

# *Global Standard on Sustainable Development Rabobank Group*

Human rights, labor rights and land governance policies



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# Introduction

## Sustainability strategy and approach

As a sustainable cooperative bank, sustainability is integrated into all of our business operations. Our inclusive approach is aimed at helping our clients to become progressively more sustainable and at making ourselves progressively more sustainable. We use our financial solutions, industry knowledge and networks to empower clients to future-proof their activities, homes and businesses.

## Transition to a sustainable world

Driven by our cooperative mentality, we work together on solutions that benefit everyone: solutions that are good for our clients, society and the world around us and for ourselves. Our goal is to stimulate the transition to a sustainable world in which taking care of people, nature and the climate go hand-in-hand with (new) revenue models. We support the Sustainable Development Goals, with a particular focus on contributing to the energy and food transitions and realizing a circular economy and the financial wellbeing of our members and other clients.

## About this Standard

This Global Standard on Sustainable Development (Global Standard) outlines what we expect from our clients and business partners with regard to sustainability. It contains mandatory but practical guidelines, and guides our own business operations. The Global Standard comprises four components, namely:

1. The overarching framework that applies to all our clients and business partners and all our products and services (chapters 1, paragraph 2.5, chapter 3 and chapter 4);
2. Core policies that apply to all clients and business partners and address key environmental, social and governance issues (paragraph 2.2.1 - 2.2.4);
3. Theme-based policies on specific issues (paragraph 2.3.1 - 2.3.5);
4. Sector-based policies on issues for specific sectors and value chains (2.4.1 - 2.4.13).

## 1.1 Objectives

### Purpose

The Global Standard supports our business decision-making at all levels and provides a frame of reference for how we want to deal with business opportunities and risks in the context of direct and indirect sustainability impacts.

### Managing impact

The Global Standard aligns with the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD). Our policies address the (potential) direct impacts we could create because of our own operations, as well as the (potential) indirect impacts we could create - both positive and negative - because of our clients' activities and their value chains. The policies outline how we identify, prevent, mitigate, remedy and account for sustainability risks and performance

of our own operations, and of those of our clients and business partners. This includes our assessment of how our clients identify, prevent, mitigate, remedy and account for risks in their value chains.

## 1.2 Policies and Procedures

### Management

Rabobank has a Policies and Procedures Management (PPM) framework in place that defines mandatory requirements relating to (amongst others) the development and structure of policies. Following the PPM-framework, policies are categorized into (i) Global Policies, (ii) Global Standards and (iii) Procedures.

- Global Policies outline the business principles Rabobank wishes to adhere to following its mission and strategy. The Global Policies are high level documents ('why').
- Global Standards include mandatory but practicable guidelines ('what').
- Global Procedures describe how Policies and Standards should be implemented and operationalized in processes. These documents

are usually developed by the commercial departments ('how').

The Global Policy on Sustainable Development outlines the business principles Rabobank wishes to adhere to regarding sustainability following our mission and vision. Following the PPM-framework, this document is a 'Global Standard' given the fact that it describes what we expect from our clients in relation to our business relationship through our products and services that we provide. The hierarchy of the different sustainability policies is depicted below. We refer to the content in this Global Standard as 'policy' or 'policies' (with a lowercase letter). We refer to the entire document as the 'Global Standard on Sustainable Development'.

## 1.3 Scope

This Global Standard applies to the Coöperatieve Rabobank U.A., including all legal entities under its control (>50% capital or voting rights)<sup>1</sup>. It must be applied by all locations, business units, departments and subsidiaries, unless stated otherwise in this Global Standard.



<sup>1</sup> To improve the readability, the users of products and services of Rabobank and all legal entities under its control (>50% capital or voting rights) will be referred to as clients in the remainder of the framework, including the products and services mentioned here. In the case of Private Banking, there is the objective to bring its services in line with the sustainability policy where possible.

## 1.4 Content of this Global Standard

This Global Standard covers three different types of policies:

1. core policies;
2. theme policies; and
3. sector policies.

See chapter 2 for more information on the different types of policies, the applicability to clients and business partners, the policy structure and its practical implications for engaging with clients and business partners.

## 1.5 Related Internal Global Policies & Standards or Relevant Other Documents

This document should be read in conjunction with the following documents, all of which can be found on the Policy House Portal:

- Global Policy on Sustainable Development
- Global Standard on embedding sustainability in credit risk assessment for wholesale clients
- Armaments industry implementation guidelines
- Implementation guidelines extractive industries
- Issue engagement procedure on material sustainability signals involving clients
- Rabobank Sustainability Policy Framework (external version of this Global Standard)
- Risk Appetite Statement Rabobank Group
- Global Policy on Corruption.

## 1.6 Our Commitment to Sustainability Initiatives

With the objective of reaching a higher level of sustainability, Rabobank participates in many global and local initiatives. Examples include the United

Nations Environment Partnership, membership of the World Business Council for Sustainable Development and participation in several round tables, as well as several initiatives of external bodies related to sustainability and/or the financial sector. The key external ones are described below.

### United Nations Sustainable Development Goals

The Sustainable Development Goals (SDGs) were drawn up to end poverty, protect the planet and ensure prosperity and well-being for all. This new global sustainable development agenda must be achieved by 2030. As a cooperative bank wanting to realize social impact and with a mission of Growing a better world together, Rabobank feels a responsibility to make a meaningful contribution to achieving the 17 SDGs. For this reason we have embedded our contribution to the global goals in our strategic ambitions and our strategic priorities have touchpoints with many SDGs. By focusing on these priorities in our decisions, we make a meaningful contribution to the following SDGs in particular: SDG2 (Zero Hunger), SDG7 (Affordable and Clean Energy), SDG8 (Decent Work and Economic Growth), SDG11 (Sustainable Cities and Communities), SDG12 (Responsible Consumption and Production), SDG13 (Climate Action), SDG15 (Life on Land) and SDG17 (Partnerships for the Goals).

### UN Global Compact

Global Compact asks companies to embrace universal principles and to partner with the United Nations. It has grown to become a critical platform for the United Nations to engage effectively with enlightened global businesses.

### UNEP Finance Initiative

The United Nations Environment Programme Finance Initiative (UNEP FI) was established in 1992 as a platform associating the UN and the financial sector globally. It is a global partnership of more than 200 institutions, including banks, insurers and fund managers, working with UNEP to understand the impacts of environmental and social considerations on financial performance. Rabobank endorses the UNEP Statement of Commitment by Financial Institutions on Sustainable Development and is guided by its commitments.

