of any of its principles, duties or obligations and reserves the right to use available legal mechanisms to terminate the business relationship with the supplier in the event of non-compliance.

What do we offer our suppliers?

The Banco Sabadell Group has adopted a Code of Conduct, applicable to all the jurisdictions and territories in which it carries out its activity, and addressed to all people who have dealings with the bank, including its external suppliers. In this code, the Group expresses its commitment to act in accordance with a series of principles that make up its corporate culture, including professionalism, ethical behaviour based on equity, honesty and transparency in its actions, and compliance with both applicable legislation and internally established regulations.

As part of this commitment to ethics and compliance, the Group's companies have a Criminal Liability Prevention Model, which contains the elements established by legislation, doctrine and jurisprudence and whose ultimate aim, within the principle of zero tolerance for criminal acts and irregular behaviour, is to develop an ethical corporate culture that respects legislation and internal regulations. The Corporate Ethics Committee is at the apex of this model, designated as its supervisory and control body and the highest body responsible for ethics and conduct.

The Group also has a whistle-blowing channel (<https://canaldenunciasgrupo.bancsabadell.com>), open to all its members and to third parties with which it has dealings, where any act or indication that involves or may involve a criminal offence or a breach of the Code of Conduct and of any other internal regulations must be reported. This channel allows the submission of nominative or anonymous complaints and guarantees both the protection of the data collected and the identity of the whistle-blower and the person reported under the legally established terms, as well as the absence of reprisals for the whistle-blower as long as its use complies with the principles of good faith.

Banco Sabadell Group has a whistle-blowing channel for reporting non-compliance:
<https://canaldenunciasgrupo.bancsabadell.com>

For the Group, our relationships with our suppliers must be based on professionalism, mutual respect and recognition of the achievement of the legitimate benefit of both parties, ensuring compliance with the agreed commitments. In this regard, we undertake to make the corresponding payments for the purchase of goods or the provision of a service in strict compliance with the agreements with suppliers regarding price, payment terms and other conditions established at the time of negotiation.

In order to promote the appropriate competitiveness, we give all suppliers bidding for the same goods or services the same opportunities to submit their bids, conducting procurement processes with potential and current suppliers in an atmosphere of good faith, complete independence of decision and free from any family, economic or friendship ties. In this regard, we provide the same information to all competing suppliers, and it is strictly forbidden to provide suppliers with information about their competitors.

The selection and subsequent development of relationships with suppliers by the Group shall therefore be framed within the applicable legislation, the internal rules, the principles reflected in this Code and Banco Sabadell Group's Code of Conduct.

What do we expect from our suppliers?

To share our principles and, in accordance with their structure and size, to have their own Model for the prevention of criminal liability or, failing that, to commit to acting without contravening legal regulations, endorsing the principles and terms of the Banco Sabadell Group's Criminal Liability Prevention Policy.

To work with their own suppliers and subcontractors to ensure that they all strive to comply with the principles of this Code in the following areas:

-Human rights: to promote and respect the protection of human rights as proclaimed in the main international instruments and to ensure that they are not complicit in any form of human rights abuse.

-Harassment, degrading or inhumane treatment: to maintain a working environment in which all workers are treated with dignity and respect.

-Child labour: in accordance with ILO Convention No. 138 on Minimum Age and ILO Convention No. 182 on the Worst Forms of Child Labour, not to employ children below the legal minimum working age, and under no circumstances under the age of 15.

-Forced labour: in line with ILO Convention No. 29 on Forced Labour and ILO Convention No. 105 on the Abolition of Forced Labour, to prohibit all forms of forced labour, bonded or indentured labour and ensure that all work, including overtime, is voluntary and that workers are free to leave their jobs provided they comply with legally established notice periods.

-Pay and working hours: to comply with all applicable laws on pay and working hours, respecting ILO Conventions No. 14 and 106 on weekly rest.

-Equal opportunities: to treat their employees fairly, without discrimination on grounds of gender, race, colour, age, social origin, religion, nationality, sexual orientation, political opinion, physical or mental disability, or trade union membership (ILO Convention No. 100 on Equal Remuneration and ILO Convention No. 111 on Discrimination).

-Freedom of association and the right to collective bargaining: to respect the right of employees to freely associate, organise or bargain collectively in accordance with the law of the country in which they work (ILO Convention No. 87 on Freedom of Association and Protection of the Right to Organise and ILO Convention No. 98 on the Right to Organise and Collective Bargaining).

-Health and safety: to provide their employees with a safe working environment, complying with all applicable laws and regulations.

-Environment: to comply with the applicable legislation on environmental protection in each country in which they carry out their activities, endeavouring to:

- Handle, store and dispose of hazardous waste safely.
- Reduce atmospheric emissions.
- Minimise waste and contribute to the recycling and reuse of materials and products.

Use environmentally friendly technologies.

We rely on our suppliers to cooperate with us as much as possible and to fully share our principles.

Compliance with the Code

Banco Sabadell Group reserves the right to carry out, its own or third-party reviews to ensure compliance with this code of conduct, facilitating access to the documentation and the means necessary to ensure this process.

Suppliers have the right to know this Code and the duty to comply with its contents for the duration of the contractual relationship by expressly and irrevocably accepting it.