



# Human Rights Policy

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## 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. 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 with which business and activities are carried out.

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 of action in 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 47 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, disability, sexual orientation, origin or religion. BAWAG Group also firmly rejects any form of bullying, sexual harassment, threats and violence.

In our actions and conduct we consider human rights, including the OECD Guidelines and the UN Guiding Principles on Business and Human Rights. 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;
- 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.

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.

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

Our Supplier Code of Conduct, which is mandatory for suppliers to sign prior to entering into a business relationship with our Group, covers human rights aspects such as equal treatment, child labor, forced labor etc., including, amongst other things:

- to promote equality of chances and equal treatment of the suppliers' employees, without attention of the skin color, race, nationality, social background, handicap (if any), sexual orientation, political or religious conviction and gender or age;

- to respect the dignity, private sphere and personal rights of every individual;
- not to tolerate child employment; and
- to take over the responsibility for health and security of employees.

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

### **Human rights and society**

The United Nations plays 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.

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.

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.