### UN Principles for Responsible Banking

The Principles for Responsible Banking are a framework for ensuring that signatory banks' strategy and practice align with the vision society has set out for its future in the SDGs and the Paris Climate Agreement. Rabobank was one of the first banks to sign up to the Principles for Responsible Banking ahead of the official global launch in September 2019.

### UN Guiding Principles on Business and Human Rights

The UN Guiding Principles on Business and Human Rights (UNGPs) is an instrument consisting of 31 principles implementing the United Nations' "Protect, Respect and Remedy" framework, and provides a global standard for preventing and addressing the risk of adverse impacts on human rights linked to business activity. Rabobank upholds the UNGPs.

### OECD Guidelines for Multinational Enterprises

The mission of the Organisation for Economic Cooperation and Development (OECD) is to

promote policies that will improve the economic and social well-being of people around the world. The OECD provides a forum in which governments can work together to share experiences and seek solutions to common problems. It strives to work with governments to understand what drives economic, social and environmental change. The OECD also sets the international standards on a wide range of things, from agriculture and tax to the safety of chemicals. Rabobank endorses the OECD Guidelines and is guided by its principles.

### Equator Principles

The Equator Principles (EP) is a voluntary risk management framework, adopted by financial institutions, for determining, assessing and managing environmental and social risk in projects and project related finance. It is primarily intended to provide a minimum standard for due diligence and monitoring to support responsible risk decisionmaking.

The EPs apply globally, to all industry sectors and to five specific financial products above certain thresholds. The specific products are: 1) project finance advisory services, 2) project finance<sup>2</sup>, 3) project-related corporate loans, 4) bridge loans and 5) project-related refinance, and project-related

<sup>2</sup> Rabobank defines 'project finance' as a method of finance whereby we look primarily to the revenues generated by a single project, both as the source of repayment and as security for the exposure. Repayment therefore depends primarily on the project's cash flow and on the collateral value of the project's assets. "Project-related corporate loans" are defined by Rabobank as corporate loans whereby the majority of the proceeds are related to a single project. For definitions of "project finance advisory services" and "bridge loans", we apply the definitions of the Equator Principles.

Acquisition Finance. Rabobank applies the EP.

### Finance for Biodiversity Pledge

In the Finance for Biodiversity Pledge financial institutions commit to share knowledge, engage with companies, assess impact, set targets and publicly report on progress by 2024 about the positive and negative impacts of their financing on biodiversity.

### Natural Capital Declaration

The Natural Capital Declaration (NCD) is a global finance-led and CEO-endorsed initiative to integrate natural capital considerations into financial products and services, and to work towards their inclusion in financial accounting, disclosure and reporting. The initiative is jointly convened by the United Nations Environment Programme Finance Initiative (UNEP FI) and the Global Canopy Programme (GCP). Rabobank is a signatory to the NCD and is a member of the NCD Working Groups.

### 1.7 Waiver

If an entity, business line or department can temporarily not comply with this Global Standard or part of this Global Standard, the management of each entity, business line or department must apply for a Waiver. Waivers are required when all or parts of this Global Standard cannot be implemented by the deadline set or when this Global Standard conflicts with local regulation or laws.

The following procedure must be followed when requesting a waiver:

- The management of the entity or business line or department should initiate a waiver request in

writing (using the PPM template for waivers, and sending it to [sustainabilitypolicies@rabobank.nl](mailto:sustainabilitypolicies@rabobank.nl));

- The Group Sustainability & Climate Department decides upon the Waiver request. The Group Sustainability & Climate Department may decide to seek approval from (one or more) Global Management Team(s), or from (members of) the Managing Board;
- The Group Sustainability & Climate Department provides a response to the requestor in writing using the PPM template for waivers;
- The Group Sustainability & Climate Department notifies the Global PPM Coordinator in case a waiver is granted;
- The Group Sustainability & Climate Department keeps a record of all approved and rejected waivers.

### 1.8 Exception and Breach Management Process

See paragraph 5.1.3 for our exception and breach management processes.

### 1.9 Disciplinary Action

Everyone who works for Rabobank is expected to act in accordance with Rabobank's ethical and professional standards of conduct as laid down in Rabobank's Code of Conduct, its internal policies, standards and procedures and/or the applicable national financial-, civil-, criminal, and disciplinary law and industry codes.

Violation of our standards of conduct may have serious consequences for Rabobank, its employees, its clients and business partners. Everyone who works for Rabobank is therefore expected to behave

in accordance with the standards of conduct outlined in this Standard and to discuss undesirable incidents transparently. This is how we live up to our values of professionalism and courageousness as described in our Code of Conduct and how we contribute to the mission and reputation of Rabobank as a rock solid bank.

Violation of the standards of conduct outlined in this Standard may lead to internal disciplinary action, up to and including termination of employment. Depending on the violation, everyone who works at Rabobank may also be subject to (national) disciplinary law, civil proceedings and criminal investigations. If applicable, additional remuneration related measures will be taken in accordance with the Global Policy on Remuneration. In determining the appropriate level of disciplinary action, all relevant circumstances will be taken into account.

The process of a disciplinary action and employees' rights therein are governed by the Global Standard on Disciplinary Action.

# Requirements of the Global Standard

## 2.1 Overview and policy types

### 2.1.1 Policy types

This Global Standard includes three types of sustainability policies:

- **Core Policies** are related to core environmental, social and governance issues and are applicable for our clients in all sectors, through all products and services and for our business partners.
- **Theme Policies** are related to thematic issues that we consider to be material for our business. The theme policies are applicable when the theme is of relevance for a specific client or business partner.

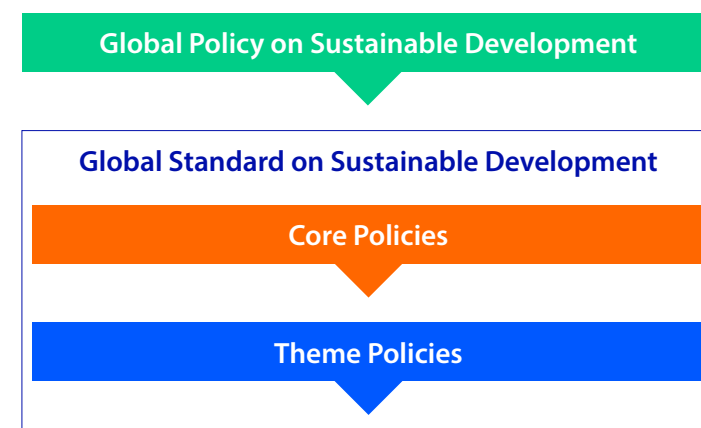
Rabobank has also identified activities the bank does not want to be involved in. It includes processes and the production and trade of specific products. These are described in each of the individual policies and are summarized in the [Rabobank Exclusion List](#). See paragraph 2.5. The Exclusion List is reviewed periodically.

