

cecabank

Code of conduct



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íntegros rigurosos
veraces
Somos
honestos
comprometidos responsables

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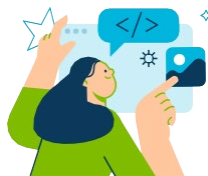
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01

Introduction



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Cecabank Culture
Statement

Introduction

Cecabank's corporate culture is founded on the fundamental principle of adhering to the highest standards of conduct.

Key pillars of our approach to business include compliance with the applicable laws, equal opportunity and non-discrimination, respect for people's dignity and their inherent individual and collective rights, as well as a commitment to sustainability in all its dimensions.

The specific values guiding our management philosophy are outlined in our strategic plan and the Cecabank Culture Statement, which sets out the desired behaviours expected of the company's employees, derived from the aforementioned values.

Cecabank will provide the necessary resources to ensure that all individuals, whether acting as a result of their functional relationship and responsibilities with the entity or in situations where their actions might be attributed to Cecabank or impact its reputation, can understand and comply with the contents of the Code.

02

Cecabank and its conduct as a company



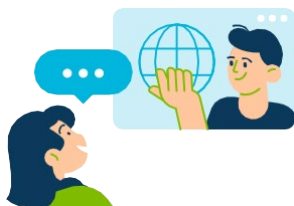
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Cecabank and its conduct as a company



Always keep in mind our approach to banking, based on:

- Ethical integrity
- Transparency
- Respect
- Confidentiality



You can raise any questions and concerns in the Corporate Conduct (Whistleblowing) Channel, which ensures confidentiality.

At Cecabank we aspire to contribute value to the financial system and to, thus, contribute to the generation of well-being in society. Achieving this goal requires a way of banking for all individuals within the organisation that is grounded in ethical integrity, compliance with the applicable laws, transparency, respect for the confidentiality of information, adherence to free market competition, the ethical and appropriate management of potential conflicts of interest, the responsible use of privileged information, and other principles.

What is the expected conduct?

Under no circumstances will we resort to unethical practices to influence the decisions of individuals inside or outside the organisation in order to gain some benefit.

We have a Corporate Conduct (Whistleblowing) Channel where you can report such practices if they occur. The operation and features of the Channel are governed by Cecabank's internal regulations.

Intellectual property

We are committed to ensuring that the information used is not subject to copyright and, where applicable, to using it within the scope permitted by the corresponding licence. The bank will provide the necessary tools to facilitate these verifications. Special attention will be given to the intellectual property of content and works generated through new Artificial Intelligence systems.

We will always respect the organisation's intellectual property by not using it outside the professional context related to the organisation and preventing its unauthorised use by third parties. Where applicable, the appropriate compensation will be required.



We will process personal data in a fair and lawful manner

Data protection

We will strictly adhere to applicable regulations and professional confidentiality regarding personal data, as well as the obligation to safeguard it.

We will collect and process personal data in a fair and lawful manner. Data may only be collected, directly or indirectly, for specific, explicit, and legitimate purposes determined by the data controller or processor.

In line with the organisation's procedures, we will ensure that personal data is accurate and kept up to date, reflecting the affected individual's current situation truthfully. We will also process the data in a way that guarantees its security and prevents unauthorised alteration, processing, or access, all in accordance with the relevant data protection regulations in force.

Prevention of fraud, corruption and bribery



[Criminal Enforcement Policy](#)

Cecabank adheres to a principle of "zero tolerance" for any form of corruption, fraud, bribery, or commission payments, whether through actions, omissions, or the creation or regular practice of favourable or irregular situations aimed at obtaining any benefit for the organisation or its professionals.

Cecabank has procedures and controls in place to prevent this conduct, developed within the framework of criminal risk organisation and management.

The Corporate Conduct (Whistleblowing) Channel is the tool available to report any suspected fraud or corruption. Its purpose is to ensure adherence to the values, standards and principles outlined in the Code, as well as to any other internal code of conduct or applicable laws.



Remember that the [Corporate Conduct \(Whistleblowing\) Channel](#) is the tool for reporting any suspected corruption or fraud.



Keep any information and data you work with confidential

Confidential information

We commit to not using any type of physical or electronic information or documentation belonging to another company that may be considered confidential outside the uses for which it was supplied.

We will not disclose or use confidential or sensitive information from Cecabank or other companies or entities to which we may have access due to our professional performance.

We will respect the provisions of internal regulations, contractual agreements and applicable legislation.

Once the contractual relationship with the entity has ended, we will deliver all the professional documentation, including confidential or sensitive documentation, as well as the media on which it is stored.

Completeness and veracity of information

We will always convey information truthfully, completely, and clearly, and we will never knowingly provide incorrect, incomplete, inaccurate or imprecise information that could mislead any party involved in legal or business transactions.

We will not share rumours or unverified news about the market, entities, counterparties, or Cecabank's business activities.

To ensure the utmost respect for Cecabank's members, we will not disseminate or contribute, actively or passively, to the spread of rumours that could negatively impact the personal or professional reputation of individuals within the organisation.

In the case of financial information, we are committed to ensuring that it is prepared with reliability and rigour, ensuring it reflects reality to provide a true and fair view of Cecabank's assets and financial situation.



Always keep in mind that you represent Cecabank's image and values

Reputation and image of Cecabank

Cecabank, while respecting the fundamental right to freedom of expression, considers social trust and reputation to be among its most valuable assets. Because of this, we will all take the utmost care to preserve the entity's image and reputation in all professional activities, including public engagements such as attending forums, teaching courses, interacting with the media, using social media, participating in recruitment processes, and others.

