



BANCO SABADELL GROUP HUMAN RIGHTS POLICY

This document is a translation of a Spanish language document which was approved by the Board of Directors of Banco de Sabadell, S.A. on 30/11/2023. The Spanish version of this document will prevail in the event of any discrepancy or dispute.

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1. Introduction

This document defines the Human Rights Policy of Banco Sabadell Group (hereinafter, “the Group”) applicable in the performance of its activities, respecting and ensuring respect for human rights in its internal and external relationships by undertaking the commitments set forth in the highest internationally recognised standards.

Respect for human rights is an integral part of Banco Sabadell Group’s values and a standard for the legitimate development of its business activity in all regions where it operates, while each geography has laws and case-law that ensure the fulfilment of these rights.

This Policy aims to set out the Group’s commitment to respect, support and protect human rights in the performance of its activities, on the premise that human rights are standards that embrace and protect the dignity of all individuals, governing how they live in society and relate to each other. These rights are also considered in the Group’s relations with the various stakeholders within the environment in which it operates, specifically, its employees, customers, suppliers and other commercial partners, as well as the wider environment with which it interacts.

To that end, the commitment of Banco Sabadell Group is based on, among other things, the Universal Declaration of Human Rights, the ten principles of the United Nations Global Compact, the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization, the Equator Principles, as well as the United Nations’ Principles for Responsible Banking and Principles for Responsible Investment.

In addition to the commitments subscribed at national and international level, which are set out in detail in section 1.4 of this Policy, the Group has developed a Sustainable Finance Plan, which consists of four fundamental pillars of action, including, in particular, that of seeking “to contribute to the transition towards a sustainable society” and, in so doing, to a fairer and more equitable society, in clear support of the key human rights that underpin it.

1.1 Regulatory framework

As a financial institution, Banco Sabadell Group is subject to the regulatory and supervisory standards in force with regard to human rights, at national and international level. At the time of approval of this Policy, these were:

- The **Universal Declaration of Human Rights**, adopted by the United Nations General Assembly on 10 December 1948
- The **Convention for the Protection of Human Rights and Fundamental Freedoms**
- The **International Convention on the Rights of the Child**
- The **International Convention on the Elimination of All Forms of Racial Discrimination**
- The **International Convention on the Elimination of All Forms of Discrimination Against Women**
- The **Convention on the Rights of Persons with Disabilities**
- The **Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment**
- The **European Social Charter**
- The **Charter of Fundamental Rights** of the European Union
- **Regulation (EU) 2016/679 of the European Parliament and of the Council** on the protection of natural persons with regard to the processing of personal data and on the free movement of such

data, repealing Directive 95/46/EC, of April 2016

- **Law 11/2018, of 28 December**, which amends the Code of Commerce, the revised text of the Capital Companies Act approved by Royal Legislative Decree 1/2010, of 2 July, and Law 22/2015, of 20 July, on Auditing of Accounts, in matters of non-financial disclosures and diversity (hereinafter, Law 11/2018 on non-financial disclosures and diversity), which transposes Directive 2014/95/EU of the European Parliament and of the Council amending Directive 2013/34/EU with regard to the disclosure of non-financial information and information on diversity by certain large corporations
- **General Law on Rights of Persons with Disabilities (LGD)** (Royal Legislative Decree 1/2013)
- The **Spanish Constitution** (Part I – On fundamental rights and duties)

1.1.1 National and international initiatives and commitments

Banco Sabadell Group is committed to respecting all internationally recognised human rights and those set forth in the following initiatives and commitments, by performing its activity in accordance with the highest standards of ethics and professional conduct:

- The **International Charter on Human Rights of the United Nations**, which includes: the Universal Declaration of Human Rights adopted by the General Assembly of the United Nations, and the International Covenant on Economic, Social and Cultural Rights
- The **Declaration of the International Labour Organization (ILO)** related to Fundamental Principles and Rights at Work and the eight core conventions identified therein
- **The International Pact on Civil and Political Rights**
- **The OECD Guidelines for Multinational Enterprises**
- The **United Nations Global Compact**, subscribed by the Bank in February 2005, with regard to human rights, labour, the environment and anti-corruption
- The **United Nations Principles for Responsible Investment (UN-PRI)**, subscribed by various investees and subsidiaries of the Bank
- The **Principles for Responsible Banking under the United Nations Environment Programme Finance Initiative (UNEP-FI)**, of which it has been a founding partner since 2019), having made a commitment to strategically align its business with the Sustainable Development Goals
- **The 2030 Agenda for Sustainable Development**
- The **Equator Principles** (2011 signatory) of the International Finance Corporation
- The Adecco Foundation and the CEOE Foundation's **"CEO por la diversidad"** initiative (became a signatory in 2019)