### 2.1.2 Applicability to Clients and Business Partners

Requirements detailed in the core policies are always applicable for all clients and business partners. The theme policies are applicable when the specific theme is of relevance for a client or business partner. The requirements outlined in the Sector policies are only relevant for clients and

business partners operating in those specific sectors, industries or value chains.

### 2.1.3 Policy overview



### 2.1.4 Reading Guide

In this document, definitions are italicized. References to other parts of the document and references to another (internal) Global Standard, Global Policy or other publications are shown in orange.

### 2.1.5 Policy Structure and the Practical Implications for Engaging with Clients

All core, theme and sector policies follow the same structure so that users can easily navigate to those parts most relevant to their needs:

#### Why this policy?

- Each policy starts with a description for both external and internal audiences of the importance, the context and the potential adverse impacts related to the topic or sector.

#### Purpose

- Describes the overall goal the policy aims to achieve

#### Scope

- Describes for which parties in the value chain the policy is applicable

#### The policy

- Each policy starts with a description of Rabobank's commitments on our own activities e.g. by providing and developing products and services, sharing knowledge, connecting our networks and innovating.
- The paragraph 'what we expect of others' sets out the sustainability business principles we expect each client and business partner to adhere to, as a baseline requirement.
- The paragraph 'what we exclude' sets out the activities or clients that are not compatible with Rabobank's business principles on sustainability or our mission. We also summarize them in the Rabobank Exclusion List (see paragraph 2.5).

#### How we monitor performance

- Describes examples of indicators for Rabobank to keep track of the sustainability performance of clients and business partners and how Rabobank may engage with clients. The (potential) adverse impacts of sustainability risks may vary depending on the specific activity, the sector, the size of the client company, the geography, the product Rabobank offers and Rabobank's exposure and relation to the client or business partner. Rabobank can apply different risk based mitigation and implementation measures, with thresholds and frequencies that are proportionate to those risks.

#### How we encourage continuous improvement

- Describes how we want to promote best practices and continuous improvement and engage with our clients and business partners to facilitate sustainability transitions.

#### Practical implications for engaging with clients

There are four sections that are of specific relevance for our client engagement.

- the section 'what we expect of others' describes the values and business principles which we expect each client and business partner to adhere to (or to convincingly commit and work towards to). Rabobank strives for an engagement approach rather than excluding business relations with clients who do not yet meet these expectations: see paragraph 5.1.1 for more information on our approach under 'engagement'. A client that does not adhere to these values and principles and that is not convincingly committed to work towards

these values and principles, is considered non-compliant with our policy.

- The section 'what we exclude' sets out the activities or clients that are not compatible with Rabobank's business principles on sustainability or mission. The activities on this list are not subject to our engagement approach. Clients or activities that are excluded, are considered non-compliant with our policy.
- The section 'how we monitor performance' guides our regular engagement with clients and business partners, keeping track of operational key controls that provide evidence of the (continued) compliance with our sustainability business principles.
- The section 'how we encourage continuous improvement' is included to motivate our clients and business partners to continuously improve beyond compliance with the key controls of our policies.

### Legacy issues

We acknowledge that legacy issues may arise from services provided before the implementation of this policy, or from client relationships entered into before the implementation of this policy. Existing contractual commitments will be honored, but we take into account this policy when renewing or expanding these engagements on a case by case basis.

#### 2.1.6 External Version of our Policies

This Global Standard outlines what we expect from our clients and business partners with regard to sustainability. That is why we also have a public version which is known as the 'Sustainability Policy Framework'.

Colleagues are invited and encouraged to share the external version of our policies with clients and business partners. The external version of our policies can be found on our website.

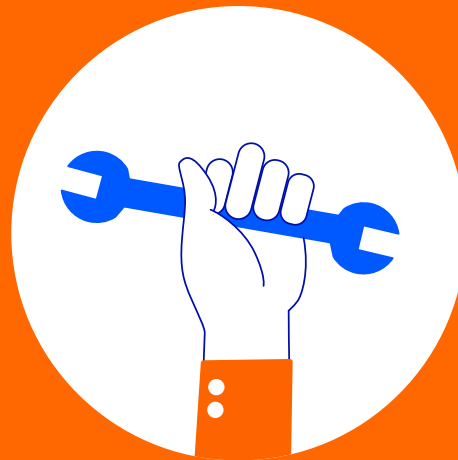
As to the content, there are no differences between the internal version of our policies (the Global Policy on Sustainable Development and this Global Standard on Sustainable Development), and the external version of our policies, the 'Sustainability Policy Framework'. The internal version of our policies does however include more information on the internal processes, key controls and other information that is mandatory based on the Global Standard on Policies and Procedures Management.



## Core Policies



Human Rights



Labor Rights

# Human Rights Policy



## Why this policy?

Human rights are universally protected and everyone is entitled to them regardless of their nationality, race, gender, religion or culture. Underpinned by the principles of dignity, equality and mutual respect, Rabobank believes that the upholding of human rights is crucial for strong and inclusive communities, and considers any infringements upon human dignity unacceptable. We believe that we have the responsibility to respect and uphold the international human rights described in the Universal Declaration of Human Rights and codified in international law<sup>5</sup>. As such, we have identified that client acceptance, provision of loans and leasing products, project finance and equity investments pose our highest potential risk for human rights impacts, and therefore conduct human rights due diligence as a way to proactively manage any potential human rights violations.

## Purpose

The purpose of this core policy is to protect and uphold human rights, and to identify, prevent and mitigate adverse impacts of our own operations, and those of our clients and business partners. It supports our adherence to the United Nations Guiding Principles on Business and Human Rights, the global authoritative standard that guides states to protect

human rights, businesses to respect human rights and victims to be provided with access to remedy. This policy is intended to provide a basis that can protect bottom lines, demonstrate business principles and how to achieve them, facilitate improvements and encourage best practices where possible.

## Scope

This core policy is applicable to our own operations and activities, and to all clients and business partners. It applies proportional to impacts per business type, size, products, activities and geographies, and includes the responsibility and controls over value chains.

## Definitions

**Human rights due diligence:** According to The Office of the High Commissioner for Human Rights, human rights due diligence is a way to proactively manage potential and actual adverse human rights impacts, with four components: (i) identifying and assessing impacts that an enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships; (ii) integrating and taking appropriate action across relevant company processes; (iii) tracking the effectiveness of measures and processes to address impacts;

<sup>5</sup> Rabobank recognizes the human rights as codified in the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the Convention on Elimination of All Forms of Discrimination Against Women, the Convention on the Rights of the Child, the UN Declaration on the Rights of Indigenous Peoples, as well as the International Labor Organization's conventions.