When publishing information or expressing opinions in a personal capacity, no references should be made to one's status as an employee or any other affiliation that could associate the published content with Cecabank.

Additionally, whether working on-site or remotely, attention will be paid to our appearance and attire as part of Cecabank's corporate image.

Free competition

We are committed to free competition and transparent conduct in the markets, acting in full compliance with CECA's competition compliance policy, as adopted by Cecabank.

We will avoid any actions that violate the provisions of the policy and the applicable laws in this area. In particular, we will not engage in practices that constitute abuse or unlawful restrictions of competition, including misleading advertising or statements that could create confusion about dominance in specific markets.

We will work closely with competition authorities, and in our participation in industry associations, we will avoid making statements or engaging in discussions that could be interpreted as promoting actions harmful to free competition.

Conflicts of interest and market abuse

We will avoid conflicts of interest, which arise when our personal interests or those of our family members or related individuals may compromise our professional objectivity.

Immediate family members¹ of an employee cannot hold positions that are hierarchically or functionally subordinate to their relative. In recruitment processes, they may apply for other positions with the same guarantees and under equal conditions as other candidates.

We will ensure the full exercise of our duties at Cecabank. Accordingly, we may only provide services to non-competing companies or entities, provided such activities do not affect the performance of our work or dedication during Cecabank's working hours.

If we engage in paid activities outside working hours that may relate to the corporate purpose of the Bank, we will inform the "Talent - Culture and General Services Division" in writing, which will provide the corresponding acknowledgment of receipt. The "Talent - Culture and General Services Division" will grant approval after analysing and verifying that such services do not conflict with the Bank's interests. The "Human Resources Department" will have a maximum of one week to carry out this analysis.

In situations that may create a conflict of interest, we will adhere to the conflict management and resolution policies approved by the Bank.

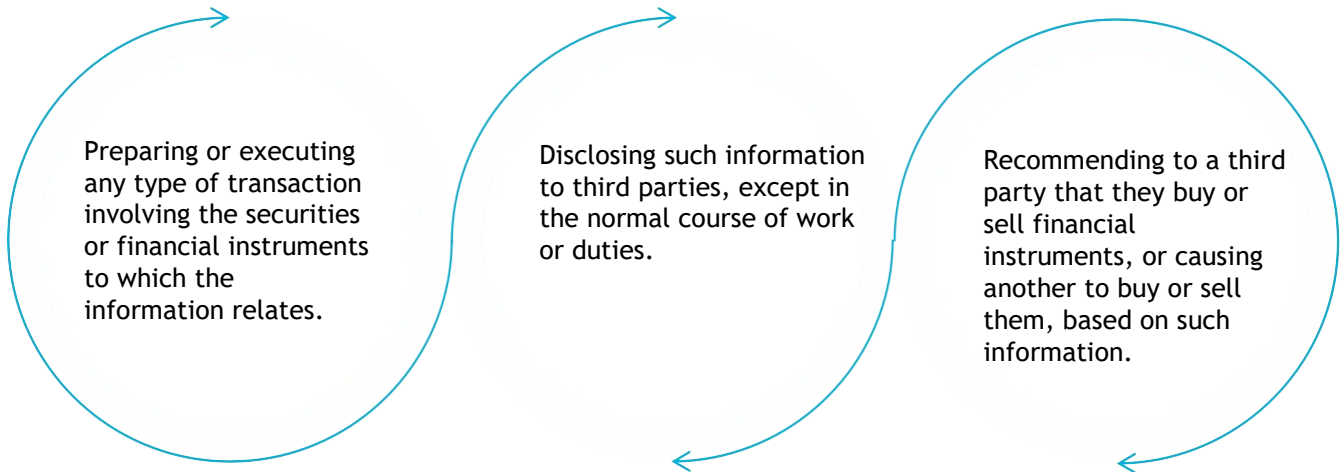
Anyone who is subject to the "Internal Conduct Rules in the Securities Markets" will follow the conflict of interest policy established therein.

¹ "Immediate family member" is defined as a spouse or partner in a similar relationship, father, mother, son/daughter, brother/sister, grandfather/grandmother, grandson/granddaughter, uncle/aunt, nephew/niece, and in-laws of equivalent degree.

02

Cecabank and its conduct as a company

When accessing privileged information, we will refrain from carrying out, on our own behalf or on behalf of others, directly or indirectly, any of the following actions:



If you have access to privileged information, act with integrity and honesty

Those of us who have access to privileged information by any means or for any reason within the scope of our work will notify the "Regulatory Compliance Department" of this circumstance. This duty to report also applies in cases where privileged information is obtained accidentally.

Finally, we will also refrain from engaging in any practices that distort the free formation of prices in the markets.

Control of individual expenses

If, as part of your professional activity, you incur individual expenses, travel expenses, per diems, or similar costs, you must provide truthful justification for expense claims and follow the corresponding policy.



Travel and Representation Expenses Policy

Gifts and presents

A "gift" or "present" is defined as any type of courtesy, favour, or compensation, whether in cash or in kind, given to or received by a professional of the organisation.



We are not authorised to receive any type of remuneration or financing at prices different from market rates from clients or suppliers, nor to accept any external compensation for services related to activities at Cecabank.

The acceptance of any kind of gift, invitation, favour or other compensation from clients or suppliers is contrary to professional ethics, except in cases of generally accepted courtesies or as specified in Cecabank's internal rules outlined in the internal regulations database. If in doubt, check beforehand with the Regulatory Compliance Department.

Any invitation, gift or courtesy that, due to its frequency, nature, or circumstances, could be interpreted by an objective observer as intended to influence the recipient's impartial judgment must be declined and reported to the "Regulatory Compliance Department".

