

## **Eurobank Statement on Human Rights**

### **1. Overview and scope**

In Eurobank Services and Holdings S.A. (hereinafter referred to as “Eurobank” or “Bank”) we are committed to respecting and protecting human rights. In line with international leading practice, we have established pertinent policies and procedures, such as our Code of Conduct and Ethics, that reflect this commitment. We encourage our people to treat each other with dignity and respect, and we do not tolerate discrimination, bullying, harassment or victimization on any grounds.

Eurobank fosters an inclusive work environment in which every person is treated fairly and respectfully, while all forms of discrimination are being rejected. We are committed to respecting and promoting human rights and to avoid unintentionally causing or contributing to adverse human rights impacts that may affect our employees, suppliers, contractors, clients and other parties directly linked to our operations, products or services.

To that end, we have issued pertinent processes aiming to identify, prevent and mitigate impacts on human rights, as well as processes that enables the remediation of any adverse human rights impacts caused

### **2. References & Commitments**

Eurobank acknowledges the UN Guiding Principles on Business & Human Rights and, in particular, the corporate responsibility to respect human rights (pillar 2). Eurobank shall avoid causing or contributing to adverse human rights impacts through its own activities and address such impacts if and when they occur. Furthermore, Eurobank shall seek to prevent or mitigate adverse human rights impacts that are directly linked to its operations, products or services by its business relationships, even if Eurobank has not contributed to those impacts.

Eurobank is a signatory to the UN Global Compact since 2008, and is committed to respecting, actively supporting and promoting the 10 fundamental principles relating to human rights, labour rights, protection of the environment and anti-corruption. In line with this commitment, Eurobank reports on issues relating to Human Rights as part of the annual Communication on Progress, embedded into the Annual Business and Sustainability report. Eurobank is an active member of the Global Compact Network Hellas, contributing to the local promotion of the 10 fundamental principles.

Moreover, Eurobank is a founding signatory of the United Nations Environment Programme Finance Initiative (UNEP FI) Principles for Responsible Banking, designed to bring purpose, vision and ambition to sustainable finance. In line with this commitment and the PRB implementation roadmap, Eurobank publicly discloses self-assessment reports.

Eurobank is a signatory of the Banking Collective Bargaining agreements that define the framework of labour rights and working relations for the employees of the Banking Sector in Greece.

Finally, Eurobank is an active participant in various Associations and Organizations that promote Sustainable Growth and Responsible Entrepreneurship. These include the Sustainable Development Committee of the Hellenic Bank Association (HBA), where Eurobank is a founding member.

### **3. Employees**

One of the most important priorities for Eurobank is to ensure that all our employees are treated with respect and dignity. The human rights topic in this context is wide-ranging and includes, but is not limited to, the exclusion of forced and child labour, fair and equitable compensation and working hours, freedom of association, data privacy and respect of freedom to act.

In line with the UN Guiding Principles on Business & Human Rights, our approach is based on the International Bill of Human Rights and the ILO Declaration on

Fundamental Principles and Rights at Work as well as applicable labour laws. Within this framework, Eurobank is committed to the following standards:

### **3.1 Wellbeing and Health & Safety**

We are committed to creating and maintaining a safe and healthy work environment that promotes balance and wellbeing. Our commitment to employee wellbeing is demonstrated through a set of Bank wide benefits and policies that support our employees and their families in major life cycle stages (medical coverage, housing, pension, mental health, time off, etc.). The Bank has also adopted work-from-home as a flexible work arrangement for the majority of its departments.

Eurobank is dedicated to maintain high standards of prevention in the workplace in order to constantly ensure health and safety at work under business as usual or public health crisis situations alike. The Group has a certified Health and Safety management system in place in accordance with ISO 45001, while it follows all measures required under national and EU legislation to ensure the health and safety of all employees, customers and contractors.

### **3.2 Diversity and Inclusion**

In order to promote an inclusive workplace, everyone in Eurobank is responsible for safeguarding and supporting diversity, rejecting all forms of discrimination and harassment while promoting an inclusive workplace where employees feel they can bring their authentic selves to work. We apply the rule of zero tolerance in cases of exclusionary conduct, treating them as a violation of the Bank's core principles and values. All forms of discrimination, harassment or intimidation relating to ethnicity, gender, motherhood, color, religion, health, sexual preference and any other distinction are behaviors incompatible with our culture and values. To protect our work environment from such incidents, we have established communication channels and processes through which any incident or suspected incident of discrimination, harassment or intimidation can be reported, examined and addressed. Eurobank provides protection against reprisals and keeps confidential the identity of those who have submitted information they know and consider to be accurate and true. Malicious reports are not subject to protection and confidentiality and are considered to be unethical.

### **3.3 Violence and Harassment**

Respect for human dignity, at all levels, is a key element of our culture. We apply a zero-tolerance approach for any forms of violence, harassment and sexual harassment in the workplace and such violations are strictly prohibited for all of the Bank's associates. We encourage any person who considers that he or she has been subjected to violence and / or harassment, as well as any person who becomes aware of incidents of violence and / or harassment in violation, to promptly and without delay report the incident by using one of our communication channels.

Eurobank treats all incidents seriously, with respect and confidentiality while promptly investigates all allegations. Eurobank shall enforce disciplinary action to those committing acts of harassment of sexual or other form, as mentioned in this Statement.

### **3.4 Freedom of association and collective bargaining**

We fully support the freedom of association and the effective recognition of the right to collective bargaining. This is signed in our Internal Labor Regulation, which is publicly available in the official mediation & arbitration body.