(iv) communicating on how impacts are being addressed and showing (affected) stakeholders that there are adequate policies and processes in place.

### The policy

Rabobank aims to positively affect its own sustainability performance as well as that of its individual clients, client portfolios and wider sectors by providing financial products and services, sharing knowledge and by working together with its networks.

We distinguish between impacts in our direct control and those that are directly linked through our relationships with clients and business partners.

Regarding human rights, for our own activities we will:

- respect and uphold the human rights described in the Fundamental Declaration of Human Rights and codified in international law;
- adhere to the United Nations Guiding Principles on Business and Human Rights;
- promote and contribute positively to human rights wherever and whenever we can;
- periodically assesses human rights risks by analyzing our financial products and services, relationships and portfolios;
- conduct reasonable and appropriate *human rights due diligence* within our commercial relationships, including suppliers and other business relations: see below more about how *human rights due diligence* monitors progress;
- prevent and mitigate adverse impacts on human rights from our own activities and our relationships with clients and business relations, employees and other stakeholders in society;
- include human rights principles in the process of establishing joint ventures or making acquisitions;

- apply country risk and sanction exclusions, including sanctions due to human rights violations;
- conduct thorough research and engage<sup>6</sup> in dialogue with stakeholders in order to provide specific guidance to our employees, managers, directors and members of our Supervisory Board<sup>7</sup>.

Furthermore, as an employer we will fully respect the rights of our employees, as outlined in our [Labor Rights Policy](#).

### What we expect of others

As a values driven organization, we do business with those who share our principles. Therefore regarding human rights, Rabobank does business with clients and other business partners that:

- respect and uphold all human rights as described in the Universal Declaration of Human Rights, and related international legislation and regulations, including the UN Guiding Principles on Business and Human Rights;
- avoid causing or contributing to human rights violations by identifying, preventing, mitigating and accounting for any actual or potential adverse human rights impacts that are related to their operations, products and services through business relationships including clients, as well as business associates and society.

<sup>6</sup> Rabobank recognizes that human rights require meaningful engagement with internal and external stakeholders. Stakeholder engagement is particularly important in relation to identifying, assessing and remedying grievances among any of Rabobank's stakeholders.

<sup>7</sup> Human rights principles form an integral basis for dialogue and decision-making processes in Work Councils, our Ethics Committee, NGOs, unions and other stakeholders.

In practice, we may engage with clients and business partners that do not yet fully meet all our expectations if they have an acceptable timebound plan to do so.

### What we exclude

The [Rabobank Exclusion List](#) defines activities that are incompatible with our mission and principles. We will not provide our products and services to these activities. Regarding human rights, we will not do business with those that:

- knowingly and structurally violate internationally accepted human rights;
- undertake any transaction that may be in conflict with sanctions imposed by the United Nations, the European Union or any other legislated sanctions that apply to the countries in which the bank operates, including human rights sanctions.

### How we monitor performance

Rabobank reviews the performance and progress of clients during the initial credit assessment and at periodic intervals. We do so by applying a risk based approach, and by collecting supporting information that demonstrates:

- compliance with the expectations listed above.

The core features of our *human rights due diligence* process are that it:

- aims at demonstrating that human rights are not infringed;
- varies in complexity according to the size of the business enterprise, the risk of severe human rights impacts and the nature and context of the operations;
- is an ongoing process of identifying and

### At a glance

- Rabobank conducts human rights due diligence in our relationships with our clients and business partners. The Rabobank due diligence process assesses adverse human rights impacts that we may cause or contribute to through our own operations and activities, and the impacts we may be directly linked to through relationships with our clients and their value chains, business partners or other state and non-state entities in countries of our operation.
- Clients and business partners must respect human rights as described in the UN Guiding Principles on Business and Human Rights in their business decisions and require their suppliers to do the same.
- Clients and business partners must know and show they respect human rights in practice. For unavoidable adverse impacts, they must cooperate in remediation through legitimate processes.

assessing actual and potential human rights impacts (on individuals and communities and on their rights), acting upon the findings, tracking the effectiveness of the response and showing how human rights impacts are addressed.

### How we encourage continuous improvement

We encourage the transition towards more sustainable practices and continuous improvement. Specifically regarding human rights, we encourage our clients and business partners to:

- include clauses about compliance with criteria on

- identified potential human rights impacts in their contracts with subcontractors and suppliers;
- be transparent about their risks of causing or contributing to adverse human rights impacts and how they manage those risks;
- be transparent about any violations of human rights it has caused or contributed to and provide for or cooperate in remediation through legitimate processes<sup>8</sup>;
- report publicly about their *human rights due diligence* efforts and results;
- operate effective stakeholder engagement including an operational level grievance mechanism for any adverse human rights impacts they have caused or contributed to, and involve affected stakeholders well before establishing new operations in a process of, and duly recorded, consultation and with respect for the vulnerability of human rights defenders;
- advise Rabobank of grievance related information or signal any non-compliance with this policy.

<sup>8</sup> Even with the best preventive policies and practices in place, Rabobank may inadvertently cause or contribute to an adverse impact. If this is the case, we will endeavour to remedy or co-operate in the timely remediation. Rabobank therefore has grievance mechanisms in place and we expect that the collaborative and multistakeholder initiatives in which Rabobank participates also provide for effective grievance mechanisms and/or other measures of adequate accountability.

# Labor Rights Policy



## Why this policy?

Labor rights are human rights related to relations between workers and their employers. Labor rights are described in various codes and conventions of the International Labour Organization (ILO) and are an integral part of the UN Guiding Principles on Business and Human Rights and the United Nations Sustainable Development Goals (SDGs). The SDGs aim to achieve decent work for all and promote a living wage. Core labor rights include freedom of association and the right to collective bargaining, elimination of forced and compulsory labor (also referred to as *modern slavery*), the abolition of child labor, and the elimination of discrimination in the workplace. Other rights that are widely accepted relate to working conditions such as health and safety and the maximum number of working hours.

## Purpose

The purpose of this core policy is to support labor rights, aimed at protecting both workers and their employers. It is intended to provide a basis that can protect bottom lines, demonstrate business principles and how to achieve them, facilitate improvements and encourage best practices where possible.

## Scope

This core policy applies to Rabobank itself and to all clients and business relations, including their value chains.

## Definitions

*Living wage:* The remuneration received for a standard workweek by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family.

