



Human Rights Policy

Banco de Crédito e Inversiones

July 2024

I. INTRODUCTION

Throughout its 87-year history, Bci has sought to ensure that all its activities have a meaning and purpose consistent with the Corporate Vision and Mission, as well as with the values of Integrity, Respect, and Excellence.

In its constant effort to comply with existing regulations and in line with best practices and international standards, the Corporation values and respects the human rights of all individuals, groups, and communities with which it interacts.

This commitment not only involves the respect and promotion of human rights, but also extends to the adoption of policies and processes to identify, prevent, or mitigate risks in this area and, when necessary, repair the consequences of any act or conduct attributable to Bci that has infringed such rights.

At Bci we understand that respect for human rights is a global standard of conduct applicable to all companies, and that it entails the responsibility to comply with the legal system related to the protection of human rights.

II. SCOPE

This Human Rights Policy (the "Policy") applies to all employees of the Bank and its domestic subsidiaries.

III. GENERAL DEFINITIONS

Human rights: These rights are inherent to all human beings, regardless of race, gender, nationality, ethnicity, language, culture, religion, sexual orientation, or any other condition. Human rights include the right to life and liberty, freedom from slavery or torture, and freedom of opinion and expression. Human rights are guaranteed by the Constitution of Chile and Chilean law, as well as by international treaties ratified by our country, customary international law, the general principles of law, and other sources of international law.

- Characteristics of human rights: Human rights are:
 - Universal: They apply to everyone.
 - Inalienable: They cannot be transferred.
 - Interdependent: They are interrelated.
 - Indivisible: They are complementary and cannot be separated.



- Bci's Vision: We aspire to be regional leaders in innovation, accessibility, and customer experience, and to be recognized as an excellent place to work and grow professionally.

- Bci's Mission: Bci is a Corporation of financial solutions that participates in all the business areas and financial operations allowed under the General Banking Law, providing the community with efficient, high-quality products and services, continuous technological innovation, prudent risk management policies, and stringent ethical standards that must be followed by everyone who works in its companies. The Corporation is committed to ensuring that its objectives and policies are achieved within a framework that emphasizes its four fundamental pillars: shareholders; customers and suppliers; employees and their families; and society.

- Mission Pillars:
 - Shareholders: Business policies and decisions should always aim to increase the equity that shareholders have invested in the company, ensuring that the return on their investment is higher than the average of the banking system, while incurring normal risk levels for the businesses in which the Corporation operates and providing the highest possible level of transparency in its conduct, in accordance with the current legislation, regulations, and ethical framework.

 - Customers and suppliers: The products and services that Bci companies provide to their customers must be of the highest quality, competitively priced, innovative, and designed to meet their needs effectively and in a timely manner. We must always remember that customers are the basis of our Institution's success, and we therefore aim to establish long-term business relationships with them. With suppliers, the focus is on cultivating mutually beneficial relationships, loyalty over time, and high standards of quality, compliance, and transparency.

 - Employees and their families: Our Corporation must ensure that all our employees have a decent quality of life, stable work, and opportunities for personal, professional, and family development; that good performance and individual and group effort are adequately remunerated and encouraged; and that guidelines and standards are provided for maintaining an excellent work environment and stringent professional and ethical behavior. We define ourselves as a family-responsible company that is committed to providing the conditions for our employees to balance their work and their personal and family life.

 - Society: Our Corporation is committed to conducting its business and activities in accordance with the current legislation, both domestically and in the foreign markets in which we operate, and to adhering to ethical principles that ensure respect for the rights and interests of others, in accordance with socially accepted and established norms. We are interested in contributing effectively to maintain a healthy environment and to increase the country's social, cultural, and economic heritage, through support for initiatives in this direction.



IV. BACKGROUND

Bci is committed to respecting internationally recognized human rights, as established in the following documents:

- International Bill of Human Rights, which, in turn, considers:
 - o Universal Declaration of Human Rights;
 - o International Covenant on Civil and Political Rights; and
 - o International Covenant on Economic, Social, and Cultural Rights.

- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and its Follow-up.

Bci also formally adheres to voluntary standards and initiatives that promote respect for human rights, such as:

- o United Nations Global Compact;
- o Sustainable Development Goals (SDGs);
- o United Nations Principles for Responsible Investment (PRI), signed by Bci Asset Management Administradora General de Fondos S.A.;
- o Green Agreement spearheaded by the Chilean Finance Ministry, signed by the Bci Corporation;
- o Chilean National Action Plan for Business and Human Rights; and
- o Global Reporting Initiative (GRI) Standards for Sustainability Reporting.