In addition to courtesies, only gifts explicitly authorised on an institutional basis will be offered to third parties, and, if applicable, in accordance with Cecabank's internal regulations.

Use of Cecabank's resources and Cybersecurity



Maintain cybersecurity and stay updated through mandatory internal training.

Cecabank owns the property and usage rights for all assets provided to employees for the performance of their professional activities.

We will use the materials and resources made available to us for professional purposes appropriately and responsibly. In particular, we will use IT tools, mobile devices and email securely and in accordance with the guidelines outlined in the Cybersecurity Policy.

It is our responsibility to stay updated on this subject by taking advantage of the resources provided by the organisation, such as internal policies and cybersecurity training.



Your [development plan](#) is a key aspect of your training and performance.

Promotion of internal training

Cecabank places great importance on staff training and the updating of knowledge and skills to foster professional growth and added value. We will complete all mandatory training necessary for the performance of our professional activities.

Prevention of money laundering and terrorist financing

We will take all measures within our reach to prevent illicitly obtained funds from entering the financial system through Cecabank. To this end, we will strictly adhere to the rules outlined in the manual on the prevention of money laundering and terrorist financing.

We will report any breach of legal regulations or internal policies on money laundering prevention through the Corporate Conduct (Whistleblowing) Channel, anonymously if desired.

03

Our relationship with clients



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The quality of our internal and external service means focusing on our clients

Our relationship with clients

Clients are the core of Cecabank's business and the focus of its activities, as we aim to maintain lasting long-term relationships with them. Business relationships with clients must be governed by the highest standards of quality and transparency, both in pricing and in other terms of the product or service.

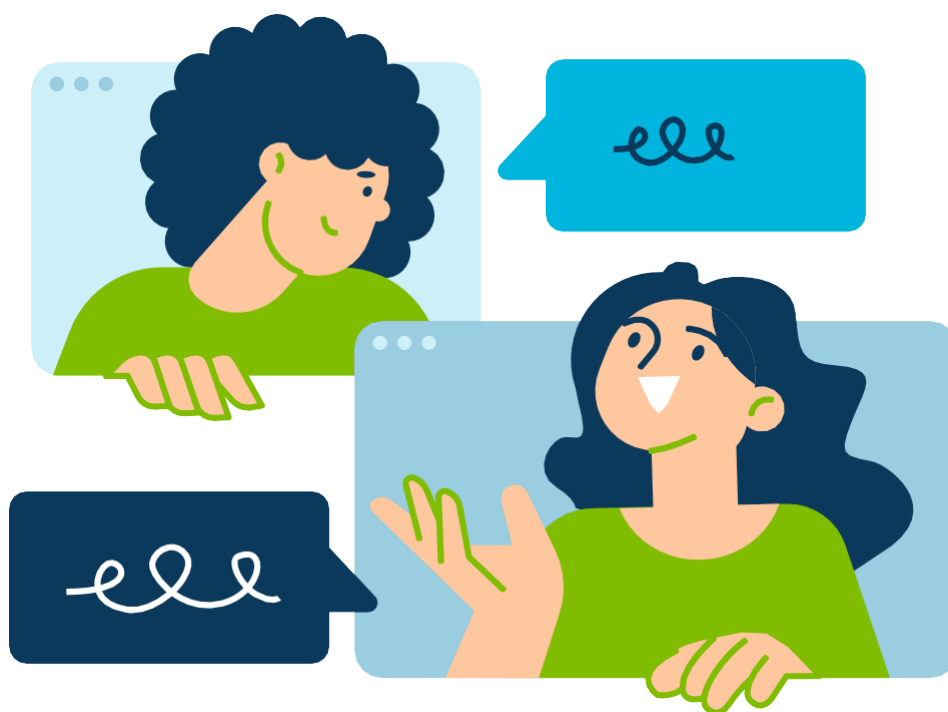
Cecabank provides us with the necessary resources to carry out our activities and to ensure proper customer service and understanding.

What is the expected conduct?

Information and fairness	Offering our products and services	Processing Incidents and Complaints
<p>We will provide clients with impartial, truthful, and accurate information about the various products and services, explaining all relevant elements.</p> <p>We will not offer advantages or benefits to some clients to the detriment of others, nor will we encourage one client to carry out a transaction to benefit another, unless both are aware of their different positions and expressly agree to proceed with the transaction.</p>	<p>When offering products and services to clients, we will ensure that it is done in accordance with established internal procedures, obtaining and retaining the required documentation and providing a copy to the client when applicable.</p> <p>We may not personally accept fiduciary responsibilities, mandates, or powers of attorney from clients to carry out their transactions with Cecabank, except in cases involving family relationships or those strictly necessary for the management of personal or family assets.</p> <p>Additionally, we will seek to avoid exclusive relationships with a client that could result in excessive personal dependence or restrict the client's access to other individuals or channels of Cecabank.</p>	<p>We will channel client incidents and complaints through the departments and contacts designated in each case, always aiming to provide the best service.</p> <p>Cecabank has a customer service department in compliance with Order ECO/734/2004 of 11 March, on Customer Service Departments or Services and the Customer Ombudsman of financial entities, for the purposes established in said regulation.</p>

04

Our relationship with colleagues



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Our relationship with colleagues

The people who work at Cecabank are its greatest asset. For this reason, various policies and initiatives are implemented to promote physical integrity and mutual respect, workplace safety and health, professional development, equal opportunities, and non-discriminatory treatment, among others. These efforts are supported by measures for information, consultation, promotion and training.

Harassment, abuse, intimidation, disrespect, and lack of consideration are unacceptable and will not be permitted or tolerated in the workplace.

The organisation has a protocol in place for handling complaints of workplace harassment, sexual harassment, or harassment based on gender.

