

# Human Rights Commitment

February 2021



# 1. PURPOSE

AIB is committed to the protection and preservation of human rights. We respect human rights in accordance with internationally accepted standards. Our commitment to human rights is embedded in the culture and values that define our company, and is reflected in our policies and actions toward our customers, employees, suppliers, and the communities and countries where we do business.

This commitment has been shaped by the United Nations Guiding Principles on Business and Human Rights. The purpose of this commitment is fundamental in guiding the organisation in its strategic vision, operations and relationships with stakeholders.

Our Human Rights Commitments operates alongside AIB's Code of Conduct and AIB's Responsible Supplier Code, and are aligned to the commitments laid out in the laws applicable to the jurisdictions in which we operate, the European Convention on Human Rights and for our business in Ireland the EU Charter of Fundamental Rights.

We will also, where practicable, align ourselves to the provisions of international treaties and other internationally accepted declarations and principles intended to protect Human Rights.

We report annually on our approaches to tackling modern slavery in our Modern Slavery Statement.

# 2. OUR PRINCIPLES

AIB does not tolerate corruption, discrimination, harassment, child labour, forced labour, or slavery in any form. We are committed to an inclusive, safe and ethical workplace as demonstrated within our Code of Conduct and this Human Rights Commitment.

The health, safety and wellbeing of employees is of paramount importance to AIB. Safe working is an integral part of our culture, our purpose, our sustainability and is central to our business plans. We are committed to ensuring the safety of our employees, customers, contractors, visitors and our workplaces (including home workplaces).

AIB's purpose is to back our customers to achieve their dreams and ambitions. We challenge ourselves to always make decisions based on the right thing to do for our customers, always treating our customers fairly and with respect. We do so with competence, honesty and reliability.

We have set out the minimum standards we expect of Suppliers in our Responsible supplier code, and we encourage all suppliers to go beyond these requirements. The term 'Supplier' refers to suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do, or seek to do business with AIB Group.

AIB is committed to conducting all our business activities to the expected standard of professionalism and ethical conduct. We endeavour to support and improve the communities where we operate from an environmental, social and economic perspective.

## 3. OUR COMMITMENTS

### OUR EMPLOYEES

AIB has a Code of Conduct in place which sets out the standard of conduct that supports our values. Our Code applies to all AIB Group employees as well as agency staff and contractors (or those providing outsourced services to the bank).

It explains what we expect of each other and what others expect of us in terms of our behaviours which includes ethics, fairness, respect & accountability. It also covers responsibilities including adherence to procedures, professionalism, training, confidentiality, maintaining personal financial and tax affairs and reporting wrong-doing. AIB also makes the following commitments in respect to human rights of employees:

- Respect the human rights of employees and to comply with all relevant legislation, regulations and directives in the countries and communities in which we operate;
- Commit to treat all employees fairly and not discriminate in hiring, compensation, access to training, promotion, termination or retirement on the grounds of gender, marital status, family status, age disability, sexual orientation, race, religion; or on any other grounds where discrimination is prohibited under local law (for example, membership of the Traveller Community in Ireland);
- Ensure that no child and forced labour will take place;
- Commit to providing safe, secure and healthy working conditions, and to comply with all relevant health and safety laws and regulations applicable to our locations (including home workplaces), and to operate in a manner that is safe;
- Recognise our colleagues right to freedom of association and to participate constructively in dialogue with trade unions;
- Protect and ensure the responsible use of data and the right to privacy;
- Focus on helping employees work-life balance, including the right to disconnect;
- Respecting and promoting diversity and inclusion and effective equal opportunities as laid out in our Diversity & Inclusion Code;
- Ensure employees' working hours and pay rates comply with national laws and industry standards;
- Ensure that employees' total worked hours shall not exceed the maximum allowable under local legislation;
- Ensure all employees' overtime is voluntary and compensated in accordance with applicable laws.

## OUR CUSTOMERS

AIB's Code of Conduct outlines the key behaviours expected when dealing with customers including being transparent in our communications and information, avoid misleading or exerting undue pressure in interactions, providing professional advice by appropriately qualified employees and treating our customers with fairness, respect and understanding at all times.

