

CATALOGUE OF CRIMES APPLICABLE TO LEGAL ENTITIES

This document is a translation of Spanish language document. The Spanish version of this document will prevail in the event of any discrepancy or dispute.

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1. Introduction

This document describes the various criminal acts for which a legal entity may be held criminally responsible in Spain.

It is important to note that legal entities, pursuant to prevailing legislation, are not only liable for actions or omissions occurring within Spain, but also, in certain circumstances, for events taking place in any other country.

It is also important to bear in mind that one of the criteria required for accusations to be filed against legal entities is the existence of both a direct benefit (understood as an eventual capital gain for the legal entity) and an indirect benefit (understood as the eventual savings, absence or lack of costs that would otherwise have been incurred by the legal entity to comply with its duties of supervision, oversight and control of its activities, depending on the specific circumstances of each case).

Irrespective of the list given below of crimes that could result in accusations being filed against legal entities in Spain, Banco Sabadell has performed and documented its assessment of criminal risks, and has subsequently prepared a Corporate Crime Prevention Manual, which sets out the crimes that have a greater likelihood of being committed and which could have an impact on the Institution.

2. List of crimes that may affect Banco Sabadell

The criminal risks that have been identified in connection with the activity of Banco Sabadell and its domestic subsidiaries (hereinafter referred to interchangeably as “the Bank” or “the Institution”) are listed below. These are risks which are linked to the type of business activity carried out by the Institution, and they have therefore been subject to a special evaluation and assessment to ensure their appropriate prevention:

- Bribery
- Influence peddling
- Corruption in international transactions
- Corruption in business
- Illegal financing of political parties
- Fraud
- Money laundering
- Financing of terrorism

- Crimes against the market and consumers
- Discovery and disclosure of secrets / Crimes against privacy and the right to self-image
- Crimes against the Tax Authority and Social Security
- Frustration of execution
- Criminal bankruptcy
- Computer-related damage
- Crimes against intellectual and industrial property
- Counterfeit credit cards, debit cards and traveller's cheques
- Currency counterfeiting and securities fraud
- Crimes against urban and land planning
- Crimes against natural resources and the environment
- Crimes against workers' rights
- Obstruction of inspections and supervisory activities
- Rigging of prices in public tenders and auctions
- Crimes against public health
- Crimes related to risk from explosives and other agents of harm
- Hate crimes and extolling terrorism
- Crimes against international citizens' rights
- Illegal organ trafficking
- Embezzlement
- Terrorist crimes

3. Other crimes for which legal entities may be liable

According to the type of business activity engaged in by Banco Sabadell, and although the commission of these crimes does not entail any criminal liability for the legal entity, due to its negative economic and reputational repercussions, and within the Institution's commitment of zero tolerance of criminal activity and conduct, the following actions have also been analysed and studied so that they may be duly prevented:

- Criminal mismanagement
- Misappropriation
- Crimes against moral integrity
- Falsification of documents

4. Charter of behaviour to prevent the commission of crimes.

The following is a non-exhaustive list of core behavioural principles related to crimes for which accusations could hypothetically be filed against the Institution. The Parties Concerned (executives, legal proxies, employees and in general all natural or legal persons providing services to or in the Institution, as well as all partners, suppliers and subcontracted firms) must necessarily observe these principles in all of their interactions between themselves and with third parties and use them as guidelines on how to act at all times, including in situations not specifically envisaged herein.

4.1 Bribery / Influence peddling / Corruption in international transactions

The Parties Concerned shall refrain from offering or accepting inducements, commissions or payments to and from authorities, public officials, public and government bodies, political parties and institutions in general, as well as their representatives, whether national or international, (hereinafter, “Public Administrations”), and they shall also refrain from making any contributions to the foregoing charged to the Institution.

All Parties Concerned who are in contact with Public Administrations shall keep and store all exchanged documents and shall be required to write minutes after any meetings held, giving detailed information about the commitments undertaken by the parties, with the exception of those corresponding to the relationship arising from their status as customers of the Institution; nevertheless, the latter shall also be documented.