Cecabank does not tolerate any form of discrimination based on gender, race, sexual orientation, religious beliefs, political opinions, trade union membership or activity, nationality, social origin, disability, or any other circumstance that could be a source of discrimination.

The dissemination of messages and symbols that incite hatred, discrimination of any kind, or undermine human dignity will not be tolerated.

Cecabank guarantees equal opportunity and is committed to providing the means to support the professional and personal development of its staff.

In order to improve the quality of life of its employees, Cecabank will foster a work environment that supports personal development, helping to balance work requirements with personal and family needs as effectively as possible.

In line with this commitment, the organisation will respect employees' right to digital disconnection as outlined in the current Remote Working Agreement.



Cecabank Remote Working Agreement



Safety Policy

What is the expected conduct?

We will avoid, by all means, engaging in conduct or actions, or provoking them directly or indirectly, that could individually or collectively endanger our own integrity, that of colleagues, and/or that of third parties.

Everyone, especially those in leadership roles, will consistently promote relationships based on respect for others' dignity and the principles of mutual trust and collaboration, fostering a respectful and positive work environment.

04

Our relationship with colleagues



Through your job,
encourage collaboration
with other units and
departments

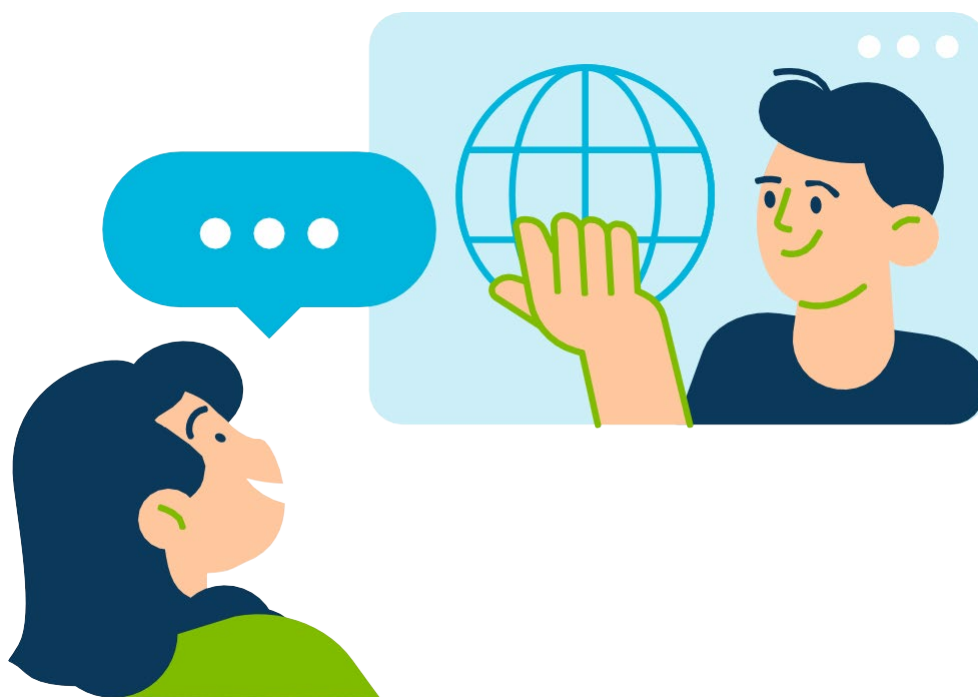
We all have the right to be treated courteously, respectfully, and with dignity. Because of this, we will work together to create and maintain a work environment that fosters such treatment.

We will always act with a spirit of collaboration, sharing our knowledge, skills and talents with those who need them, thereby contributing to the achievement of Cecabank's overall goals and interests.

We will respect the rights to union membership, association and collective bargaining, as well as the activities carried out by workers' representative organisations, in accordance with their legally assigned roles and responsibilities. Cecabank will maintain a relationship with these organisations based on trust and mutual respect, promoting open, transparent and constructive dialogue to ensure labour stability.