*Modern slavery:* The condition of being forced, by threat or violence, to work for little or no pay, and of having no power to control what work you do or where you do it. Modern slavery includes human trafficking, domestic slavery, forced participation in crime and debt-bonded labor. It is also an economic crime often coinciding with money laundering.

## The policy

Rabobank aims to positively affect its own sustainability performance as well as that of its individual clients, client portfolios and wider sectors by providing financial products and services, sharing knowledge and by working together with its networks. We distinguish between impacts in our direct control and those that are directly linked through our relationships with clients and business partners. Regarding labor rights, for our own activities we will:

- uphold the principles concerning fundamental rights described in the core conventions of the International Labour Organization (ILO) as set forth in the Declaration on Fundamental Principles and Rights at Work<sup>9</sup> and avoid causing or contributing to the violation of labor rights;
- fully respect the rights of our employees, including the freedom of association and the

- right to collective bargaining and provide a safe and healthy work environment;
- promote a corporate culture of human rights and labor rights awareness by means of disseminating and providing access to information and training;
- eliminate discrimination in the workplace and respect diversity and inclusion (including gender, ethnicity, nationality, disability and sexual orientation);
- provide access to grievance mechanisms through which labor related complaints and disputes can be resolved effectively.

#### What we expect of others

Being a values driven organization, we do business with those who share our principles. Therefore regarding labor rights, Rabobank does business with clients and business partners that:

- respect all labor rights as described in the ILO Declaration on Fundamental Principles and Rights at Work;
- identify, prevent, mitigate and account for any actual or potential violation of labor rights caused, contributed to, or that are directly linked to their operations, products and services through business relationships, including their value chains;

<sup>9</sup> Rabobank recognizes the United Nations Convention on the Rights of the Child, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the International Labour Organization's Tripartite Declaration Concerning Multinational Corporations and Social Policy, and the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.

- provide for or cooperate in remediation through legitimate processes for violations of labor rights that they have caused or contributed to;
- be transparent about their risks of causing or contributing to violations of labor rights and how they manage those risks (including *modern slavery*);
- operate effective stakeholder engagement including an operational-level grievance mechanism for any violations of labor rights (including gender-based violence and harassment) that they have caused or contributed to.

In practice, we may engage with clients and business partners that do not yet fully meet all our expectations if they have an acceptable timebound plan to do so.

#### What we exclude

The [Rabobank Exclusion List](#) defines activities that are incompatible with our mission and principles. We will not provide our products and services to these activities.

#### At a glance

- Rabobank aims to protect both workers and their employers by requiring clients and business partners to respect and promote labor rights as described in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and related conventions.
- Clients and business partners need to respect the right to collective bargaining and prevent violations (modern slavery, child labor) and to use their influence with their business partners to do the same.

#### How we monitor performance

Rabobank reviews the performance and progress of clients during the initial credit assessment and at periodic intervals. We do so by applying a risk based approach, and by collecting supporting information that demonstrates that they:

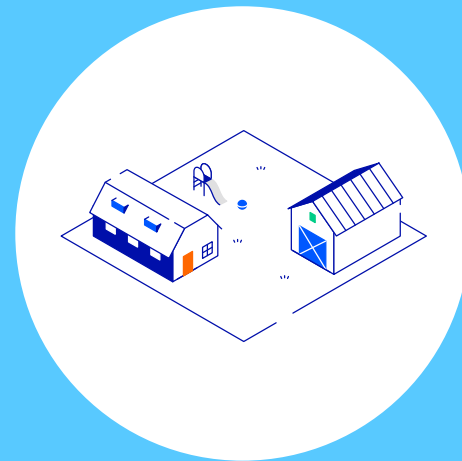
- reconfirm compliance with the requirements listed above and – if that is not yet fully the case – show continuous improvement, notably on the points below;
- apply labor rights considerations in their business decisions, including fair recruitment practices and the prevention of *modern slavery*, and respecting standards on maximum working time;
- respect and encourage equal opportunities and diversity in the workplace (including but not limited to gender diversity);
- work on systematically improving the health and safety of employees and develop a preventive culture in this field;
- are transparent about any breaches of labor rights.

#### How we encourage continuous improvement

We encourage the transition towards more sustainable practices and continuous improvement. Specifically regarding labor rights, we encourage our clients and business partners to:

- determine and work towards paying a living wage to their employees;
- include clauses on the compliance with criteria on labor rights in their contracts with subcontractors and suppliers.

## Theme Policies



Land Governance

# Land Governance Policy



## Why this policy?

Land Governance concerns the rules, processes and structures through which decisions are made about access to land and its use, the manner in which those decisions are implemented and enforced, and the way in which competing interests in land are managed. It also enshrines the concept of *cultural heritage*, and that in many communities, the landscape holds significant cultural value to the communities that live within it. Changes in land use and governance can have both positive and negative economic, social, environmental, and political impacts on communities, families, and other stakeholders. Inherent scarcity of land can lead to profound disputes and conflicts, especially where weak governance exists regarding land tenure, or where there is limited practical state protection of land rights. This can significantly affect communities if they have insufficient countervailing power to defend their legitimate interests.

Rabobank recognizes that across rural populations, different communities can be disproportionately impacted by changes of land use and governance. We recognize that especially our clients in primary production, and food and agriculture value chains can cause or contribute to land governance issues, and that the risks vary depending on the type of commodity and the countries of operation.

## Purpose

The purpose of this policy is to ensure that the financial decisions about changes in access to land and land use respect land rights and do not lead to conflict between different users or other adverse impacts. This policy is intended to provide a basis that can protect bottom lines, demonstrate business principles and how to achieve them, facilitate improvements and encourage best practices where possible.

## Scope

This policy is applicable to clients and business partners if we consider land governance to be material to their activities. This can be the case if they are impacted by, or have an impact on, rules, processes and structures through which decisions are made about access to land and its use. It specifically relates to companies operating in primary production, food and agriculture and extractive sectors and their value chains, but can be dependent on their level of risk and control or influence in their supply chain.

## Definitions

*Cultural heritage*: According to the International Council on Monuments and Sites, *Cultural heritage* is an expression of the ways of living developed by a community and passed on from generation to generation, including customs, practices, places,

objects, artistic expressions and values. Cultural heritage is often expressed as either Intangible or Tangible Cultural heritage.

### The policy

Rabobank aims to positively affect its own sustainability performance as well as that of its individual clients, client portfolios and wider sectors by providing financial products and services, sharing knowledge and by working together with its networks. We distinguish between impacts in our direct control and those that are directly linked through our relationships with clients and business partners. Regarding land governance, for our own activities we will:

- respect legitimate land tenure and the rights of local communities and individuals;
- recognize that Indigenous peoples are a particularly vulnerable group in certain communities and have specific internationally recognized rights;
- promote sound and fair land governance practices, including the Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT), unless a Rabobank Local Standard has substantiated that this is better regulated by local laws and regulations;
- be responsive to grievances we receive regarding land rights conflicts in our engagement with clients.

