



# **POLICY FOR THE PROTECTION AND RESPECT OF HUMAN RIGHTS**

**Board of Directors**

*This document is a translation of and original text in Spanish. In case of any discrepancy between the English and the Spanish version, the Spanish version will prevail.*

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## 1. INTRODUCTION

The Board of Directors of Bankia, S.A. (hereinafter, Bankia), always in accordance with the Code of Ethics and Conduct and the Policy on Responsible Management, and inspired by the premises set out in the Business and Human Rights Principles of the United Nations, expresses the bank's commitment to respecting human rights to carry out its business and financial activities in a legitimate manner, in line with the highest international standards in this field and within its scope.

## 2. REACH AND SCOPE

Bankia considers that respect for and effective guarantee of human rights are fundamental and indispensable elements for the sustainable development of companies and the societies in which they operate.

To this end, Bankia undertakes and will, within its scope of responsibility, implement the following commitments:

- ❑ Respect human rights in the different spheres of activity (professionals, customers, suppliers and commercial partners, and society as a whole), implementing prevention, communication and penalty mechanisms.
- ❑ Establish a human rights policy, with special emphasis on:
  - Assessing and understanding the socio-economic environment.
  - Recognising and respecting the identity of individuals and their communities.
  - Establishing a proactive dialogue system with Bankia stakeholders.
- Promoting awareness and compliance with the commitments with Bankia's other activities.
- ❑ Establishing due diligence on human rights in the areas covered by this policy. This commitment requires identifying and evaluating the potential impacts on human rights; integrate the conclusions of the impact assessments into Bankia's internal processes and take the appropriate measures to prevent and mitigate potential impacts; monitor and verify the effectiveness of these measures; and, finally, externally report on the measures adopted.

## 3. REGULATORY FRAMEWORK AND INTERNATIONAL STANDARDS.

Bankia, as a bank that provides financial products and services, operates within the following regulatory framework on Human Rights and international standards, which it undertakes to observe in all its activities and relationships:

- ❑ Universal Declaration of Human Rights of 10 December 1948.
- ❑ International Covenant on Civil and Political Rights of 16 December 1966.
- ❑ International Covenant on Economic, Cultural and Social Rights of 16 December 1966.
- ❑ European Convention of Human Rights.

- ❑ European Convention for the Protection of Human Rights and Fundamental Freedoms, 4 November 1950.
- ❑ European Social Charter or Charter of Turin, European Social Charter, 18 October 1961.
- ❑ Fundamental Charter of Human Rights, of 18.12.2000.
- ❑ Guiding Principles on Business and Human Rights, 2011.
- ❑ International Covenant on Civil and Political Rights of the United Nations.
- ❑ International Covenant on Economic, Cultural and Social Rights of the United Nations.
- ❑ Global Compact of the United Nations.
- ❑ Declaration of Fundamental Principles and Rights at Work of the ILO.
- ❑ Sustainable Development Goals of the UN.
- ❑ The United Nations Declaration on the Rights of Indigenous Peoples.
- ❑ The Principles for the Empowerment of Women.
- ❑ The OECD Guidelines for Multinational Enterprises.
- ❑ The Principles for Responsible Investment of the United Nations.
- ❑ The Financial Initiative of the United Nations Environment Program.
- ❑ The Equator Principles of the International Finance Corporation.
- ❑ The International Convention on the Rights of the Child.
- ❑ The International Convention on All Forms of Racial Discrimination.
- ❑ The Convention on the Rights of Persons with Disabilities.
- ❑ The Convention for the Elimination of All Forms of Discrimination against Women.
- ❑ The International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.

#### 4. COMMITMENTS OF THE POLICY

Bankia will respect and protect compliance with Human Rights in relation to the stakeholders involved in its activity. For this reason, our Policy of Respect for and Protection of Human Rights applies to four areas of action: (i) professionals, (ii) customers, (iii) suppliers and commercial partners and (iv) the company as a whole.

##### 4.1. WITH THE PROFESSIONALS

Bankia professionals are the company's most important asset, therefore, the entity considers human rights a fundamental pillar in its relationship with its professionals. Bankia undertakes to:

- Comply with applicable legislation in force.
- Promote diversity, inclusion and equal opportunities.
- Protect against sexual and gender-based harassment and against discriminatory attitudes and abuse of authority.
- Guarantee freedom of expression and opinion.
- Freedom of association, collective bargaining and the right to strike.
- Ensure safety in the workplace and prevent occupational risks.
- Implement measures to prevent corruption.
- Promote a fair and balanced salary among bank professionals, under equity criteria.
- Promote measures that facilitate personal reconciliation.
- Foster professional development and training to promote equal opportunities.

### 4.2. WITH CUSTOMERS.

For Bankia, customers are the main axis of their activity and the values that the bank represents, and therefore respect for human rights reinforces the relationship of trust with our customers. Bankia hereby undertakes to:

- Facilitate access to all products and services provided by the institution, without there being any type of discrimination based on sex, age, race, disability or of any other nature.
- Guarantee access to financial information in a transparent, easy, clear and accurate manner.
- Design financial products and services suited to the needs of customers.
- Promote and implement policies that make it possible to establish financing and investment criteria with regard to sectors that have an impact on human rights.
- Not finance new operations or projects linked to companies in which there has been a proven continuous and/or premeditated violation of human rights and of which Bankia is aware. Consideration will be given to aspects such as working conditions and respect for freedom of association, job security and discriminatory practices based on sex, race, religion, political opinion or any other kind. This restriction may be reversed when it can be shown that the company has taken the necessary measures to respect human rights.
- Respect confidentiality and the right to privacy and data protection.