05

Our relationship with suppliers

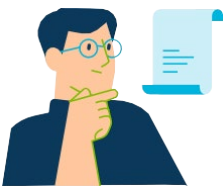
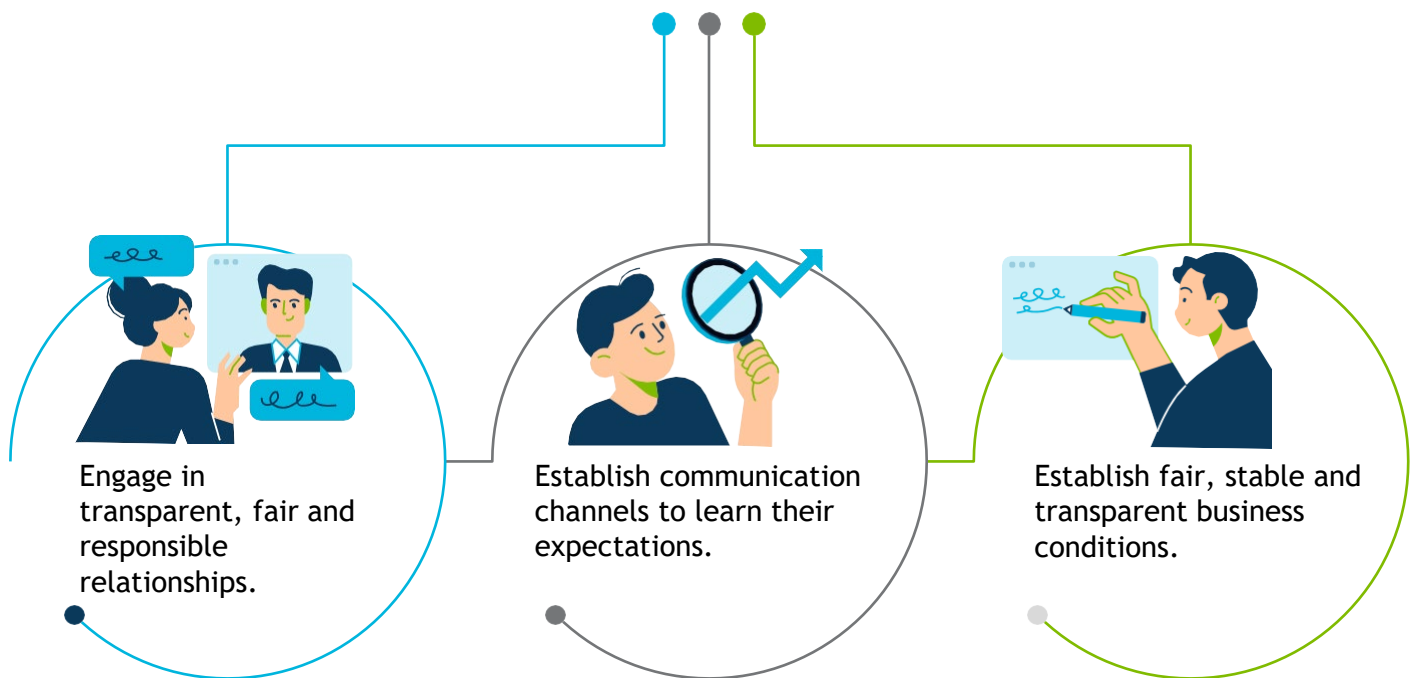


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Our relationship with suppliers



In its business relationships, Cecabank undertakes to:



Annex 1: Supplier Code of Conduct

Cecabank will encourage its suppliers to operate in accordance with the values and principles outlined here. This code includes, as an annex, a Supplier Code of Conduct that sets out the expected guidelines and minimum standards of behaviour involving ethical, social and environmental conduct.

What is the expected conduct?



The procurement of supplies and external services, as well as relationships with suppliers in general, including those providing IT systems and services, must be conducted using transparent procedures and in compliance with internal regulations. We will avoid any interference or influence from clients, suppliers, or third parties that could compromise our impartiality and professional objectivity.



We may only engage with pre-approved suppliers, except in cases where Cecabank's Outsourcing and Service Procurement Policy does not require it.



We will respect the intellectual and industrial property that protects third-party products and services.

06

Our relationship with society

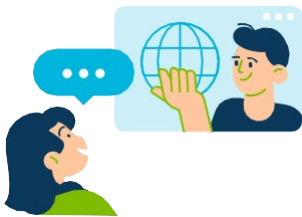


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Take care of and promote sustainability in your workplace

[Sustainability policy](#)



[Human Rights and Responsible and Sustainable Investment Policies](#)



[Environmental Policy](#)

Our relationship with society

Sustainability is one of the core corporate values that defines Cecabank's culture. Through a sustainable business model, the organisation aims to create value in its environment and foster long-term relationships with its stakeholders.

Cecabank's commitment to sustainability and sustainable finance is reflected in various alliances and public commitments.

The organisation adheres to the 10 principles of the United Nations Global Compact regarding human rights, environmental protection, and the fight against corruption and bribery. It is also committed to the decarbonisation of the economy, supporting the objectives of the Paris Agreement, and advancing the United Nations Sustainable Development Goals (SDGs), among other initiatives.

Cecabank's Sustainability Policy outlines the commitments the organisation has made in this area.

The organisation is dedicated to ensuring respect for human rights within its sphere of influence. This commitment is detailed in its Human Rights Policy and Sustainable and Responsible Investment Policy.

Cecabank is committed to the sustainable development of the society in which it operates. Through its various social action programmes, it helps promote plans and initiatives that help improve the economic, social, and cultural environment.

In terms of environmental protection and sustainability, the organisation will comply with applicable regulations and promote the adoption of sustainable practices within its areas of operation and influence. Its policies detail the principles guiding its actions in these matters.

What is the expected conduct?

We must all be aware of the implications that our work and Cecabank's business have on good governance, society, and the environment, as well as the opportunities these considerations can present.

Social Action and donations

Cecabank collaborates with various organisations by making occasional or recurring donations as part of its social action strategy. Any donation made by Cecabank must receive the necessary authorisation.

Donations will only be made to organisations with a good reputation and an appropriate organisational structure to ensure its resources are properly managed.

Furthermore, Cecabank practices political neutrality and will not make contributions or donations to electoral campaigns, political parties, electoral groups, or trade unions.

Likewise, no financial or in-kind contributions will be made to public administrations or organisations, except as legally required or as part of sponsorship collaborations. In such cases, contributions will always be publicly disclosed and included in the entity's management reports.

Social Media



On social media, remember that you act as an ambassador for the organisation

When interacting on professional social media platforms, we must remember that we act as ambassadors for the organisation and represent it in these digital spaces. Therefore, we should be mindful that any statement or publication contrary to the guidelines outlined here could harm Cecabank's image and reputation.

We will always act with respect, caution, and common sense, carefully managing the information we share. Under no circumstances will we publish confidential information about Cecabank, its clients, or its employees.

When publishing information or opinions in a personal capacity, we must be mindful that our views could be interpreted as those of Cecabank.

Relationship with the media

The relationship with the media is managed by the Communication and Brand Department. We will not, on our own initiative or at the request of third parties, share any information, news, or rumours about the organisation or third parties with the media.