### What we expect of others

Being a values driven organization, we do business with those who share our principles. Therefore regarding land governance, Rabobank does business

with clients and other business partners that:

- respect legitimate land tenure and the rights of local communities and individuals;
- avoid causing or contributing to conflicts related to land ownership and/or the use or access thereof;
- do not engage in land grabbing practices;
- are aware of the risks of land related disputes in their primary operations and/or in their value chain;
- have sustainable and/or responsible business principles that promote good land governance, and implement appropriate governance structures, policies and management systems; provide accessible and accountable grievance mechanisms.

In practice, we may engage with clients and business partners that do not yet fully meet all our expectations if they have an acceptable timebound plan to do so.

### What we exclude

The [Rabobank Exclusion List](#) defines activities that are incompatible with our mission and principles. We will not provide our products and services to these activities. Regarding land governance, we will not do business related to:

- new land development causing land tenure conflicts with local communities or Indigenous peoples.

### At a glance

- Rabobank requires clients to promote good land governance, and implement appropriate governance structures, policies and management systems which respect legitimate land tenure rights.
- Clients need to apply inclusive business models and alternative forms of investment that may be more beneficial to existing land users and communities, and that do not require commercial transfer of land tenure in weak governance and conflict-sensitive contexts.
- Rabobank encourages its clients to engage with local communities and maintain open, transparent, effective and accessible mechanisms to record and resolve land disputes.

### How we monitor performance

Rabobank reviews the performance and progress of clients during the initial credit assessment and at periodic intervals. We do so by applying a risk based approach, and by collecting supporting information that demonstrates that they:

- know their potential impacts (or contribution to impacts through the value chain) regarding land governance issues, and that they understand local tenure frameworks, including the customary rules, regulations and bureaucratic processes;
- conduct independent social and environmental impact assessments, human rights impact assessments and/or household livelihood impact assessments for new large-scale commercial operations or project finance, and that these assessments identify how the project land

interacts with current land use and occupancy, and that they have analyzed the land tenure related risks in the proposed area and at national level;

- in the case of large-scale operations or project finance, adhere to accepted best practices as described in the UN Declaration on the Rights of Indigenous peoples, if new operations or project locations are proposed on lands owned by Indigenous peoples, and when adverse impacts are expected. Where relevant to the project size and location, the IFC Performance Standard 7 on Indigenous peoples may also be required. The Free Prior and Informed Consent (FPIC) of these affected communities need to also be obtained before the project can proceed;
- prevent or mitigate exposure to land conflict risks in value chains and ensure suppliers are in compliance with applicable regulations, notably on FPIC, commensurate with risks and controls over the value chain;
- engage with relevant stakeholders to identify, prevent and mitigate the risks and remedy potential and actual adverse impacts of changes in land governance and land use, in particular with affected local communities, who often hold considerable information of the lands. Potential adverse impacts need to be assessed and documented, as well as the efforts to avoid or minimize these impacts. The client needs to ensure the information flow to affected communities is culturally appropriate and understandable;
- effectively deal with land governance-related disputes and that they have timebound plans and a proven track record of resolving land

tenure conflicts;

- monitor and ensure their compliance with the land tenure agreements that have been made with communities and others.

### How we encourage continuous improvement

We encourage the transition towards more sustainable practices and continuous improvement.

Specifically regarding land governance, we encourage our clients and business partners to:

- deal responsibly with land governance, including respecting land tenure and land rights and the right to free, prior and informed consent of all stakeholders regarding changes in land ownership or land use, applying a context or conflict analysis as well as addressing gender issues;
- avoiding commercial, large scale changes in land tenure rights if alternatives exist that prevent or mitigate adverse impacts to Indigenous peoples and other local communities, including the appropriate compensation in monetary terms and/or through culturally appropriate sustainable development opportunities;
- apply inclusive business models and a landscape approach that looks at the total integral balance of land usage beyond one individual economic activity;
- operate grievance mechanisms that have proportionality, are communicated in a culturally appropriate and understandable way, are accessible, transparent and accountable to all stakeholders, and provide appropriate protection of environmental and human rights defenders that prevents retribution;

- for value chain clients, and commensurate with risks and position in the value chain, apply their control or influence, knowledge and networks (e.g., relevant round tables) to ensure (agribusiness) supply chains are in alignment with voluntary schemes, notably the VGGT and that the rights of Indigenous peoples, pastoralists and other vulnerable groups of local communities are properly addressed.

# Exclusion list

## General information

### Excluded Activities

The Exclusion List defines activities that are incompatible with Rabobank's mission and vision. Rabobank will not provide its services to directly facilitate the Excluded Activities listed in the Exclusion List. This list is based on Rabobank policies and the exclusion list of the IFC. Please note that we may choose to do business with clients involved in Excluded Activities, provided that our services will not be used directly for the excluded activities.

### Excluded Clients

Some Excluded Activities are considered to be so detrimental to sustainable development, that Rabobank does not want to enter into business with companies involved in these activities. If and when entering into business with a company is excluded in its entirety due to involvement in Excluded Activities, this is explicitly mentioned in the list below.

### Legacy issues

We acknowledge that legacy issues may arise from services provided before the implementation of this policy, or from client relationships entered into before the implementation of this policy. Existing contractual commitments will be honoured, but we will not expand or renew these engagements. Practical implications will be determined on a case by case basis.

## Excluded Activities

Rabobank will not provide its services to directly facilitate activities listed below:

- new land development causing land tenure conflicts with local communities or Indigenous peoples.

## Excluded Clients

In addition, Rabobank does not want to enter into business with clients or business partners that:

- knowingly and structurally violate internationally accepted human rights;
- undertake any transaction that may be in conflict with sanctions imposed by the United Nations, the European Union or any other legislated sanctions that apply to the countries in which the bank operates, including human rights sanctions.

# Roles and responsibilities

The responsibility for the delivery of this Global Standard on Sustainable Development is that of all Rabobank employees. All employees that prepare and conduct approval and/or review of Rabobank clients and transactions with other business partners are required to use these guidelines to structure their analysis, with the ultimate responsibility resting with the Managing Board. This Global Standard is implemented according to Rabobank's Three Lines of Responsibility model (3LoR). First-line functions own and manage risks within the bank, the second line functions (Risk Management and Compliance) oversee and advise on risk. An independent third-line function (Audit) provides assurance on the effectiveness of the first and second lines of responsibility. The 3LoR model provides clear division of activities and responsibilities in risk management across the organization.