Bci guarantees respect for human rights through the promotion of corporate behavior that is reflected by the Bank's Mission, Vision, and Value Framework and its internal rules and policies.

These include the Code of Ethics, the internal occupational health and safety regulations, the sustainability strategy, and the diversity and inclusion policy, as well as the various policies and procedures for personnel management, corporate governance, supplier management, operations, customer relations, risk management, and crime prevention, among other guidelines.

This Policy harmonizes and expresses these existing commitments based on a comprehensive approach to respect for human rights, following the international lexicon.

V. HUMAN RIGHTS PROTECTION

As stated in the *UN Guiding Principles on Business and Human Rights*, although companies can have an impact on practically the entire spectrum of internationally recognized human rights, the particular characteristics of certain acts, operations, or activities could entail or generate a greater risk of violation of one or more human rights.

Accordingly, the following human rights are specifically protected under this Policy.



- In employee relationships:
 - Bci prohibits any and all discrimination on the basis of ethnicity, ideology, socioeconomic status, religion, culture, gender, age, sexual orientation, nationality, physical traits, disability, or any other condition contemplated in the labor legislation;
 - Promotes diversity and inclusion by valuing differences and the contribution that each person makes to the organization, with special focus on the inclusion of the following priority groups: people with disabilities, the elderly, migrant workers, and women;
 - Fosters a culture of learning, which provides a competitive advantage for the Bank's cultural transformation and the professional development of its employees, through continuous training and the creation of a training ecosystem;
 - Ensures adequate rest and leisure time for its employees, while promoting quality of life;
 - Protects people against sexual and workplace harassment;
 - Prioritizes occupational health and safety and prevents work-related risks;
 - Guarantees employees' right to freedom of association and collective bargaining; and
 - Provides fair and dignified compensation in line with employees' functions, responsibilities, and skills.

- In customer relationships:
 - Bci facilitates access to financial services for all people in Chile, through high-quality digital financial solutions;
 - Promotes financial education among all the Bank's stakeholders;
 - Ensures that customers make their decisions regarding our products and services in a free and informed manner, with complete autonomy and in full knowledge of the associated benefits and implications;
 - Safeguards the privacy and confidentiality of the information of the Bank's customers, employees, and suppliers;
 - Analyzes the environmental and social risks involved in financial decisions and credit policies; and
 - Promotes the incorporation of human rights policies by Bci's large corporate clients, together with the execution of periodic risk assessments on child and forced labor.

- In supplier relationships:
 - With regard to contracting services, Bci takes into account compliance with the labor rights of external employees, in accordance with the provisions of the Chilean Law on Subcontracting;
 - Promotes safe and healthy working conditions for external employees of contractor companies that provide services on the Bank's premises;



- o Promotes labor inclusion when contracting services that involve the presence of external employees who work at Bci;
 - o Contributes to the elimination of child and forced labor in services provided to Bci by supplier companies, by requiring that all external employees be of legal age; and
 - o Disseminates and promotes education on respect for human rights in our supply chain, thus encouraging compliance with human rights due diligence among large suppliers.
- In community relationships:
- o Bci supports the eradication of corruption in all forms, including extortion and bribery;
 - o Reduces and offsets the operation's environmental impacts, to help ensure a healthy and clean environment;
 - o Observes and promotes the rules of free competition that safeguard the right of companies and individuals to participate in the market under equal conditions, to contribute to the development and stability of the country;
 - o Collaborates with nongovernmental organizations (NGOs) and institutions for the promotion of human rights;
 - o Helps the most vulnerable population in national emergency situations;
 - o Promotes financial inclusion and fosters the sustainable growth of SMEs in Chile; and
 - o Supports the Sustainable Development Goals (SDGs).

VI. REPORTING CHANNELS

As of 2024, Bci has a single reporting channel, called *Canal de Confianza Bci*, which combines and replaces the four previous channels: Bci Te Escucha, Qué Hago, Fraud Prevention, and Criminal Risk Prevention and Free Competition. Under the new system, these four topics are consolidated on a single platform to address the concerns of our stakeholders: namely, customers, employees, and the community (<https://canalesdeconfianzabci.ines.cl/canalesdeconfianzabci/formulario/>). In the case of suppliers, concerns or complaints can be reported using the channels established in the Corporation's Purchasing Policy, by sending an email to etica.proveedores@bci.cl.