Any links to, membership of, or cooperation with, political parties or any other type of entity, institution or association incorporated for public purposes, as well as any contributions made, or services provided, to the foregoing, shall be carried out in a manner that clearly reflects the personal nature of the same, preventing any form of involvement by the Institution.

4.2 Corruption in business

Any procurement of supplies or external services, as well as all relationships with suppliers and service providers in general, shall be carried out using transparent procedures. Standard 7132 “Banco Sabadell Group procurement policy and processes” must be adhered to by the Parties Concerned at all times. The Parties Concerned shall prevent any form of interference or influence from customers, suppliers, service providers or third parties which could affect their impartiality and professional objectivity. This obligation shall particularly apply to the Parties Concerned required to make decisions regarding the procurement of supplies and services, who approve risk transactions requested by companies in connection with the foregoing, and those who decide the economic conditions of transactions with customers.

The Parties Concerned shall not be authorised to receive any form of remuneration or funding from customers or suppliers nor, in general, to receive any form of remuneration from third parties for the provision of services related to their activities. The acceptance by the Parties Concerned of any form of gift, invitation, favour or other compensation from customers or suppliers is contrary to professional ethics, unless they are a symbolic token of appreciation.

Similarly, the Parties Concerned shall refrain from offering gifts, commissions or remuneration to suppliers or customers, unless they are a symbolic token of appreciation.

The Parties Concerned shall not be authorised to accept any form of offer, benefit or advantage in favour of the Institution or to the detriment of third parties.

4.3 Illegal financing of political parties

The Parties Concerned shall be required to comply with the obligations imposed by prevailing legislation relating to the financing of political parties in the form of donations and contributions. Specifically, the Parties Concerned shall be required to adhere to certain behavioural principles when performing their duties, including the following:

- i. No activity of any kind will be carried out which may be directly or indirectly interpreted as a donation to political parties, or as sponsorship

of the causes associated with such parties or with any political campaigns, in the name or on behalf of the Institution.

- ii. No full or partial debt forgiveness shall be granted to political parties. For these purposes, debt forgiveness means the full or partial write-off of the principal of a loan or of any past-due interest, or the renegotiation of an interest rate to one below the rate(s) applicable according to the market conditions at the time.
- iii. Individual donations by natural persons are permitted by law, up to a maximum of 50,000 euros per year, and under the terms and conditions set forth in Organic Law 8/2007 of 4 July, on the financing of political parties.
- iv. The Parties Concerned shall exercise due diligence when assessing transactions or activities in which the counterparty could be a public entity or an institution associated with political parties in order to previously resolve any setbacks which may arise in this regard. In the event of any doubts as to whether a certain action could give rise or be connected to some form of prohibited activity, it is essential that they promptly consult the Corporate Ethics Committee.

4.4 Fraud

The Parties Concerned shall be subject to the principles of clarity and transparency and shall take special care to offer customers only those products and services that are suited to their knowledge and needs, to ensure that products and services are only acquired once the customer has understood their content, benefits, risks and costs. Therefore, notwithstanding this general rule, the Parties Concerned shall:

- i. Inform customers with impartiality and care of the various products and services, explaining all relevant aspects and advising them of the associated risks and the applicable expenses and fees.
- ii. Apply the commercial charges and conditions approved or agreed in each case.
- iii. Refrain from encouraging customers to acquire products or services for the sole purpose of generating fees or income and which hold no real interest for the customer.

- iv. Refrain from offering advantages or benefits to some customers to the detriment of others.
- v. Ensure that products and services are acquired in the manner set forth in internal procedures, obtaining and storing the required documentation and providing customers, where applicable, with a copy of the same.

The Parties Concerned shall not be authorised to act on behalf of a customer unless they have received a written instruction to act on the latter's behalf, and the intended actions must conform to any assumptions or procedures established by the Institution. Neither shall they be authorised to unilaterally modify or edit the data provided by the customer, as it is for the customer to modify such data if necessary.