AIB also makes the following commitments in respect to human rights of customers:

- Ensure non-discrimination among our customers due to gender, marital status, family status, age disability, sexual orientation, race, religion; or on any other grounds where discrimination is prohibited under local law (for example, membership of the Traveller Community in Ireland);
- Avoid causing, financing or contributing to any business activity that is known to breach human rights or fair practices, including taking steps to address any situations we become aware of where this has occurred;
- Ensure that the organisation has an adequate knowledge of its customers, thus mitigating the risk of generating negative impacts on human rights caused by its products and/or services;
- Endeavour to always do the best for our customers first time, and where errors are made, to handle them and all complaints speedily, efficiently and fairly, according to the agreed procedures;
- Commit to providing customers with serviceable, safe and secure banking locations, and to comply with all relevant health and safety laws and regulations applicable to the location, and to operate in a manner that is safe;
- Support and protect our customers in vulnerable circumstances;
- Respect the privacy of our data subjects (i.e. our customers) and treat their information with appropriate confidentiality. Never access or disclose data subject or confidential information unless properly authorised or where the law requires us to;
- Avoid situations which may result in conflicts of interests, and never access or process any banking transaction either for ourselves or for a person with whom we have a personal relationship and do not give, offer or accept any gift/benefit or hospitality which may compromise our customers, the bank, or ourselves;
- AIB will not provide term finance and/or Corporate Finance advisory services to customers who are deemed to engage in a defined list of Excluded Business Activities, which we believe cause irreversible environmental and/or social harm to society and our communities.

## OUR SUPPLIERS

AIB aims to respect and promote human rights in its relations with suppliers through the Responsible Supplier Code which outlines the expectations and principles that all AIB's suppliers should meet when carrying out their business activity.

We expect our suppliers to be committed to acting ethically and with integrity in all their business dealings and relationships, and to implement and enforce effective systems and controls to ensure modern slavery or human rights abuses are not taking place in their businesses and supply chains. The core human rights commitments expected of suppliers are outlined below:

- Respect the human rights of employees and to comply with all relevant legislation, regulations and directives in the countries and communities in which Suppliers operate;
- Prohibit forced labour and human trafficking in supply chains & prohibit the use of child labour;
- Provide clear and uniformly applied disciplinary and grievance procedures including prohibiting mental, physical or verbal abuse;
- Respect the rights of employees to join or refrain from joining worker organisations and will allow workplace access for such organisations to facilitate their representative functions;
- Ensure employees' working hours and pay rates comply with national laws and industry standards;
- Ensure that employees' total worked hours shall not exceed the maximum allowable under local legislation;
- Ensure all employees' overtime is voluntary and compensated in accordance with applicable laws;
- Commit to providing employees with serviceable, safe, secure and healthy working conditions, and to comply with all relevant health and safety laws and regulations applicable to their location, and to operate in a manner that is safe;
- Uphold responsible business practices throughout their own supply chain by encouraging the same of their next level suppliers;
- Commit to treat all employees fairly and not discriminate on the grounds of gender, marital status, family status, age disability, sexual orientation, race, religion; or on any other grounds where discrimination is prohibited under local law (for example, membership of the Traveller Community in Ireland);
- Act honestly, ethically and with integrity in all business transactions and activities;
- Provide a mechanism for confidential reporting of concerns about misconduct or unethical behaviour and provide an appropriate means for addressing any issues identified, while protecting whistle-blowers from any negative repercussions;
- Undertake all business activities with care for the environment and at a minimum will comply with all applicable environmental laws and regulations. AIB expect suppliers to understand and measure their organisation's environmental impact and put in place plans to reduce these impacts.

## OUR COMMUNITIES

- Avoid causing, financing or contributing to any business activity that is known to breach human rights or fair practices, including taking steps to address any situations we become aware of where this has occurred.
- Maintain high standards of physical, information, and digital security.
- Ensure we don't abuse our position or influence others by virtue of our position in any of our markets to gain unfair advantage.
- Advance responsible business practices such as supporting the transition to a low-carbon economies.
- Refrain from dealing with businesses which we have reason to believe are acting illegally.
- Maintain vigilance to indications of fraud, money laundering and other financial crime, and report them promptly.
- Avoid engagement in any form of bribery, corruption, collusive or anti-competitive discussions or agreements and we don't deal with any organisations that do

## SUPPORTING POLICIES & INFORMATION

The Human Rights Commitment & Code of Conduct is a framework supported by a number of key policies and processes listed below. These can also be found on the AIB Group intranet site [here](#)

Note some Business Segments have local policies and procedures which support and expand on the relevant Group Policies, and which should also be referred to as required.

