



Human Rights Protection Policy

in Bank Ochrony Środowiska S.A.

This Policy on the Protection of Human Rights at Bank Ochrony Środowiska S.A. is introduced guided by respect and protection of fundamental human rights and particular care for the long-term welfare of Bank Ochrony Środowiska S.A., undertaking that as part of its operations, Bank Ochrony Środowiska S.A. will respect and promote the observance of human rights in relation to employees, customers, business partners and the local community.

Chapter 1

General provisions

§ 1

1. Bank Ochrony Środowiska S.A. is committed to respecting and protecting fundamental human rights and undertakes to respect them in accordance with the principles set out in the United Nations Universal Declaration of Human Rights and other internationally recognised norms and standards.
2. The purpose of the Policy for the Protection of Human Rights at BOŚ S.A. is:
 - 1) implementation of due care for human rights as an integral part of the Bank's business and operational activities at all levels and positions;
 - 2) avoiding causing or contributing to a negative impact on human rights by the activities of the Bank, its products or services;

- 3) counteracting the negative effects of direct or indirect impact of the Bank's activities on the proper implementation of human rights;
 - 4) compliance with all applicable legal requirements and guidelines of international norms and standards in the field of human rights protection;
 - 5) raising awareness of human rights among employees, customers, business partners and the local community.
3. The policy covers all persons employed at the Bank, regardless of the basis of this employment (employment relationship, civil law or other relationship) and its clients, partners and other stakeholders.

Chapter 2

Policy principles

§ 2

In Bank Ochrony Środowiska S.A. human rights are respected by applying the following principles:

- 1) non-discrimination - BOŚ is against all forms of discrimination, direct and indirect, due to: gender, age, disability, health condition, race, nationality, ethnic origin, religion, denomination, non-belief, political beliefs, trade union membership, sexual orientation, gender identity, family status, lifestyle, form, scope and basis of employment, other types of cooperation and other circumstances that expose them to discriminatory behaviour;

- 2) freedom of association - BOŚ recognises the right of employees to freely associate in trade unions and collective bargaining;
- 3) opposition to forced labour - BOŚ is against all forms of employee exploitation, including child labour, forced or compulsory labour and other forms of coercion, both psychological and physical, applied to both employees of the Bank and employees in the supply chain, as well as strongly condemns all forms of human trafficking and exploitation;
- 4) appropriate working and pay conditions - BOŚ builds a friendly working environment based on the mission and values contained in the Bank's Strategy, cares for the balance between work and private life of its employees, ensures fair remuneration and fair working conditions. Detailed provisions on the working conditions and remuneration are contained in the Work Regulations, Remuneration Regulations and the regulations of variable remuneration components systems;
- 5) occupational health and safety - the occupational health and safety of employees is an important value for BOŚ, therefore it actively works to maintain a safe and healthy work environment. The Bank applies the standards of prevention, assessment and management of risk related to the conducted activity. A corporate culture focused on health and safety at work is promoted and disseminated;
- 6) integrity - BOŚ rejects all forms of corruption, considering that it also constitutes a violation of human rights. The bank has implemented, among others The Code of Ethics and the Methodology of Counteracting Money Laundering and Terrorist Financing, constituting a corporate reference point in the field of preventing corrupt practices and specifying a list of principles and rules aimed at preventing or reducing the risk of corruption;
- 7) respect for privacy - the Bank is aware of the importance of ensuring appropriate security standards for the processed personal data. We respect the right to privacy of all employees and stakeholders and are committed to using the processed data and information in an appropriate manner;
- 8) Whistleblowing implementation - the Bank has implemented a procedure for anonymous reporting of violations of the law and the Bank's procedures and ethical standards. It also provides its employees with a special communication channel for reporting, also anonymously, any situation that violates ethical standards;
- 9) respect for diversity - the Bank has implemented a Diversity Policy aimed at, among others, creating a friendly working environment where each employee feels respected and valued, and can fulfil their individual potential.

Chapter 3 Policy implementation

§ 3

1. As part of its operations, the Bank identifies, assesses, prevents and reduces the risk of human rights violations by applying appropriate actions as soon as such events occur. In particular:
 - 1) by means of information, training and implemented internal regulations, raising employees' awareness of human rights;
 - 2) introducing a procedure for anonymous reporting of violations of law and procedures and ethical standards applicable at the Bank, regulating the principles and procedure for reporting and handling reports on actual or potential violations of regulations, procedures and ethical standards, including regulations on anti-money laundering and terrorist financing and regulations governing the performance of activities referred to in Article 70(2) of the Act on trading in financial instruments;
 - 3) by appointing a team to conduct explanatory proceedings in cases of violation of the law and the procedures and ethical standards in force at the Bank, which is responsible for the analysis, assessment and follow-up activities related to the anonymous reporting of violations of law and the procedures and ethical standards in force at the Bank,
 - 4) by managing the supply chain in a responsible manner, which means, in particular, respecting human rights when selecting suppliers;

- 5) by requiring the suppliers to implement a similar management system within their supply chains. The Bank reserves the right to limit, suspend or terminate cooperation with a given supplier if there is convincing evidence in each case of any violation of human rights.
2. This Policy is subject to an annual review by the HR Department in cooperation with the organisational unit responsible for compliance with the regulations, which analyses the respect for the protection of human rights at the Bank, including the implementation of the principles referred to in Chapter 2. The results of the review together with recommendations for appropriate actions are presented to the Bank's Management Board.

Chapter 4 Final provisions

§ 4

1. The Policy shall apply without prejudice to mandatory provisions of law.
2. In matters not regulated in the Policy, the generally applicable provisions of law and internal regulations in force at the Bank shall apply.
3. Every year, the Bank informs about actions taken to promote the protection of human rights by publishing relevant information on its website.