4.5 Crimes related to money laundering and the financing of terrorism

The Parties Concerned shall be required to fulfil the obligations imposed by legislation on anti-money laundering and combatting the financing of terrorism (hereinafter, "AML" and "CFT"). Specifically, the Parties Concerned shall be under the obligation to strictly adhere to internal standard 4815 "Group Anti-Money Laundering" and 4850 "Policy and procedures for preventing and combatting the financing of terrorism", which set forth, among others, the following mandatory requirements:

- i. To adequately identify all customers.
- ii. To notify the Anti-Money Laundering Unit of any suspicious activity, by sending an email to 09010CI@bancsabadell.com.
- iii. Not to reveal to customers or third parties any control activities or investigations being carried out, and to cooperate with the Anti-Money Laundering Unit and public authorities.

The Parties Concerned shall reject all types of offers or invitations to breach any of their obligations relating to AML and CFT, promptly reporting such actions to the Anti-Money Laundering Unit.

The Parties Concerned shall be required to attend all specific training activities relating to AML and CFT to which they are invited.

4.6 Crimes against markets and consumers (Stock market crime / Misleading advertising)

Any Parties Concerned who access inside information, this being understood as all information, whether of a general nature or referring to specific marketable securities or traded financial instruments, which is confidential and whose publication could substantially influence the quoted price of such securities and instruments in the market (hereinafter, “Inside Information”), must refrain from doing any of the following, on their own behalf or on behalf of third parties:

- i. Carrying out any type of transaction involving marketable securities or financial instruments issued by the company to which the Inside Information refers or involving derivatives with underlying assets in such company.
- ii. Disclosing the aforesaid Inside Information to third parties.
- iii. Recommending a third party to acquire or sell marketable securities or financial instruments based on the aforesaid Inside Information.
- iv. These prohibitions shall be applicable to any employee in possession of Inside Information when such employee knows, or should know, that such information falls under this category.

The Institution has an Internal Code of Conduct in place relating to the securities market that governs the obligations and restrictions applicable to those subject to such Code of Conduct (members of the Board of Directors, management staff and employees whose professional duties and responsibilities are linked to products and services related to the securities market or who have access to material information about the Institution).

Any Parties Concerned who have access to Inside Information through any means shall promptly bring such circumstance to the attention of the Corporate Ethics Committee, by sending an email to 0901CEC@bancsabadell.com and they shall also indicate the source from which the information has been obtained. This duty of disclosure shall also be applicable in cases where Inside Information becomes known by accident, through casual comments, negligence or indiscretion by the persons required to keep such information in confidence. The duties of confidentiality arising from handling Inside Information shall be applicable indefinitely, even after the termination of the relationship between

the Parties Concerned and the Institution, unless such persons have received notification of their removal from any insider lists corresponding to such inside information.

It shall be prohibited for the Parties Concerned to disclose false information or spread rumours which could equally affect the quoted price of securities issued by the Institution or by any other institution or of instruments traded on organised or regulated markets.

It shall be prohibited for the Parties Concerned to convey or provide false or misleading information, or to conduct any other equivalent activity entailing a wilful manipulation of the calculation of a benchmark index.

When performing their duties, the Parties Concerned shall ensure the veracity of the information provided to customers, particularly in relation to the characteristics, terms and conditions of the products and services offered.

Commercial relationships with customers shall be governed by criteria of the utmost quality and transparency, in terms of both prices and all other terms and conditions associated with the product or service. Customers shall be duly informed of offers of products and services, together with the associated risks.

Interactions between the Institution and its Employees with the media shall be carried out following the guidelines of the External Communication and Corporate Image Division.

Advertising will be clear, truthful, objective and it will not be misleading.

4.7 Discovery and disclosure of secrets / Crimes against privacy and the right to self-image

The Parties Concerned undertake not to use, during the term of their employment, any type of information or physical or electronic documentation belonging to any other company obtained through any previous employment or without the latter's consent.

The Parties Concerned are required to guarantee the confidentiality of all types of inside or sensitive information relating to people, firms or institutions to which they may have access by reason of their professional duties.

The Parties Concerned shall not be authorised to publish or make use of such information to the benefit of the Institution or third parties.