If contacted by the media regarding a professional matter, inform your direct supervisor and the Communication and Brand Department before responding. The department will provide guidance on the appropriate steps to take.

07

Scope of application and monitoring of the Code



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Scope of application and monitoring of the Code

The values, principles, and standards outlined herein are mandatory and globally applicable to the members of the Board of Directors, all Cecabank staff, and other personnel within its group.

We must all be familiar with and adhere to this Code in our internal and external relationships with the various stakeholders, which for Cecabank include its shareholders, clients, suppliers, business partners, competitors, and market agents with whom it regularly interacts (such as supervisors, regulators, and clearing houses).

Compliance with this Code does not exclude certain individuals from being subject to the Internal Conduct Rules in the Securities Markets or other specific codes of conduct related to their activities or the applicable legislation in the jurisdiction in which they operate. The most restrictive rule will always prevail.

The commitments assumed in this Code are applicable to the entity's daily operations. Cecabank will provide all staff with the means necessary to understand, receive training on, and comply with the Code.

The Code will also be available through internal and external electronic platforms. Its dissemination will adhere to the procedure laid out in the internal regulations.

The "Talent Management Department" will individually inform all employees of their obligation to adhere to the "Corporate Code of Conduct".

For members of governing bodies, the "General Secretariat" will notify them of their obligation to comply with the Code upon their appointment.

Cecabank has set up a channel (hereinafter "the Channel" or "the Corporate Conduct (Whistleblowing) Channel") to report potential breaches of this Code, acts, events, or significant situations related to non-compliance with the Anti-Money Laundering and Counter-Terrorism Financing Law, actions or omissions covered under the scope of Article 2 of Law 2/2023 of 20 February, regulating the protection of individuals reporting regulatory breaches and corruption, which includes, among others, criminal violations and other infringements under the industry regulations applicable to the bank. Additionally, the Channel makes it possible to submit questions on the interpretation of the Code, the answers to which will be published for the information of all the individuals who are subject to it.



[Corporate conduct
\(Whistleblowing\)
channel](#)

There is a "Corporate Conduct Committee", whose functions include ensuring the proper operation of the Channel in all the previously mentioned areas, guaranteeing that any reported breaches are handled confidentially or anonymously and without fear of retaliation.

Individuals who report or disclose infringements referred to in Law 2/2003 will be entitled to the protection provided and regulated under that law. The organisation will provide whistleblowers with the necessary protection against any potential retaliation they may face for reporting any matters through the Channel.

The chairperson of the "Corporate Conduct Committee" will report at least annually to the Audit Committee of the organisation on the operation and use of the Channel, or any other initiatives for monitoring and enforcing the Code or other matters related to the Channel. This includes the functioning of the whistleblower protection system and data protection aspects associated with the Channel.

What is the expected conduct?

We will take part in all training and awareness sessions held regarding the Code, making every effort to fully understand and comprehend it. We will make use of the opportunity to submit queries to clear up any questions we may have about its interpretation.

We will all commit to complying with the Code and will report, in good faith, any unusual situations or potential violations of its contents.

Cecabank will guarantee the confidentiality of queries, communications or reports made through the "Corporate Conduct (Whistleblowing) Channel".

Cecabank will maintain an up-to-date record of the documents, internal regulations, and reference initiatives related to Cecabank's "Corporate Code of Conduct".



This Code will come into effect the day after it is approved by the Board of Directors of Cecabank. Its relevance will be reviewed at least every three years, and any necessary modifications will be made as appropriate.

08

Reference documents and initiatives



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Reference documents and initiatives

Cecabank's labour agreement on remote working and the right to digital disconnect

[Whistleblower channel](#)

Supplier Code of Conduct

Cecabank's code of conduct for business relationships

Code for the prevention of harassment and protocol of actions in case of sexual harassment and gender complaints

Cecabank Culture Statement

Security document for users

Applicable labour laws, Industry Collective Bargaining Agreement and Company Agreements signed with the representatives of Cecabank's employees

Anti-money Laundering and Terrorism Financing Manual

Criminal Risk Organisation and Management Framework

Internal regulation 01.06 Travel regime

Internal regulation 03.11 Corporate conduct (Whistleblowing) channel

Internal regulation 02.31 Managing access to data files

Internal regulation 02.01 On the responsible use of information and IT resources

Internal regulation 06.18 Selection and evaluation of suppliers

Gender Equality Plan and work-life balance measures

Quality policy

Criminal enforcement policy

Policy for delegating the custody function

Human Rights Policy

Sustainable and Responsible Investment Policy

Policy for outsourcing services and functions

Policies for providing investment services

Environmental Policy

Global security policy

Sustainability Policy

Policy on compliance with competition regulations

Internal Conduct Rules in the Securities Markets

Annex I

Code for Suppliers



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Annex I

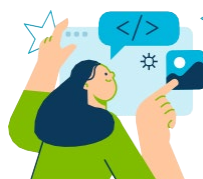
Code for Suppliers

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Communication channels



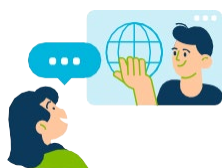
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Purpose



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Adherence, monitoring and compliance with the Code



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Scope of application



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Validity and approval



04

Basic principles of action

Supplier Code of Conduct

Introduction



01

Introduction

Cecabank is a wholesale bank committed to excellence that strives to work with suppliers that conduct their activity in line with its own values and ethical principles.

As a general principle, Cecabank works with suppliers that adhere to best practices in ethics, environmental responsibility, and good corporate governance. Suppliers are also expected to respect fundamental human and labour rights in their activities and work to extend these principles throughout their value chain.