## 4.1 First Line of Responsibility

### 4.1.1 Business Unit Management

The management of the business units or other entities of Rabobank is responsible for appraising the policy issues in their own activities, services and markets and for taking appropriate steps to ensure that clients and business partners meet our policy requirements.

The alignment of local credit policies, client acceptance tools, and financing conditions with the Global Standard on Sustainable Development is the

responsibility of Rabobank management at the subsidiary or local level, as appropriate for their geographies and products/services. These local policies, standards and procedures can only be approved after a consultation process with the Global Standard Owner, the Group Sustainability & Climate Department.

### 4.1.2 Business Units

The primary responsibility for the application of the Global Standard on Sustainable Development lies with the Business Units. The Business Units are responsible for:

- Identifying material sustainability risks and issues that are relevant for their client portfolio and individual clients.
- Periodically providing an explicit judgement on whether the client (fully) meets the expectations as set out in the Global Standard on Sustainable Development.
- Completing a sustainability assessment on clients using Client Photo tooling (GAIA, Duurzaamheidsmatrix or Rural Client Photo) if applicable: see further paragraph 4.1.
- Completing a sustainability assessment on business partners.
- Following-up on material sustainability concerns on own initiative or when requested by the Group Sustainability & Climate Department and engage with client on improving their sustainability performance.

### 4.1.3 Credit analysts

The Credit Analyst is responsible for addressing and weighing non-financial and sustainability risks (including those identified in the theme and sector policies) in the credit application and the credit process.

## 4.2 Second Line of Responsibility

The Second Line of Responsibility, including Credit Approval, proactively challenges the risk taking by the first line through analysis, advice and opinions. The Second Line of Responsibility also proactively advises on compliance matters and provides effective & efficient approval and oversight via delegated authority.

## 4.3 Third Line of Responsibility

The Third Line of Responsibility (audit) provides independent assurance, advice and insights on the quality and effectiveness of internal governance, internal control, risk management and risk reporting. Furthermore, the Third Line of Responsibility performs a periodic assessment of the quality and effectiveness of accountabilities, responsibilities and activities.

## 4.4 Group Sustainability & Climate Department Responsibility

The Group Sustainability & Climate Department writes and updates the Global Standard on Sustainable Development (at least every two years). The Global Standard on Sustainable Development is approved by the Managing Board. In the context of the Global Standard on Sustainable Development, the Group Sustainability & Climate Department performs the following tasks:

- Developing further guidance (if needed) for Know-Your-Customer analysts, Credit Analysts and Relationships Managers on the interpretation and implementation of the Global Standard on Sustainability.
- Providing an expert opinion for clients on the "high sustainability risk list" following the Global Standard Embedding Sustainability in Credit risk assessment for Wholesale clients.
- Following-up on material sustainability concerns, following the Issue engagement procedure on material sustainability signals involving clients.
- Acting as the primary point of contact for NGOs and other civil society groups and actively engage with them in dialogue on signals, trends and concerns and on Rabobank's Sustainability policies.

# Implementing, Monitoring & Reporting

## 5.1 Implementing

### 5.1.1 Implementing - General principles

Responsibility, transparency and accountability  
Our clients should avoid causing or contributing to adverse social and environmental impacts. An adverse impact is a negative effect that goes against desired conditions in our policies. They should seek to prevent or mitigate an adverse impact when the impact is directly linked to their operations or products and services, and they should account for how they address their actual and potential adverse impacts. When needed, they need to provide remedy on grievances. In addition, they are responsible for correctly and transparently documenting their steps towards sustainability. Rabobank considers this process of identifying, preventing, mitigating and being accountable to be a necessary and integral part of our clients' business decision making and risk management systems. It forms the basis of our implementation framework for client assessment and client relationship management, and has been consistently applied in all of our sustainability policies.

#### **Materiality**

The scope of our policies is based on the principle of materiality and our exposure to risk, which means we limit client and business partner assessments to the potential adverse impacts that we and our stakeholders consider to be material. We determine

materiality based on the impact of issues, relevance over time and on whether a client has the ability to create a direct or indirect impact on society and/or the environment, be it positive or adverse. We also take our clients' industry and their countries of operation into account.

#### **Regular Engagement**

We are aware that the process of implementing sustainable management standards and practices is challenging and takes time. We accept that some clients or business partners are more advanced than others in their ability to show significant progress of implementing environmentally and socially responsible management practices, and of responsible purchasing practices. Applying a risk based approach, we may engage with clients because we believe that facilitating clients and business partners to improve their sustainability performance demands meaningful and proactive dialogue. We aim to constructively share our knowledge and our networks with our clients to motivate them to responsibly manage their sustainability impacts.

In line with our values and mission, Rabobank primarily takes an engagement approach towards clients and business partners who share our business principles rather than excluding business relations with clients who do not yet fully meet

all expectations as set out in our policies (see further the 'What we expect of others'-sections of our policies). Where needed we ask clients to convincingly commit and work towards to our expectations.

The activities listed on [Rabobank Exclusion List](#), however, are not subject to our engagement approach, these activities are outside Rabobank's risk appetite and remain incompatible with our mission and business principles.

#### **Quality and responsiveness**

We encourage our clients to implement good practices, including monitoring and adaptive management, so that they can be responsive to changing conditions, and can avoid or minimize their adverse impacts. We help them identify and resolve problems to improve their sustainability performance and minimize risks. This approach enables us to gradually diminish unsustainable operational practices, and to support our clients improve their sustainability performance, their business success, and their contribution to society in general.

### 5.1.2 Implementing measures for credit clients Risk-based approach

Rabobank implements this policy in a risk based manner. The impact of sustainability risks may vary depending on the specific activity, the sector, the size of the client company, the geography, the product Rabobank offers and Rabobank's exposure and relation to the client or business partner. Rabobank can apply different risk based mitigation and implementation measures, with thresholds and

frequencies that are proportionate to those risks.

#### **Assessment process**

The Sustainability Assessment is embedded in the Credit Risk Assessment process for corporate clients with a credit exposure above a EUR 1 million threshold.

Rabobank Relationship Managers use a sustainability assessment tool (Client Photo) to gain insight into client approaches and achievements related to environmental, social and governance related matters. The Relationship Managers profile their clients performance and assign them a rating of A, B, C, D+ or D, as follows:

#### **Rating Description**

- A Outperformer
- B Average performer
- C Underperformer
- D+ Non-compliant with sustainability policies but has a sufficiently ambitious timebound plan in place to become compliant.
- D Non-compliant with sustainability policies and without a sufficiently ambitious timebound plan in place to become compliant.