Any Parties Concerned who, due to their professional activities, handle confidential, inside or sensitive information of third parties, shall refrain from disclosing such information, pursuant to that set forth in the Internal Code of Conduct.

The duties of confidentiality shall remain in effect indefinitely, even after the employment relationship with the Parties Concerned has ended.

The Parties Concerned shall have the obligation to exercise utmost care and discretion when handling and processing customers' personal data, using such data for the sole purpose of carrying out their professional activities under the terms for which such data have been provided by the customers, without such data being used for any purpose unconnected with the Institution's activities, and without such data being shared with third parties, except where legally required.

All personal data must be processed in a particularly restrictive way, and always in strict compliance with the internal rules on personal data protection, which are set out in the Information Security Procedures Manual, in order to ensure that:

- i. Only strictly necessary personal data are collected.
- ii. The collection, computer processing and use of such data should be carried out in such a way as to guarantee their security, veracity and accuracy, uphold people's right to privacy and ensure fulfilment of the Institution's obligations arising from personal data protection legislation.
- iii. Access to data will only be given to the Parties Concerned who have been authorised to access such data by reason of their roles and responsibilities, and they shall only access this data if it is strictly necessary to do so. All authorisations for the use of personal data must be given in response to specific requests, and any personal data used must also be accurate.
- iv. The Parties Concerned shall keep in the strictest confidence all requests for information and all orders for embargoes or blockades of customers' positions received from judicial bodies, Public Administrations or any other public body. Under no circumstances shall the Parties Concerned reply to the aforementioned requests. Such requests must only be dealt

with following the instructions indicated in internal standard 3440 Embargoes and Requests.

4.8 Crimes against the Tax Authority and Social Security (Tax fraud / Social Security fraud / Breach of accounting obligations or misrepresentation / Subsidy fraud / European Union general budget fraud)

The Parties Concerned shall avoid using any opaque structures intended for tax evasion, these being understood as structures which, through the involvement of natural persons or special purpose entities, whether or not they are located in tax havens or in regions which are uncooperative with tax authorities, have been designed with the purpose of concealing knowledge from the authorities about those ultimately responsible for the activities or about the ultimate beneficial owners of the funds.

It shall be prohibited to falsify, conceal or simulate data, accounting entries and/or transactions, make double-entry bookkeeping, double invoicing, etc. with the intention of circumventing payments, or obtaining illicit profits, to the detriment of the National Tax Authority or Social Security.

It shall be prohibited to design, create, advertise or sell any financial product which may entail any unlawful circumvention of payments, or the receipt of any undue profits, to the detriment of the National Tax Authority, whether on behalf of the Institution or on behalf of customers or third parties.

The Institution's financial information shall be prepared reliably and carefully, ensuring that:

- i. All transactions, facts and events referred to in the financial information exist in reality and that they have been recorded at the appropriate time.
- ii. The information reflects all transactions, facts and events in which the Institution is involved.
- iii. The transactions, facts and all other events are recorded and assessed in line with applicable regulations.
- iv. The financial information reflects the rights and obligations in effect at that time through the corresponding assets and liabilities, pursuant to applicable regulations.

All Parties Concerned with accounting responsibilities shall be required to ensure that all accounting information has been adequately prepared, and that it gives a true and faithful image of the Institution's equity and financial situation. All Parties Concerned with accounting responsibilities shall be required to keep and retain all of the documentation used in the course of their professional activities.

4.9 Frustration of execution

The Parties Concerned shall act with honesty when managing their obligations undertaken with third parties and shall ensure that all decisions are made in good faith. They shall also be mindful of any potentially wilful misconduct by third parties intending to use the Institution instrumentally to carry out any activity that delays, hampers or impedes, for example, the effectiveness of an embargo and, in general, that frustrates a third party's legitimate expectations of collection.

4.10 Criminal bankruptcy

The Parties Concerned shall exercise due diligence when dealing with economic and financial matters, adhering to relevant regulations and ensuring that all financial information provided to or by the Institution gives a faithful and accurate image of its assets and economic standing. They shall also refrain from contributing to any illegitimate reduction of the collection capabilities guarantees of third parties.