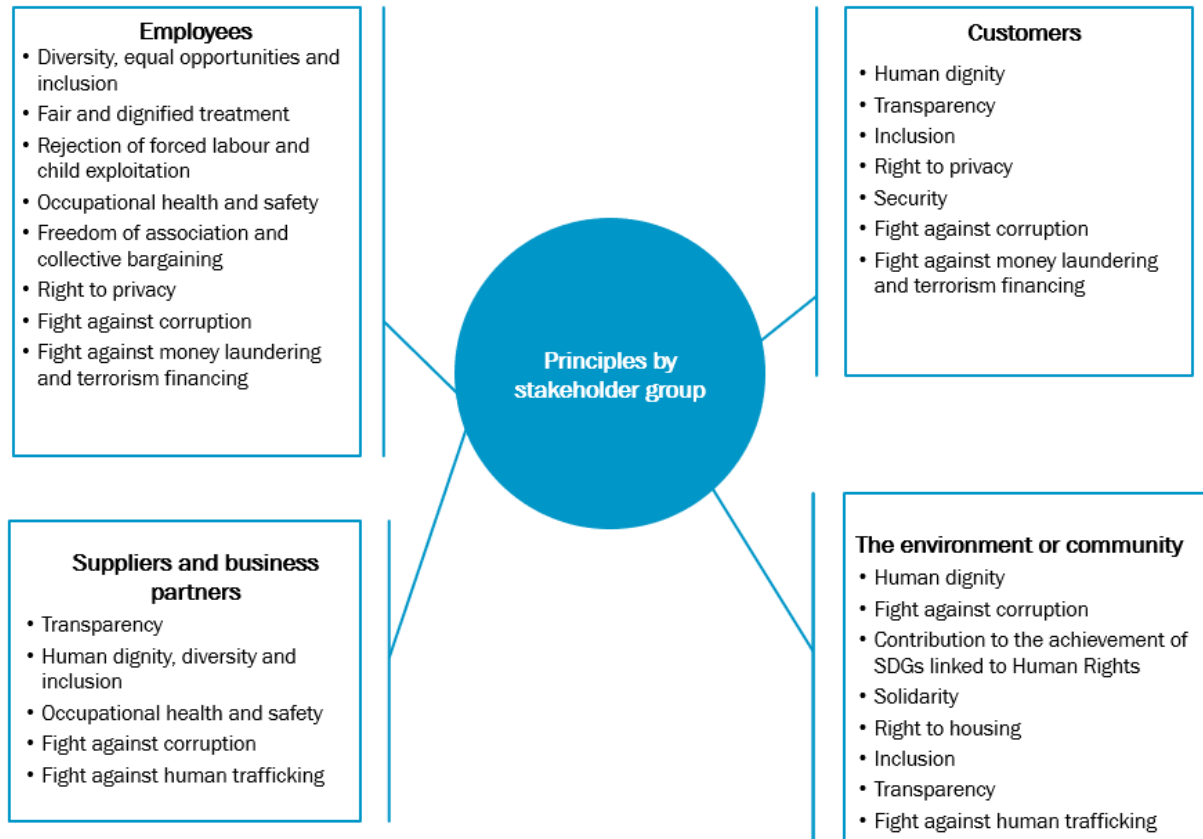
2. Principles and management parameters

2.1 Principles

Through this Policy, Banco Sabadell Group defines a series of principles with the objective of supporting and respecting the protection of internationally recognised human rights within its sphere of influence and, to that end, takes into consideration the Group's relationship with its different **stakeholders**: employees, customers, suppliers and the communities or environment in which it carries out its business and activities.

The **principles that govern this Policy for each of these stakeholder groups** are as follows:

Figure 1. Principles by stakeholder group



2.1.1 With regard to its employees:

- **Diversity, equal opportunities and inclusion**

The Group promotes diversity and equal opportunities, both among its **staff** and within the Board of Directors of its parent company and its subsidiaries.

Furthermore, the Group promotes the **labour market integration** of people with disabilities, by hiring them, either directly or through partnerships with leading firms specialised in the field, thereby removing potential for discrimination in the workplace, and generating a **level playing field**.

On the other hand, and to ensure maximum **equal opportunities** in the professional environment, the Group promotes flexible work practices that allow employees to achieve a balance between their work and their home life and personal and family circumstances.

In this regard, the 3rd Plan for Effective Equality between Women and Men of Banco de Sabadell, S.A., Sabadell Consumer Finance, S.A. and Business Services for Operational Support, S.A., which sets out the objectives for promoting diversity within the organisation for the period 2022-2025, was signed in February 2022, in continuation with the Agreement-Plan on Effective Equability between Women and Men at Banco Sabadell, signed on 2 June 2016.