This sustainability assessment provides a basic insight into relative sustainability performance and enables Rabobank to identify frontrunners in a sector. This is a robust check on whether clients are compliant with Rabobank policies and also provides valuable input for strategic discussions with clients.



**High sustainability risk list**

Rabobank's Sustainability Department maintains a list of high sustainability risk clients. The criteria for including clients on this list is detailed in the Global Standard on embedding sustainability in credit risk assessment for wholesale clients. It includes:

- a known or alleged breach of Rabobank policies;
- a group exposure of more than EUR 200 million combined with activities in one or more high risk sectors;
- exposure to controversies; or
- serious reputational risks.

**Expert opinion sometimes required**

For clients on the high sustainability risk list, a Rabobank Sustainability Expert is responsible for providing an expert opinion. The Relationship Manager then takes into account the information, considerations and opinion of the Sustainability Expert in the credit application. The Credit Analyst verifies whether an expert opinion is required for the credit application and takes into account the information, considerations and opinion of the Sustainability Expert in the credit application.

**5.1.3 Legality, engagement, non-compliance, remediation and grievance mechanisms Legality**

The Rabobank sustainability policies include binding conditions between the bank and its clients based on potential adverse impacts that we consider to be material. Contractual clauses regarding compliance with our sustainability policies may be inserted into the relevant contracts or letters for prospects. Should serious issues that breach our policy and/or international norms and standards not be rectified through engagement,

Rabobank may decide to terminate the client relationship.

**Engagement on issues**

Rabobank has engagement processes in place to follow up signals on material adverse sustainability impact. When such signals involve our clients, our 'Issue Engagement Process' is triggered. Rabobank reports on these engagements in an anonymized way in our Annual Report to strike a balance between external accountability and client confidentiality.

If we have reason to believe the client does not comply with the conditions described in our sustainability policies, or that the client shows insufficient progress integrating sustainability measures in its daily operations, we will engage with the client to submit a sufficiently challenging timebound plan, which describes how the client intends to improve its practices in the future, and which includes specific goals and credible timescales.

**Non-compliance**

Rabobank accepts a certain degree of risk as a result of clients that are not (yet) compliant with Rabobank's Global Standard on Sustainable Development. Compliance is monitored for clients with an exposure above the EUR 1 million threshold via the Sustainability Assessment (Client Photo): see further paragraph 4.1 above. The risk appetite for non-compliance with our Global Standard on Sustainable Development is integrated into Rabobank's Risk Appetite Statement (internal document that limits the nature and extent of risks

Rabobank is willing to take).

Rabobank monitors each quarter whether the non-compliance risk stays within the established risk parameters for clients with an exposure above the EUR 1 million threshold.

**Remediation**

Even with the best policies and practices in place, Rabobank may cause or contribute to an adverse impact that it has not reasonably been able to foresee or prevent. If this happens, Rabobank will endeavor to remedy or cooperate in the remediation of the situation. In case of direct link, Rabobank will endeavor to allow the relevant client to provide a remedy.

**Grievance mechanisms**

Rabobank has a whistleblower policy for employees, including contractors and directors. Our whistleblower program is implemented at regional and/or local level, and all entities within the Rabobank have an external hotline or alternative external reporting mechanism. Whistleblowers can confidentially report concerns via telephone and email to an independent trusted party on a 24/7 basis, and where local legislation permits or prescribes, they can also report anonymously. All whistleblowers acting in good faith are protected from retaliation. The whistleblower policy is also available to former employees of Rabobank. A separate complaint channel is available for clients and other stakeholders. Stakeholders also have the possibility to recourse to the OECD National Contact Point (NCP). Rabobank will abide by the decisions of the NCP.

**5.2 Monitoring & Reporting****5.2.1 Monitoring**

Compliance with our sustainability policies is monitored by the first line as part of their day-to-day business and via our implementing measures: see further paragraph 5.1.2. Internal compliance with our sustainability policies and the way in which the implementation measures are carried out, is also monitored. There are several monitoring checks in place:

- Risk appetite limit: The Rabobank Group Risk Appetite Statement includes a risk appetite limit on the number of clients that are not compliant with the Global Standard on Sustainable Development and without a sufficiently ambitious management action plan to comply within three years (at a maximum).
- Client progress assessment: Monitoring of progress towards establishing full coverage of a client assessment (see paragraph 5.1.2) for all clients with an exposure above the EUR 1 million threshold.
- Ethical dilemmas: Cases arising from the application of sustainability policies can be brought to the attention of Rabobank Ethics Office and the Rabobank Ethics Committee can be consulted to provide guidance

This corresponds with the following controls:

### *Control Description*

#### **Control 1:**

Enabling each Entity, business line or department to implement the requirements associated with this Global Standard, by providing clear communication regarding the document and the associated changes as indicated by PPM Template.

#### **Control 2:**

Implementing the Global Standard on Sustainable Development by the First Line of Responsibility.

#### **Control 3:**

Using a Sustainability Assessment tool for all clients with an exposure above the EUR 1 million threshold. Statistics are organized to evaluate the quality and response time of the client assessments.

#### **Control 4:**

Periodic updating of the Global Standard on Sustainable Development based on the "Global Standard on PPM".

### *5.2.2 Reporting*

- Quarterly internal reporting on the number of clients that are not compliant with the Global Standard on Sustainable Development and without a sufficiently ambitious management action plan to comply within three years (at a maximum).
- Annual reporting on the Issue Engagement Process (see paragraph 1.7) in an anonymized way in our Annual Report to strike a balance between external accountability and client confidentiality.
- Annual reporting on the coverage of the Sustainability Assessments: see paragraph 5.1.2.

# Annexures

## Annex I - References

### CORE

#### *Human rights References*

- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- Convention on Elimination of All Forms of Discrimination Against Women
- Convention on the Rights of the Child
- UN Declaration on the Rights of Indigenous Peoples
- UN Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights

#### *Labor rights References*

- ILO Declaration on Fundamental Principles and Rights at Work
- IFC Performance Standard 2 on Labor and Working Conditions
- ILO Fundamental Declaration on Labor Rights
- OECD Guidelines for Multinational Enterprises
- Rabobank Statement on Modern Slavery
- Tripartite Declaration Concerning Multinational Corporations and Social Policy
- UN Convention on the Rights of the Child
- UN Guiding Principles on Business and Human Rights
- UN Sustainable Development Goals (SDGs)

### THEME

#### *Land governance References*

- IFC Performance Standard 7 on Indigenous Peoples.
- Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT).
- UN Declaration on the Rights of Indigenous Peoples



***Rabobank***