4.11 Computer-related damage / Computer hacking

Pursuant to the Information Systems Security Policy and the rules of procedure relating to the Institution's computer and technological resources, the Parties Concerned shall adhere to the specific rules governing the use of email and internet access and shall not make any inadequate use of the foregoing.

The Parties Concerned shall not use the email system to instigate or collaborate with the installation of applications of unknown origin.

Any creation, membership, participation or collaboration by the Parties Concerned in social media, forums or online blogs, as well as any opinions or statements expressed therein, shall be carried out in a manner that clearly shows the personal nature of the foregoing, and no references shall be made to the Institution or to the user's connection therewith. Any Parties Concerned whose specific role within the organisation is to provide an institutional response to third-party activity in such forums shall be exempt from this prohibition. In all cases, the parties Concerned shall refrain from using the image, name or brands of the Group to open accounts or register themselves with such forums and media.

The Parties Concerned shall not use any of the computer resources made available to them for any unlawful purposes or for any other purposes which could damage the image or interests of the Institution, its customers or third parties, affect the service and dedication of the employee, or disrupt the operation of its computer resources.

The Parties Concerned are expressly prohibited to access third-party applications or computers without prior authorisation, and shall refrain from deleting, damaging, deteriorating, altering, removing or blocking access to data, programmes or electronic documents, and shall not obstruct the operation of any computer system.

Any incident related to any of the foregoing, regardless of whether the cause is internal or external, shall be reported to the head of the Information Systems Security Division.

4.12 Crimes against intellectual and industrial property

The Parties Concerned shall respect intellectual property and the rights of use to which the Institution is entitled in relation to courses, projects, computer programmes and systems, equipment, manuals, videos, knowledge, processes, technology, 'know-how' and, in general, any other works and activities carried out or created within the Institution, whether in consequence of their own professional activity or that of third parties. Therefore, intellectual property shall only be used for the sole and exclusive purpose of carrying out their professional activities, and any and all materials in which such property is provided shall be returned upon request and/or when required.

The Parties Concerned shall only be authorised to use the training materials provided for the performance of their professional activities.

The Parties Concerned shall not share nor assign to third parties any licences or passwords which could provide access to materials which are intellectual or industrial property or over which intellectual or industrial property rights may exist.

The Parties Concerned shall be prohibited from using any form of material (images, texts, drawings, etc.) without prior knowledge or evidence that the Institution has acquired the corresponding rights and/or licences.

The Parties Concerned shall not install or use on the computer resources made available to them any programmes or applications whose usage is illegal or which could disrupt the systems or damage the image or interests of the Institution, its customers or third parties.

4.13 Crimes related to counterfeit credit cards, debit cards and traveller's cheques

When exercising their duties and responsibilities, the Parties Concerned shall take the necessary precautions to prevent the copying, alteration and/or falsification of payment methods, and the security rules and procedures established in this regard by the Institution must be followed. In particular, they shall be mindful of any suspicious behaviour by both their subordinates and others around them.

4.14 Currency counterfeiting

During the course of their activities, the Parties Concerned shall exercise the utmost care and diligence to prevent any form of practice which could lead to a false currency being put into circulation. Internal cash regulations must be complied with at all times, in particular the regulations relating to the internal handling of cash in branches and recyclers, in order to minimise any potential risk arising from the ordinary management of cash in the Bank's branch network.

4.15 Crimes against urban and land planning

It shall be prohibited for the Parties Concerned to carry out any construction, demolition, remodelling, restoration, etc. without having first obtained the corresponding licences and authorisations.

Any agents, intermediaries or advisers used for transactions or contracts in any way involving Public Administrations must, wherever possible, be agents, intermediaries or advisers of recognised standing within the relevant market or sector, particularly when the remuneration of such agents, intermediaries or advisers is linked to the success of the transaction or contract.

4.16 Crimes against natural resources and the environment

The Parties Concerned shall ensure that none of their actions could pose a threat to or damage the environment.

Any supplier or firm subcontracted by the Institution must be informed that they shall be required to adhere to the values and principles relating to environmental protection set forth in the Group's Environmental Protection Policy, which is published on the corporate website.