Cecabank promotes the application of these standards based on the guiding principles outlined in the International Bill of Human Rights, the United Nations Global Compact, and the principles and recommendations for business activities published by the United Nations, the Organisation for Economic Co-operation and Development (OECD), and the International Labour Organization (ILO).



02

Purpose

Purpose

This Supplier Code of Conduct (hereinafter referred to as the "Code") aims to establish the guidelines and minimum behavioural standards regarding the ethical, social, and environmental conduct that we expect in the procurement of supplies, external services, and relationships with suppliers. It is fully consistent with the entity's Corporate Code of Conduct, our corporate values, the Criminal Enforcement Policy, and the Sustainability Policy, and must therefore be interpreted in light of these documents.

Cecabank will provide the necessary resources to ensure that suppliers understand this Code and can commit to its compliance. Likewise, we expect our suppliers to adopt the necessary policies and procedures for its proper implementation, engaging in communication and training actions to ensure that their employees understand and act in accordance with the content of this Code.

Annex I

Code for Suppliers



03

Scope of application

Scope of application

This Code is intended for all suppliers involved in business relationships with Cecabank, regardless of their nationality or the location where services are provided.

The conduct criteria outlined in this Code are not intended to cover every possible situation or circumstance Cecabank's suppliers may encounter; rather, they establish minimum conduct guidelines to help suppliers in their professional activities.

Compliance with this Code will be considered by Cecabank during supplier approval, selection, and contracting processes (if applicable), as well as in the subsequent evaluation of the professional performance of its suppliers and collaborators.



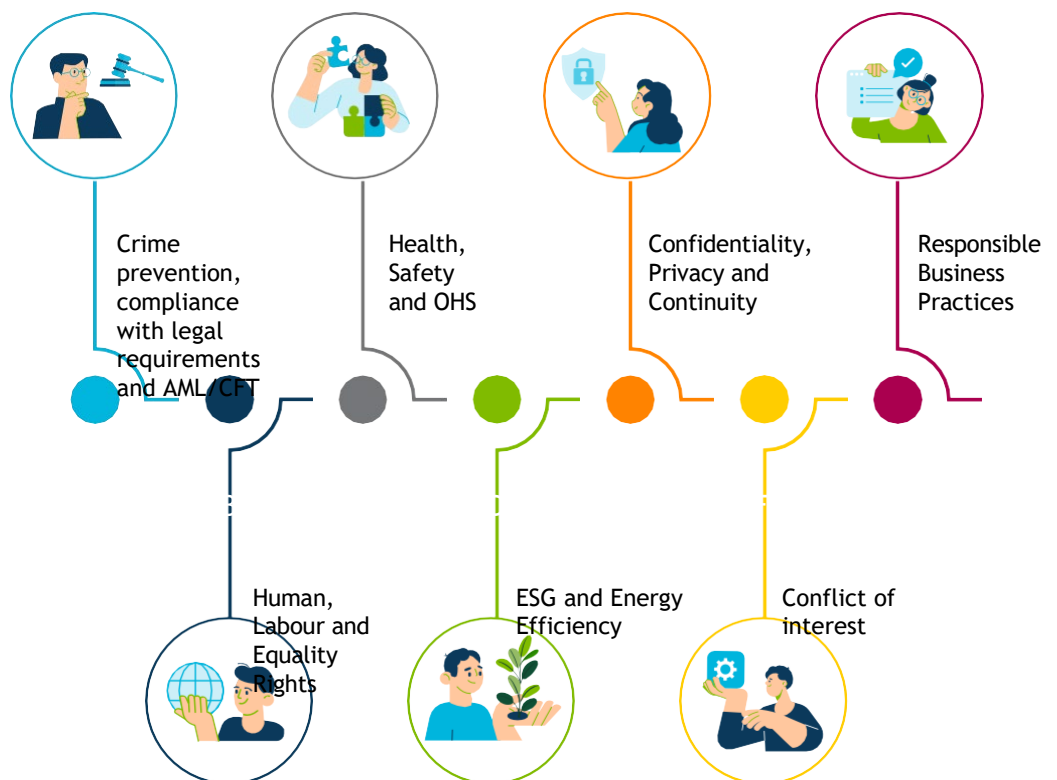
04

Principles

principles of action

Basic principles of action

The Supplier Code of Conduct provides specific guidelines that suppliers must accept in the following areas:



Annex I

Code for Suppliers

Basic principles of action

A



Crime prevention, compliance with legal requirements and AML/CFT

Cecabank's suppliers will respect the laws, rules, and regulations of the countries where they operate and commit to strict compliance with the applicable laws at all times, refraining from engaging in practices or conduct that jeopardise legality or basic ethical principles.

Cecabank has a Criminal Risk Organisation and Management Framework, which includes preventive measures to avoid criminal conduct by its employees and representatives, including those related to the prevention of money laundering and the financing of terrorism.

For its part, the supplier declares that it has a criminal risk prevention system in accordance with the applicable regulations, and it commits to acting in compliance with it. When contractually stipulated, breaches of this commitment may lead to disciplinary measures.

In any case, Cecabank is committed to complying with and adopting appropriate measures to ensure that its employees and subcontractors comply with applicable regulatory requirements to prevent the commission of offences that could impact Cecabank or the services under the contractual relationship.

B



Human, Labour and Equality Rights

Cecabank requires its suppliers to respect human rights and to support and uphold key international agreements and recognised best practices in labour matters, particularly all aspects set out in the United Nations Universal Declaration of Human Rights, the Fundamental Conventions of the International Labour Organization (ILO), and the UN Guiding Principles on Business and Human Rights.

Accordingly, suppliers will

Eliminate all forms or types of forced or compulsory labour

Prohibit child labour.