Employees	Customers	Suppliers	Society
<ul style="list-style-type: none"> <li>• Anti-bullying and Harassment</li> <li>• Organisation of Working Time Acts</li> <li>• Annual leave</li> <li>• Absence management</li> <li>• Conduct of personal financial affairs by staff</li> <li>• Expenses</li> <li>• Diversity &amp; Inclusion</li> <li>• Disciplinary</li> <li>• Grievance</li> <li>• Social Media</li> <li>• Group Dealing Code</li> <li>• Aspire Performance Management</li> </ul>	<ul style="list-style-type: none"> <li>• Conflicts of Interests</li> <li>• Information Security</li> <li>• Data Protection Policy</li> <li>• Anti-Bribery and Corruption</li> </ul>	<ul style="list-style-type: none"> <li>• Responsible Supplier Code</li> </ul>	<ul style="list-style-type: none"> <li>• Regulatory compliance</li> <li>• Group Regulatory Compliance Risk Management Framework</li> <li>• Regulatory Compliance Risk Management Policy</li> <li>• Fraud Prevention</li> <li>• Anti-Money Laundering</li> <li>• People, Property &amp; Protection Policy</li> <li>• Internet Gambling Policy</li> <li>• Sanctions</li> <li>• Information Security</li> </ul>
AIB SPEAK UP POLICY – for Raising a matter of Concern			

## 4. OUR APPROACH

### DUE DILIGENCE IN HUMAN RIGHTS

Our Human Rights Commitment defines the fundamentals of behaviour regarding human rights applicable to AIB Group and its employees, customers, suppliers and society.

AIB commits to undertaking a Due Diligence assessment to ensure that the commitments outlined are being lived and met across all of our stakeholder groups. This includes:

#### *Identification of impacts*

To establish mechanisms to identify and prioritise the real and potential adverse impacts on human rights

#### *Due diligence*

To ensure due diligence in respecting human rights, to avoid causing, contributing or being directly linked to adverse impacts on human rights

#### *Dialogue*

To establish processes of dialogue with stakeholders aimed at identifying, assessing, preventing, mitigating and compensating grievances; in such a way that ensures that learning and improvement continue in this regard

#### *Reparation*

To compensate or cooperate in the effective compensation for any adverse impact for which AIB is directly responsible. To ensure legitimate processes of inquiry and complaint.

#### *Strengthening capacities and training*

To strengthen the internal capacities for managing human rights through training and processes

## 5. DIALOGUE AND MECHANISMS

### FOR CLAIMS AND COMPENSATION

AIB will continue reviewing and strengthening engagement with stakeholders to increase the learning & understanding of the challenges the Group is facing as the business evolves.

Grievance mechanisms are a fundamental part to guarantee due diligence in human rights.

AIB has several mechanisms that allow stakeholders to raise inquiries, complaints and claims, such as:

#### *Speak Up / Whistleblowing (Employees & Suppliers)*

Every organisation faces the risk that something will go wrong either accidentally or otherwise. It is very important that we hear about such things, at an early stage, so we can fix them. Our process is outlined in our Speak-Up Policy and what protection will be provided.

Confidential advice can also be sought from our dedicated internal Speak Up team and / or Protect our independent external third party advisors.

#### *Grievance Process*

If an employee feels they have been personally mistreated or have been subject to behaviours which are contrary to the Code of Conduct, concerns can be raised either informally with their People Leader or more formally through the bank's grievance process.

#### *Customer Complaints*

In all our jurisdictions we operate a comprehensive customer complaints process, which is designed to provide our customers with the opportunity to be heard, have the concerns investigated, and make good where needed. It is also designed for us to learn and improve from our mistakes. We make every effort to consider individual customer circumstances as part of any resolution to any customer complaints and we seek support to ensure we always provide the best possible outcome for our customers. We will follow the timelines and steps set out in these processes, whether determined by regulatory codes or internal best practices.



## 6. GOVERNANCE AND MONITORING

The Human Rights Commitment has been approved by our Executive Committee and CEO and reviewed by our Sustainability Business Advisory Committee and Board.

An annual report will be provided to the Board on any aspects for review, and any breaches which have been identified and action taken.

The governance model is structured to the AIB control model, composed of three lines of defence who monitor and govern compliance with the policies that support these commitments.

The responsibility of fulfilling this commitment day in and day out belongs to all people employed by the Group. The responsibility for the design, implementation and improvement of our Commitment to Human Rights is overseen by our Sustainability Team.

<b>Policy Implementation Date:</b>	26 <sup>th</sup> February 2021
<b>Last Review Date:</b>	26 <sup>th</sup> February 2021
<b>Policy Owned By:</b>	Chief Sustainability Officer
<b>ExCo Policy Sponsor:</b>	Director of Corporate Affairs, Strategy & Sustainability
<b>Approval Authority for Material Changes:</b>	AIB Group Board