4.17 Crimes against workers' rights

The Parties Concerned shall not engage in any conduct or perform any action, nor give rise to or collaborate with any conduct or action which could, individually or collectively, endanger their own integrity and/or that of any other of the Parties Concerned.

The Parties Concerned shall be required to notify their superiors of the existence of any dangerous situation that comes to their knowledge during the course of their professional activities, as well as any ineffectiveness or inadequacy of protection systems for individual or collective use which have been made available to them.

The Parties Concerned shall abide by and adhere to the procedures set forth in the Group's Occupational Hazard Prevention Plan.

4.18 Obstruction of inspections and supervisory activities

The Parties Concerned are under the obligation to cooperate with public administrations and/or supervisory bodies during the latter's inspection activities, always in accordance with the existing internal protocols on this matter, and any conduct which may obstruct or hinder such activity shall be prohibited.

4.19 Rigging of prices in public tenders and auctions

The Parties Concerned shall refrain from engaging in any conduct intended to alter, through fraudulent machinations or contrivances, the price of items included in an auction or tender. Criminal conduct shall include, but not be limited to, the request of a promise or bribery in order not to take part in a public tender or auction, attempts to remove bidders from, or prevent their participation in, a public auction or tender through the use of threats, bribery, promises or any other means, entering into an agreement with other bidders to alter the final price of the auction or tender (collusion) and the failure to pay or otherwise render the sale without effect, as well as the fraudulent withdrawal from the auction after being awarded the item in question.

4.20 Crimes against public health

Although the performance of these illegal activities may be seen as far removed from the Institution's activities, particular care must be exercised to maintain a reasonable level of vigilance when using any of the firm's resources which could be conducive to the commission of these types of crimes (maintenance of buildings or facilities such as the air conditioning unit, for example). It is important to monitor the use of computer resources that are accessible to third parties (social media, forums, chats, etc.) as these are ideal means through which commit such crimes.

The Parties Concerned shall prevent and remain vigilant of any form of behaviour which could entail the financing of drug trafficking. Any persons within the Institution engaging in the assessment of financing or lending transactions, as

well as all branch staff responsible for KYC procedures prior to entering into business relationships, shall be particularly diligent.

For the supply and sale of food at work centres, the Institution must enter into relationships with suppliers that meet the highest quality standards, and do not engage in any conduct such as offering food products that omit or alter the legal requirements on expiry date or composition or that in any way compromise people's health.

4.21 Crimes related to risks from explosives and other agents of harm

The Parties Concerned shall prevent and mitigate risks and remain vigilant of any use of substances which could be explosive, flammable, corrosive, toxic or asphyxiating. Any persons within the Institution responsible for undertakings related to compliance with regulations on occupational hazard prevention and environmental management shall be particularly diligent.

4.22 Hate crimes and extolling terrorism

The Parties Concerned shall perform the activities associated with their position and duties, applying objective criteria and adhering to the Institution's internal regulations at all times. Under no circumstances shall they engage in any actions or activities which could discriminate against, or negatively affect the dignity of, any other employee, customer or third party through humiliation, contempt, or discrediting for reasons of ethnicity, race or nationality, country of origin, sex, sexual orientation, gender, illness or disability.

Furthermore, the Parties Concerned shall refrain from making any statements or engaging in any actions which could suggest or entail their practice of any of the above conduct, ensuring that their relationships with fellow employees and the Institution's current and potential customers are always aligned with the principles and values set forth in the Group's Code of Conduct. These matters should not only be taken into account when performing day-to-day activities and during working hours; particular care shall also be exercised when using social media, for example, by refraining from making any statement or comment on

social media which could contravene or conflict with any of the aforementioned principles. The foregoing shall also apply to advertising and marketing activities.

4.23 Crimes against international citizens' rights

The Parties Concerned shall not promote or support the illegal immigration of workers to Spain, nor the recruitment of foreign workers who do not hold a valid work permit.