Recognise freedom of association, trade union freedom, and the right to collective bargaining, in accordance with the laws of the country in which they operate.

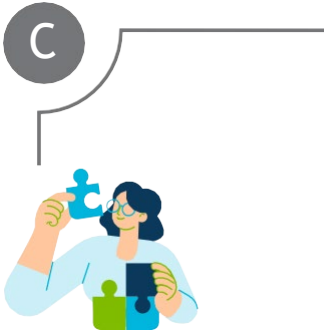
Avoid discrimination in employment and the workplace based on gender, gender identity, race, colour, nationality, creed, religion, political opinion, affiliation, age, sexual orientation, marital status, incapacity, disability, and other situations protected by law.

Comply with applicable labour regulations at all times.

Annex I

Code for Suppliers

Basic principles of action

**Health, Safety and OHS**

Suppliers and their employees will avoid, by all means, engaging in conduct or actions, or provoking them directly or indirectly, that could individually or collectively endanger their own integrity, that of other employees, and/or that of third parties. To this end, they must inform the person responsible within their organisation of any hazardous situation they become aware of while carrying out their work responsibilities, as well as of any potential ineffectiveness or inadequacy of personal or collective protective equipment provided to them.

Suppliers must, in all cases, comply with applicable occupational risk prevention regulations, implementing measures to adequately protect their workers in matters of workplace safety and health.

**ESG and Energy Efficiency**

Cecabank is firmly committed to operating in an environmentally friendly way, working under the precautionary principle and mitigating environmental impact, both in its activity and in its sphere of influence.

Cecabank's Sustainability Policy reflects this commitment by seeking to responsibly and sustainably manage material resources and promote their efficient use.

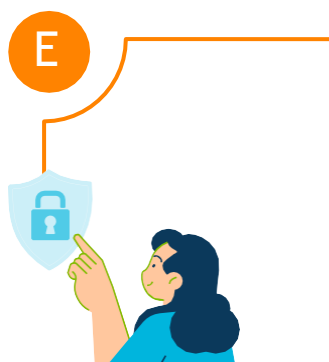
In this regard, Cecabank expects its suppliers to



Annex I

Code for Suppliers

Basic principles of action

**Confidentiality, Privacy and Continuity**

Suppliers must conduct their activities in accordance with the principles of transparency and honesty in any relationship they have with Cecabank.

Information related to Cecabank, its clients, employees, or any third party is confidential. Therefore, Cecabank requires its suppliers to maintain the confidentiality of any information they may access due to the contractual relationship and to comply with applicable legislation on data protection and privacy, including personal data, sensitive business information, or privileged information.

Suppliers commit to processing personal data solely in accordance with Cecabank's instructions and for the purposes contractually agreed upon, always adhering to the applicable data protection policies.

Suppliers must have business continuity and technological contingency plans in place to ensure the continuity of the services provided, where applicable.

Cecabank's intellectual property rights will be protected and respected by all suppliers.

**Conflict of interest**

Sometimes the interests of financial institutions can enter into conflict with those of its clients. To appropriately address these situations, and in compliance with applicable regulations, Cecabank has implemented policies for the proper management of Conflicts of Interest.

Cecabank's suppliers must avoid any situation that could give rise to conflicts of interest, or the appearance of a personal conflict of interest, that might call into question their objectivity or loyalty to Cecabank.

Suppliers must have mechanisms in place to ensure that, in the event of a potential conflict of interest, their actions remain independent and fully compliant with applicable legislation.

**Responsible Business Practices**

Suppliers must comply with applicable legislation in their business practices, ensuring at all times the preservation of the good name and reputation of their clients.

No supplier shall use their position to obtain undue gains at the expense of Cecabank.

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Code for Suppliers



05

Communication channels

Communication channels

Cecabank, in an effort to increase transparency and integrity within the supply chain, provides its suppliers with access to its "Corporate Conduct (Whistleblowing) Channel", through which suppliers can request from Cecabank the necessary information about its Criminal Risk Organisation and Management Framework. Suppliers can also report any illicit activities, whether their own, those of their employees, or their subcontractors, as well as any breaches of this Code. This channel is available on the Cecabank corporate website, on its homepage. Cecabank guarantees the confidentiality of the information provided.



06

Adherence, monitoring and compliance with the Code

Adherence, monitoring and compliance with the Code

This Code is mandatory for Cecabank's suppliers, who are expected to demonstrate a high level of commitment to it.

Cecabank's suppliers agree to comply with this Code upon registering on the bank's Procurement Portal, as well as during contract renewals or any other circumstances deemed appropriate by Cecabank.

Suppliers commit to effectively disseminating this Code through appropriate mechanisms, particularly to employees who perform work and/or provide services for Cecabank.

The Supplier Code of Conduct reflects the principle of due diligence that suppliers, contractors, and external collaborators must apply to prevent, detect, and eliminate irregularities related to breaches of this Code and their own internal regulations, including those concerning criminal offences.

Suppliers authorise Cecabank to monitor compliance with this Code. To this end, Cecabank may request evidence demonstrating adherence to the provisions of this Code.

Cecabank reserves the right to terminate the contractual relationship, provided such a provision exists in the contract, with suppliers who fail to comply with the conduct guidelines and principles contained in this Code. This is without prejudice to any administrative, civil or criminal liabilities that may legally arise from such breaches.

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Code for Suppliers



07

Validity
and
approval

Validity and approval

This Supplier Code of Ethics has been approved by the Board of Directors and will come into effect upon its approval, remaining in force until it is revoked or updated.

The content of this document will be updated and reviewed periodically.



cecabank



Somos
íntegros rigurosos
veraces
Somos
honestos
comprometidos responsables