### 4.3. WITH SUPPLIERS AND COMMERCIAL PARTNERS.

Suppliers are a key player in the supply chain and the development of the activity, and accordingly, Bankia demands respect and compliance with human rights from all its suppliers. Bankia encourages them to include, in their practices and performance, behaviours that are aligned

with their values and which they transmit to their own value chain. Likewise, this commitment extends to its commercial partners. Bankia hereby undertakes to:

- Demand that suppliers and commercial partners comply with current legislation, especially on labour matters, regardless of the jurisdiction or law that may be applicable to them.
- Promote contracting with suppliers and relations with trading partners that guarantee respect and compliance with human rights in their activity.
- Establish measures to ensure respect for and compliance with Human Rights for suppliers and for commercial partners.
- When it becomes known, collaborate with suppliers that have seriously breached human rights to establish mitigation and compensation measures whenever possible. Bankia shall have no commercial relations with suppliers that do not resolve these breaches.

#### 4.4. WITH SOCIETY.

Bankia aims to protect human rights in both its internal and external relations, with an emphasis on respecting and guaranteeing human rights in the places where Bankia operates. Bankia hereby undertakes to:

- Promote respect for and compliance with human rights within their sphere of influence by participating in accessions, initiatives and projects promoted by public and/or private bodies.
- Contribute, directly and indirectly, to social development and the Sustainable Development Goals, and therefore to the 2030 agenda.
- Promote financial education both for customers and for any interested citizen, to foster financial inclusion.
- Encourage responsible taxation through transparency, compliance with tax obligations and analysis of the tax exposure of operations.
- Adopt measures to prevent public and private corruption in all its forms and modalities.
- Promote cybersecurity and data protection with respect to the entity itself and to third parties.

#### 5. COMPLIANCE GUARANTEES.

Bankia has a series of internal instruments and mechanisms designed to prevent the violation of human rights, such as:

##### Instruments

- Responsible Management Policy.
- Code of Ethics and Conduct.
- Equality and Diversity Plan.

- Occupational Risk Prevention Policy.
  - Remuneration Policy.
  - Data Protection Policy.
  - Fiscal Policy.
  - Framework of credit risk policies, methods and procedures.
  - Investment and Financing Policy.
  - Internal Rules of Conduct in the Securities Markets.
  - Policy on the Prevention of Money Laundering and Terrorist Financing.
  - Environmental Policy.<sup>1</sup>
  - Purchase policy.
  - Responsible marketing code
- Forms of protection.
- Confidential Whistleblower Channel.
  - Customer Service Department (CSD).
  - Customer Service Department.
  - Supplier Portal.
  - Specific rules of conduct for purchasing.

The purpose of these instruments and mechanisms is, among others, to identify possible human rights violations, conduct a due diligence process, train for the prevention, dialogue and redress of the consequences of possible non-compliance with human rights. As well as evaluating and monitoring the implementation and effects of the proposed measures and penalties, all in line with the Code of Ethics and Conduct and within the framework of Bankia's Responsible Management Policy. For these purposes,

- The Board of Directors approves the Policy for the Protection and Respect of Human Rights.
- Dir. Corporate Social Responsibility will be responsible for reviewing the policy, as well as annually monitoring the due diligence process for the Responsible Management Committee and the Appointments and Responsible Management Committee.
- The Delegate for Data Protection, must ensure compliance with Bankia's data protection, privacy and cookies policy, and must regularly inform the competent internal bodies of its compliance.
- Due diligence develops the mechanisms for reviewing and evaluating said policy.
- The progress made in the implementation of this policy will be communicated annually.

## 6. TECHNOLOGICAL SCOPE OF HUMAN RIGHTS.

For Bankia, it is important to provide the bank's activity with the maximum guarantees regarding the acquisition, possession, custody and processing of customer information. For Bankia, protecting the confidentiality of customer information is not only a legal obligation but an ethical one, as it impacts not only their trust, but also directly affects fundamental rights such as data protection and the right to personal and family privacy.

<sup>1</sup> Pending authorisation by the competent body.

Bankia is also aware of the importance of technological innovation in the financial industry and of its current and potential impact on Human Rights, which is taken into account in relation to professionals, customers, suppliers and commercial partners, and society as a whole. For this reason, Bankia has adopted various instruments and mechanisms, such as:

- Data Protection Officer.
- Cookies policy.<sup>2</sup>
- Personal Data Protection Policy.
- Personal Data Management Manual.
- General Regulations on Information Security.
- Information Security Policy.
- Rules for the Use of ICT Resources.

With these instruments and mechanisms, Bankia ensures all those who work with the bank the utmost respect and protection by the entity in the exercise of their fundamental human rights.

### 7. APPROVAL, REVIEW AND SUPERVISION

The human rights respect and protection policy is approved by Bankia's Board of Directors and will be reviewed on an annual basis to adapt it to the future strategy and needs of Bankia's activity.

The Appointments and Responsible Management Committee will oversee the policy. For these purposes, the Corporate Social Responsibility Directorate will issue an annual report on its follow-up.

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<sup>2</sup> Pending authorisation by the competent body.