Although the performance of these illegal activities may be seen as far removed from our activities, particular care must be taken to avoid entering into any business relationships with entrepreneurs acting on an unincorporated or incorporated basis who may be involved with or have the ability to carry out such practices. It is therefore particularly important to be careful and responsible in the selection and recruitment of people who will be linked to the Institution.

Those persons engaging in duties related to the recruitment of foreign staff shall exercise a particularly high level of diligence and care.

4.24 Crimes related to illegal organ trafficking

Even when firms do not engage in any directly related activities, they may find themselves at risk of becoming involved with these types of crimes, for example, by publicising the activity, transportation or illegal storage of human organs.

The Parties Concerned shall remain vigilant of any suspicious behaviour which could entail or be indicative of collaboration in the financing of these illegal activities.

4.25 Embezzlement

Embezzlement is when an authority or public official with the power to manage public assets makes unlawful use of such power, giving rise to losses in relation to the assets managed, or appropriates, for themselves or for a third party, money, bills of exchange, securities or any other personal property received for the purpose of their deposit, use for specific purposes or for safe-keeping, or

which have been entrusted to them through any other means that generates the obligation to deliver or return them, or when such authority or public official denies having received the foregoing. Any authority or public official who intentionally provides third parties with false information regarding the economic circumstances of the public institution by which they are employed, in order to occasion economic losses or damages for the latter, shall also be considered to have committed this crime. The actions referred to above also relate to any persons who have been entrusted any kind of responsibility for funds, income or property of Public Administrations and also to any managers or depositors of money or seized or attached goods or goods deposited by the public authority, even if they are owned by individuals.

The Parties Concerned shall be vigilant at all times and shall not act or behave in any way that could put them at risk of committing or becoming involved with activities matching the definition of these types of crimes.

4.26 Terrorist crimes

Terrorist crimes (which are separate from the crime of the financing of terrorism) refer to the commission of any serious crime against the life or physical integrity, freedom, moral integrity, sexual indemnity, crimes against assets, natural resources or the environment, public health, catastrophic risk, fire, forgery of documents, crimes against the Crown, terrorist attacks and the ownership, traffic and hoarding of weapons, ammunition or explosives or the seizure of aircraft, vessels or other means of public or goods transportation, for the purpose of subverting constitutional order, seriously altering public peace, or causing a state of terror in all or part of the population. Acts of collaboration are the assignment or use of lodging or deposits, the concealment, hosting or transfer of people or the provision of technology services, as well as any other equivalent means of cooperation or assistance. Equally, extolling the conduct indicated above or any actions that discredit, belittle or humiliate victims of terrorist crimes or their family members, as well as the public dissemination of messages that incite the commission of the referred actions, shall also be considered to constitute a crime.

The Parties Concerned shall be vigilant at all times and shall not act or behave in any way that could put them at risk of committing or becoming involved with activities matching the definition of these types of crimes.

4.27 Criminal mismanagement

As part of the Institution's desire to eliminate any criminal conduct that may occur in its environment, whether or not it gives rise to criminal liability for it, certain crimes have been identified, such as criminal mismanagement, the commission of which may have a high economic and reputational impact. In this case, the Institution's assets must be protected with due diligence and individuals should always conduct themselves within the limits of the powers established in the powers of attorney.

4.28 Misappropriation

As in the case above, this is a crime that has an economic impact on the Institution. Misappropriation entails taking ownership, for oneself or for a third party of money, personal effects, securities or any other movable property received for the purpose of their deposit, use for specific purposes or for safe-keeping, whether they belong to the Institution or to any third party that has entrusted to the Institution their safe-keeping or administration.

4.29 Crimes against moral integrity

The Bank categorically condemns any act involving the infliction of degrading treatment on a person or that, by taking advantage of a relationship of superiority, inflicts repeated hostile or humiliating acts resulting in serious harassment against the victim. Furthermore, the performance of hostile or humiliating acts aimed at preventing the legitimate enjoyment of a dwelling by its occupier constitutes criminal conduct, with a high reputational impact.

4.30 Falsification of documents

As part of its commitment to ethics and conduct, the Bank prohibits any kind of alteration, manipulation or falsification of public or private documents.