- **Fair and dignified treatment**

The Group treats **its employees** with respect, recognising their dignity and their fundamental values, ensuring that no one is subject to discrimination on the grounds of their gender, race, age, civil status, ethnic origin, nationality, religion, sexual orientation, political opinion, disability or any other circumstance; in line with the principles, obligations and duties set forth in the BANCO SABADELL

GROUP CODE OF CONDUCT. In this vein, no form of harassment, abuse, intimidation or violence towards staff, be it sexual, physical or mental, is tolerated.

The Group promotes fair treatment in the internal selection, management, promotion, remuneration and development **of its workforce**, encouraging competitive **remuneration** in accordance with the Group's REMUNERATION POLICY, and the **professional promotion** of all those working in it, based on meritocratic criteria, by favouring the attraction, development and retention of talent and offering training to cover different profiles and groups.

- **Rejection of forced labour and child exploitation**

Banco Sabadell Group rejects all forms of forced labour and child labour, thus respecting the provisions of the International Labour Organization (ILO) Conventions and the established minimum legal working age.

- **Occupational health and safety**

The Group is committed to promoting the health and safety of its staff in the workplace, providing them with all the applicable preventive measures with regard to safety and prevention of occupational risks, and ensuring that they perform their duties in the necessary safe conditions.

All employees must follow the published health and safety rules, and it is one of the Group's objectives to promote their well-being, through the continuous improvement of work conditions and of the physical facilities, ensuring a decent work environment in the physical and digital spheres.

- **Freedom of association and collective bargaining**

The Group respects and guarantees the basic rights of its **employees** to form trade unions or other representative bodies, and to join them, as well as their right to freedom of expression.

It also guarantees the basic right of collective bargaining for all of its employees, in accordance with the applicable law in force in the countries in which it operates.

- **Right to privacy**

The Group respects the right of data privacy and, to that end, promotes practices that ensure compliance with the regulations governing the use of personal and digital data to guarantee the right of privacy of its **employees**.

- **Fight against corruption**

The Group is firmly committed to conduct its business in a manner that respects ethical standards and regulations and, in particular, reaffirms its commitment to fight against corruption in all its forms, including extortion and bribery, as set forth in the BANCO SABADELL GROUP ANTI-CORRUPTION POLICY, supported by, among other measures, the adoption of a specific anti-corruption programme which forms part of the Corporate Crime Prevention Programme implemented in each of the corresponding Group companies, as well as training and awareness-raising programmes for its **employees**.

- **Fight against money laundering and terrorism financing**

In carrying out their duties, employees of Banco Sabadell Group are committed to working to combat money laundering and terrorism financing, in accordance with the policy specifically developed in that regard by the Group, namely, the BANCO SABADELL GROUP ANTI-MONEY LAUNDERING AND COUNTER TERRORIST FINANCING POLICY; they are also committed to prohibiting certain transactions with entities or individuals affected by sanctions or restrictive measures introduced and legally enforceable by any national or international body, in consonance with the Group's culture of regulatory compliance, which is supported by, among other things, the annual AML&CTF training plan delivered to employees.

2.1.2 In relation to its customers:

- **Human dignity**

The Group acts with respect and diligence towards its **customers**, recognising their dignity and their fundamental values, and ensuring that no one is subject to discrimination on the grounds of their gender, race, age, civil status, ethnic origin, nationality, religion, sexual orientation, political opinion, disability or any other circumstance; in line with the principles, obligations and duties set forth in the BANCO SABADELL GROUP CODE OF CONDUCT.

- **Transparency**

The Group promotes transparency of information and responsible communication with regard to its **financial products and/or services**, adapting them to the needs and circumstances of its **customers** and facilitating the customer's understanding of their terms and conditions, risks and costs, thus promoting clear, balanced and transparent communication around those products and services.

The Group seeks to respect the commitments it makes to its customers, informing them in good time of any change to verbal and/or written agreements, promoting transparency and integrity in its professional relationships.

- **Inclusion**

The Group promotes inclusion among its **customers**, offering products and services that contribute to a positive social impact through responsible business, as is the case with its social housing management and **financial inclusion** activities, through digitisation and financial education programmes.

It is also committed to the CODE OF GOOD BANKING PRACTICE, aimed at limiting the effects of potential over-indebtedness, thus promoting the financial inclusion of borrowers at risk of social exclusion.

In addition, with the aim of addressing issues related to housing and potential social exclusion, a social rental management model has been developed, through which, the Group seeks to address housing problems and improve the socio-economic situation of its **vulnerable mortgage customers**.

