

# Human Rights Policy

## Introduction

Respect for human rights is inscribed in the basic objectives and obligations of the Bank Millennium S.A. Group (hereinafter: "Bank Millennium Group"), which assumes the realisation of business activity based on social responsibility, in particular through the implementation of the United Nations Sustainable Development Goals. As the Bank Millennium Group, we are committed to respecting human rights, ensuring compliance with the provisions of Polish and international law (including the United Nations Universal Declaration of Human Rights) and 10 Principles of Global Compact, as well as defining internal practices and procedures in this area.

## Areas of commitment and action

We have adopted the following principles related to respecting and promoting human rights:

- **Prohibition of forced labour, child labour and human trafficking** - we reject all forms of forced labour related to human trafficking, forced labour and child labour or any modern form of slave labor, while complying with the provisions of Polish and international law.
- **Prohibition of discrimination and violation of workers' rights** - we promote a culture of tolerance and reject all forms of discrimination based on origin, gender, sexual orientation, family situation, nationality, ethnicity, religion, membership of social groups and political beliefs or any kind of individual physical characteristics, health conditions or disability. We provide a healthy and safe working environment, free from discrimination, mobbing and harassment and all forms of violence.
- **Freedom of association** - we respect the freedom of association and observe the principles enabling the association of employees, as well as create conditions for action for organisations associating employees, including trade unions, in accordance with applicable law.
- **Remuneration** - we promote fair and equitable remuneration of our employees, based on their qualifications, experience, scope of duties and functions. We comply with the provisions of national and international law, in particular the Labour Code, as well as internal regulations in this respect.

We promote conditions that ensure a balance between professional career, private life and other personal needs of employees.

## Relations with stakeholders

**Relations with employees and shareholders** - we promote human rights in relations with employees and shareholders, through the implementation and application of adequate internal regulations, specifying the appropriate procedure, including The Code of Ethics of the Bank Millennium Group, which define the principles shaping healthy, transparent relations with these stakeholder groups.

**Client relations** - we promote sustainable financing, being an incentive for our clients to decarbonize their activities and implement fair and inclusive economic development models, as part of the corporate culture of the Bank Millennium Group. In this regard, we take human rights into account in our relations with our clients by providing financial products and services aimed at promoting social inclusion (preventing exclusion) and non-discrimination and tailored to the individual needs of our clients. In this context, we adopt policies and procedures that ensure an adequate approach to our clients, respecting their right to privacy and ensuring the confidentiality and security of their data.

We treat our clients with respect, not allowing any discrimination based on origin, gender, sexual orientation, family situation, nationality, ethnicity, religion, social status and political beliefs or any individual physical characteristics, health conditions or disability.

**Relations with suppliers and business partners** - we promote respect for human rights in our suppliers and partners. We have developed "Sustainability Guidelines for Bank Millennium Group Suppliers", in which we indicate how we understand compliance with human rights within the supply chain. We expect all Bank Millennium Group suppliers and partners to respect human rights, rejecting forced labour including forced and child labor or any modern form of bonded labor, ensuring fair and equitable remuneration and offering equal opportunities and a working environment free from discrimination and all forms of violence.

**Social relations** - we support the promotion of human rights in the communities around us, ensuring that our activities have a positive impact on the environment and paying particular attention to groups susceptible to or at risk of social exclusion.

### **Compliance with ethical principles**

The Bank Millennium Group recognizes conducting business in a sustainable manner and observing ethical principles as one of the most important principles of its operation, which results from our mission as an entity in the financial sector and the values espoused in the Group, which we treat as key.

We have systems in place to report violations identified by employees. Any employee who has information or reasonable suspicions that there has been a violation of the law, applicable policies, procedures or the applicable Code of Ethics of the Bank Millennium Group is obliged to immediately report this fact through dedicated reporting channels.

We provide anonymous reporting channels, confidentiality of all reports, and we do not take any action against a person who, in good faith, reports information regarding potential violations of the law and applicable policies, procedures or Code of Ethics, or who participates in the report verification procedure, unless the report is false or the information was provided in bad faith.

We have internal communication systems that enable employees to receive current information in real time and provide them with access to information necessary to perform their job duties and exercise employee rights. We also enable employees to present their own information and opinions in internal and external channels.

### **Evaluation and control**

We have implemented a number of solutions, described in the internal regulations of the Bank Millennium Group, the aim of which is to ensure the effective implementation of this policy and monitoring its compliance. The following actions and solutions belong to them:

- **Promoting and valorizing the provisions of the Code of Ethics** among employees, suppliers and business partners.
- **Supplier compliance with the Supplier Sustainability Principles**, which include legal compliance, good environmental and labor practices, consideration of human rights and application of the principles when entering into contracts with third parties.
- **Regularly assessing, monitoring and monitoring human rights risks in the Bank's risk management processes**, in particular those related to employee relations, such as violations of occupational health and safety standards, discrimination or harassment, as well as in relationships with suppliers, non-compliance with labor standards or negative impact on communities.

- **Providing a special, confidential channel for reporting (including anonymously) any irregularities and violations of the Code of Ethics**, as well as other regulations of the Bank, including issues related to human rights.
- **Assessment of incidents detected or reported to the internal supervision unit** regarding non-compliance with employee rights and obligations.
- **Assessment of all situations detected or reported to the internal supervisory unit** in connection with non-compliance with employee rights and obligations.
- **Regular awareness-raising, training and capacity-building activities on human rights** in the corporate context.

### **Communication and monitoring**

This document is made available to the Group's employees on the internal intranet website, and to clients and external entities on the Bank Millennium website under the name Policy on respect for human rights.

The Bank Millennium Group regularly monitors and communicates issues related to compliance with human rights in its annual reports, on the Bank's website dedicated to sustainable development and by participating in various investor surveys and indices that describe the results achieved and implemented actions. We are also rated by analysts preparing the world's leading ESG ratings.