



# Human Rights Policy

Dec 2024

## **Introduction**

We believe that human rights are universal standards that provide an important moral base for executing on our business goals. Our corporate culture is characterized by mutual respect, exceptional commitment, and a strong customer focus. Respecting people's dignity and their inherent rights constitutes an essential requirement of action – the UN Guiding Principles for Business and Human Rights also outline the corporate responsibility to respect human rights which we connect to our commitment to promote and preserve the well-being of the different social areas in which we operate. BAWAG Group also firmly rejects all forms of human trafficking, forced, child and compulsory labor. We expect the same from our suppliers and other business partners. Human trafficking, forced, child and compulsory labor are contrary to our ethical standards and corporate values. Our Code of Conduct sets forth the key understanding of banking and conduct ethics that we apply.

This commitment applies to all of the relationships that we establish with our customers, suppliers, employees and other stakeholders, that are directly related to our business activities, our products or our services.

As BAWAG, we make a substantial contribution to human rights as lender, employer, service provider and driver of progress and prosperity. Our impact is focused on different levels, i.e. our employees, customers, suppliers but also the society at large.

For more details, please see our [Code of Conduct](#) which has been published on our website.

## **Our approach**

Our Human Rights Policy has been approved by the Management Board of BAWAG Group in accordance with our internal guidelines and will be reviewed at least annually. It describes the guidelines and principles of the BAWAG Group related to human rights. This document contains our commitment to define our framework for our relationship with different stakeholders.

## **Human rights and our employees**

Our employees are the foundation for delivering on our strategy and building BAWAG Group of tomorrow. Our common values and objectives shape our actions and our decisions and unite us as a team. Teamwork and mutual respect are of paramount importance to us.

We are striving to be a meritocracy: At BAWAG Group, people from over 50 nations, from all age groups, with different sexual orientations, with limitations and different faiths, work together every day. Diversity and equal opportunity for all employees are key success factors for our Group and are the responsibility of the management, implemented operationally by Human Resources, with a direct reporting line of the head of Human Resources to the CEO, and put into practice by all managers and employees of the company. All BAWAG Group employees, whether full-time or part-time, are to be treated equally and fairly. BAWAG Group does not tolerate any discrimination based on age, gender, gender identity, disability, ethnicity, skin color, language, impairment, or sexual orientation, origin or religion. BAWAG Group also firmly rejects any form of bullying, sexual harassment, threats and violence.

BAWAG Group ensures that risk assessments, preventive measures and redress for human rights violations affecting employees are anchored in operational processes.

In our actions and conduct we consider human rights, including the OECD Guidelines and the UN Guiding Principles on Business and Human Rights. In addition, our corporate values are based on the workers' rights of the International Labor Organization (ILO). We have implemented adequate internal policies and procedures designed to ensure the respect of human rights, aligned with the foundation of ethics contained in the Code of Conduct. These commitments, amongst others, are focused on:

- prohibiting of child and forced labor;
- complying with the labor law framework valid in each one of the jurisdictions where we operate;
- promoting diversity and equal opportunities;
- prohibition of discrimination in employment and occupation;
- ensuring a working environment which is free of risks against health and safety in all of our facilities; and
- guaranteeing the freedom to form a union, association, and the right to collective bargaining.

For additional details, please see our statement on [Diversity and Inclusion](#) which has been published on our website.

### **Human rights and our customers**

Environmental, social and governance risks (ESG risks) are an important factor when deciding whether to engage with clients and potential customers. Therefore, our financing choices have an impact on helping society transition to becoming more sustainable. In order to identify, prevent or mitigate adverse impacts on human rights, BAWAG Group assesses whether its customers' business activities are linked to human trafficking and the exploitation of human beings when granting loans. The Bank does not participate in transactions where there are clear indications of significant negative impacts on human rights and where internal processes show that these impacts cannot be avoided or adequately mitigated.

Besides mitigating risks related to human rights, we also pursue opportunities to advance them: Since the beginning of 2020, it has been mandatory to include ESG criteria in our product introduction process. The impacts are queried and presented using a statement on sustainability aspects (CSR/ESG statement), which is integrated into the document template for product launches: Positive social aspects include the opportunity for people with special needs to participate, the reduction of discrimination, the fight against poverty, and the expansion of educational opportunities.

For more details, please see our [Green Finance Framework](#) which has been published on our website. Furthermore, BAWAG Group has published [Lending Criteria](#), consisting of industry exclusions and restrictions in lending, which are accessible via website. consisting of industry exclusions and restrictions in lending, which are accessible via website.

### **Human rights and our suppliers**

Human rights risks can also arise outside of our direct business activities, which we control or influence directly, for example in the context of supply chains. Our Supplier Code of Conduct covers human rights aspects such as equal treatment, child labor, forced labor etc.

For details, please see our [Supplier Code of Conduct](#) which has been published on our website.

### **Human rights and society**

The United Nations play a key role in encouraging sustainable progress. As a signatory to the UN Global Compact, we are committed to comply with the ten principles focusing on labor rights, human rights,

environmental protection and anti-corruption and, since signing the UN Global Compact Women's Empowerment Principles (WEP) in 2015, to complying with the seven WEP. BAWAG is committed to complying with all of the applicable laws and respecting the internationally recognized human rights, including the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

We are strongly committed to the sustainable development of the societies in which we are present. This commitment unfolds in several areas of action, including the respect, defense and promotion of human rights. BAWAG Group is committed to:

- actively collaborating with governmental bodies, international organizations and other stakeholders to promote respecting human rights;
- fight against corruption in its different forms, periodically revising its anti-corruption framework and strengthening our framework when necessary; and
- being transparent in paying taxes, while applying the principles of integrity and prudence.

For further details on these areas, please see our [Tax Strategy](#), [Anti Corruption Policy](#) and [Lending Criteria](#) which have been published on our website.

As a global company, BAWAG Group operates in countries with different historical and cultural developments with regard to human rights. BAWAG Group complies with all applicable laws and regulations of the countries in which it operates. In cases where national laws have less stringent requirements for the protection of human rights than international standards, we take an approach that ensures that internationally recognized human rights are upheld.

Furthermore, we see education as one of the most important cornerstones to keep the partnership of our industry with society at eye level. By promoting plans and actions that lead to improving economic and social rights, equal opportunities, diversity, non-discrimination and inclusion, we strive to help people to increase their knowledge and well-being. With a higher level of (financial) education and accessibility of education opportunities, we play an active role in creating partnerships and developing projects. Education should never be a question of the origin or education level of one's parents. As a bank, it is important to us to support outstanding projects in the field of education.

### **Complaints management**

BAWAG Group encourages all of its stakeholders to contact it directly if there are indications of human rights violations by the Bank in its own activities or in connection with its business relationships. Anyone can contact BAWAG Group to make a complaint or to raise specific concerns.

Findings from human rights-related complaints are incorporated into the complaint management analyses and presented to a Committee of Management Board in order to drive forward targeted improvements to processes and products in line with our human rights obligations. The complaints procedures are described in the relevant policies.