The reporting channels provide a safe, simple, and confidential space where users can make inquiries or raise concerns about any situation related to breaches of trust, legal or regulatory issues, or ethical principles, so that they can make informed, responsible decisions and receive support.

The channels can be used for any type of consultation related to fraud prevention, crime prevention, sexual or workplace harassment, use of privileged information, conflicts of interest, inappropriate behavior by customers, suppliers, or public bodies, and so forth.

VII. IMPLEMENTATION AND COMMUNICATION OF THE POLICY

As part of the implementation process for this Policy, Bci undertakes the following commitments:

- Produce an updated report every two years on our human-rights-related risks and generate action plans to manage the potential impacts;
- Integrate human rights in the Corporation's management and communication systems and its employee awareness plans;
- Identify indicators for monitoring compliance with our commitments;
- Periodically communicate our human rights objectives and performance to all the Bank's stakeholders; and
- Define the applicable resolution and reparation mechanisms for any potential negative impacts related to human rights that the Corporation or any of its employees may have caused or contributed to, in accordance with our internal procedures and the current legislation.

VIII. COMPLAINT MANAGEMENT

Bci's Ethics Committee is responsible for analyzing and resolving any complaints received by the Bank regarding possible violations of this Human Rights Policy, in accordance with corporate procedures and current legislation.

IX. DURATION OF THE POLICY

This Policy was approved by the Executive Committee of the Board of Directors on 6 April 2021, and it has been in force since that date. It was subsequently modified by the Executive Committee of the Board at a meeting held on 18 July 2024.

X. DOCUMENTS CONSULTED DURING THE DEVELOPMENT OF THIS POLICY:

- **GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS: IMPLEMENTING THE UNITED NATIONS "PROTECT, RESPECT, AND REMEDY" FRAMEWORK (OFFICE OF THE UNITED NATIONS HIGH COMMISSIONER FOR HUMAN RIGHTS).**
- **- A GUIDE FOR BUSINESS: HOW TO DEVELOP A HUMAN RIGHTS POLICY (OFFICE OF THE UNITED NATIONS HIGH COMMISSIONER FOR HUMAN RIGHTS).**
- **UNIVERSAL DECLARATION OF HUMAN RIGHTS.**
- **INTERNATIONAL COVENANT ON CIVIL AND POLITICAL RIGHTS.**
- **INTERNATIONAL COVENANT ON ECONOMIC, SOCIAL, AND CULTURAL RIGHTS.**
- **INTERNATIONAL LABOR ORGANIZATION (ILO) DECLARATION ON FUNDAMENTAL PRINCIPLES AND RIGHTS AT WORK AND ITS FOLLOW-UP.**
- **UNITED NATIONS PRINCIPLES FOR RESPONSIBLE INVESTMENT (PRI).**
- **GREEN AGREEMENT OF THE CHILEAN MINISTRY OF FINANCE.**
- **CHILEAN NATIONAL ACTION PLAN FOR BUSINESS AND HUMAN RIGHTS.**
- **BCI CODE OF ETHICS.**



- **BCI OCCUPATIONAL HEALTH AND SAFETY REGULATIONS.**
- **HUMAN RIGHTS POLICIES OF CAIXABANK (SPAIN), SCOTIABANK (CANADA), ABN-AMRO (NETHERLANDS), WESTPAC GROUP (AUSTRALIA), AND 30 LOCAL AND INTERNATIONAL COMPANIES.**
- **THE BANKTRACK HUMAN RIGHTS BENCHMARK 2019.**
- **“EMPRESAS Y DERECHOS HUMANOS: NUESTRO COMPROMISO,” A GUIDE PUBLISHED BY THE CHILEAN CONFEDERATION OF PRODUCTION AND COMMERCE (CPC), ACCIÓN EMPRESAS, GLOBAL COMPACT NETWORK CHILE, AND ILO.**
- **BASILINE STUDY ON BUSINESS AND HUMAN RIGHTS, BY THE HUMAN RIGHTS CENTER OF THE DIEGO PORTALES UNIVERSITY LAW SCHOOL.**