More specifically, articles 7.8 & 7.9 of the Internal Labor Regulation ensure that the Bank respects & ensures the freedom of political & philosophical beliefs, within the framework defined by the constitution and current legislation. Employees' progress and development is neither positively, nor negatively affected by their political and/or philosophical beliefs. The right of freedom of association of the employees is their constitutional right, within the framework of the current legislation.

We maintain a constructive dialogue with all our employee representatives and trade unions and interact in co-operation and in a spirit of trust.

### **3.5 Forced labour, child labour and human trafficking**

We prohibit all forms of forced labour, child labour or human trafficking in our own business practices and in collaborations within our business value chain.

### **3.6 Adequate Compensation**

Eurobank has established a competitive remuneration framework in order to attract, engage and retain its employees and offers fair and equitable remuneration, based on contracts which are in agreement with the corresponding national labour market and ensure compliance with the respective national regulations on minimum pay, working hours and the granting of leave.

We are committed to paying our people fairly and equitably relative to their role, skills, experience and performance in a way that balances the needs of all our stakeholders. That means our remuneration policies reward sustainable performance that is in line with our purpose and values, as well as our risk expectations.

## **4. Customers**

We cultivate a strong relationship of trust that respects human rights in all our activities with customers. Eurobank treats all customers with dignity, fairness and equality. We encourage them to submit their complaints and we respond promptly and transparently via modern, certified procedures which offer fair solutions and improve customers' experience. Key elements of maintaining responsible customer relationships include responsible provision of information and customer service, personal data protection and complaints management. As part of its responsible customer information strategy, Eurobank focuses on providing customized information to every customer/counterparty, with a view to communicating its products and services in a transparent manner. To this end, it has set up customer support departments, as well as both traditional and online service networks. It has also established simple and easy-to-understand procedures and has created brochures to inform customers accurately and clearly about all its products and services. The Bank applies the regulatory framework and the Banking Code of Conduct and has control mechanisms in place to ensure compliance with the legislative framework. The Bank has been increasingly incorporating ESG / sustainability in its offerings and client engagement and has been collaborating with clients and various stakeholders with the purpose of promoting sustainability principles in business.

## 5. Suppliers

We address the need to respect human rights when working with suppliers and external providers / contractors. We seek to engage with suppliers and external providers / contractors whose values and business principles are consistent with our own and who respect human rights, labour rights, employment laws and environmental regulations. Eurobank's Procurement Policy makes provision for enhanced procedures ensuring supplier compliance with the applicable local, national and international environmental, social, legislative and regulatory requirements, as a prerequisite for the establishment or continuation of business relations with suppliers.

In this respect, when we are advised or otherwise take knowledge of human rights violation or other related unlawful acts within our value chain (including but not constrained to forced labour, child labour and human trafficking), we immediately take corrective action in coordination with the appropriate authorities.

## 6. Personal Data Privacy

As part of our efforts to fulfill our commitment to respect human rights, Eurobank ensures that individuals (e.g. employees, customers) can exercise their rights regarding their personal data, including the rights of access, rectification, erasure, restriction, data portability, objection and those related to automated decision-making.

Eurobank takes appropriate measures to provide information (through its privacy notices) to individuals relating to the processing of their personal data in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

Eurobank also receives individuals' consent, when their personal data processing cannot be based on other legal basis. Eurobank ensures that the consent is freely given, specific, informed and unambiguous and is acquired whenever is needed.

Eurobank implements appropriate technical and organizational measures, which are designed to implement data-protection principles, in an effective manner and to integrate the necessary safeguards into the processing in order to meet the requirements of the GDPR and any other applicable privacy legislation and protect the rights of individuals.

## 7. Grievance Mechanisms undertaken to meet commitment

We encourage all our stakeholders to bring to our attention instances where our business services have potential or real human rights impacts.

Our employees are expected to uphold these standards and help us to foster an ethical, safe, secure, respectful and inclusive work environment. All forms of discrimination, harassment or intimidation are behaviors incompatible with our culture and values. We show zero tolerance to such behaviors, and we have established communication channels and processes through which any incident or suspected incident of discrimination, harassment or intimidation can be reported, examined and addressed. All Staff members are encouraged to raise issues of concern and speak up when they suspect potential wrongdoing or are faced with conduct or situations that may raise ethical, legal or regulatory concerns.

Eurobank encourages customers to contact the Bank regarding any grievances, including those concerning human rights. Customers can contact us or submit complaints through all available channels of the Bank. This includes branches, the Bank's web-site, telephone, email, and letters or in person at the Complaint Management Division offices.

In order to facilitate the submission of grievances related to human rights violations, Eurobank applies the Policy of Reporting Unethical Conduct, as following:

Eurobank facilitates the members of staff of Eurobank and concerned third parties to submit Reports on any actual, attempted or suspected unethical conduct, while eliminating any concerns that their Report may result in adverse consequences for themselves. Reporting occurs when a member of staff or a concerned third-party reports suspicions of misconduct having an adverse impact on staff members, third parties or Eurobank. The implementation of this Policy has significantly contributed to the creation

of an environment of trust and protection for its staff, encouraging staff members to fulfil their duty to report all unethical conduct.

The Bank informs all Units as well as the Executive Board about the results and data that derive from handling the complaints, in order to evaluate the issues that arise.

## **8. Governance and monitoring**

The Statement is approved by the Executive Board of the Bank. We review this Statement of Human Rights every year to reflect our ongoing learning and emerging best practices among our employees, customers and suppliers.

Nothing in this statement may be interpreted as implying for any group or individual any right to engage in any activity or to perform any act aimed at the destruction of any of the rights and freedoms set forth herein.