- **Right to privacy**

The Group ensures compliance with the regulations governing the use and processing of personal data in all geographies in which it operates, with the aim of guaranteeing the right of data protection, the privacy of **its customers** and the confidentiality of their data. This includes the data of persons who are not customers and with whom the Group has professional dealings, which the Group may have access to, at any given time, in the performance of its activity.

- **Security**

The Group respects the legislation in force with regard to security, one particular objective being the continuous improvement of its physical facilities, whilst developing measures to safeguard physical, banking, IT and digital security in order to guarantee its customers' right to security, as reflected in the BANCO SABADELL GROUP INFORMATION SYSTEMS SECURITY POLICY.

- **Fight against corruption**

The Group is committed to fighting against corruption, of any kind or form, including extortion and bribery, a commitment explicitly stated through the signature of the ten principles of the United Nations Global Compact, and set forth in the BANCO SABADELL GROUP ANTI-CORRUPTION POLICY.

- **Fight against money laundering and terrorism financing**

Banco Sabadell Group is committed to this fight and, in this respect, in all of its operations with its **customers**, complies with the obligations in force with regard to the prevention of money laundering and terrorism financing, as set forth in the BANCO SABADELL GROUP ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING POLICY, and restricts certain operations with countries and persons that are subject to international sanctions.

2.1.3 In relation to suppliers or other commercial partners:

- **Transparency**

In the supplier **tendering** process, the Group facilitates maximum transparency, providing all participants with reliable information and giving opportunities to alternative suppliers; tenders are conducted in accordance with the BANCO SABADELL GROUP CODE OF CONDUCT, available on the Group website and therefore accessible to the public, together with the CODE OF CONDUCT FOR BANCO SABADELL GROUP SUPPLIERS, thus ensuring that it can be consulted at any time in the process by suppliers.

In addition, **commercial relationships** between Banco Sabadell Group and suppliers under contract must be totally transparent, in accordance with the stipulations of the related policy.

- **Human dignity, diversity and inclusion**

Banco Sabadell Group requires its suppliers to be committed to socially responsible practices and to respect human rights in the performance of their business activity, including respect for the dignity of persons and their fundamental values, rejecting any form of forced labour or exploitation, and striving to ensure that its **employees** are hired without any form of discrimination, in an employment environment that promotes diversity and inclusion.

- **Occupational health and safety**

The Group seeks to ensure that its suppliers hire their own **workers** in compliance with the current labour legislation in force, striving to achieve a healthy and secure work environment, observing the labour conventions and other legal provisions in that regard, and ensuring a workplace free of harassment, abuse, intimidation or violence.

- **Fight against corruption**

The Group seeks to ensure that the conduct of its **contracted suppliers** entails absolute rejection of any form of corruption, including extortion and bribery, in all geographies, thereby reaffirming its commitment in this regard to all of its stakeholders, which is explicitly stated through its signature of the ten principles of the United Nations Global Compact, and set forth in the BANCO SABADELL GROUP ANTI-CORRUPTION POLICY.

- **Fight against human trafficking**

The Group always acts, *vis-à-vis* its **contracted suppliers**, in absolute rejection of any practice related to human trafficking, defined by the United Nations as the process by which an individual is subjected to, and maintained in, a situation of exploitation for financial gain.

2.1.4 In relation to the environment or community in which Banco Sabadell Group operates:

- **Human dignity**

The Group acts with respect for **people**, taking into consideration their dignity and their fundamental values, and it promotes an environment of strict respect, defence and promotion of the internationally recognised human rights in the communities in which it is present.

- **Fight against corruption**

The Group prohibits any corrupt conduct or practice or, indeed, any form of corruption, expressly prohibiting any activity of this kind, as set forth in the BANCO SABADELL GROUP ANTI-CORRUPTION POLICY.

As a signatory of the ten principles of the United Nations Global Compact, the Group explicitly undertakes to fight against corruption in all its different forms, including extortion and bribery, prohibiting any behaviour of that kind in any contact that the Group may have with its surrounding community, in all geographies in which it is present.

- **Fight against human trafficking**

The Group always promotes among the community in which it operates, through social impact initiatives, volunteering programmes and collaboration agreements with NGOs and other social entities, absolute rejection of any practice related to human trafficking, defined by the United Nations as the process by which an individual is subjected to, and maintained in, a situation of exploitation for financial gain.

- **Contribute to the attainment of the United Nations' Sustainable Development Goals (SDGs) linked to fundamental human rights**

As part of its commitment to the attainment of the SDGs defined in its strategy, the Group contributes to producing a positive impact on the related fundamental human rights, through the development of programmes and initiatives, such as **quality education (SDG 4)**, the **eradication of poverty (SDG 1)**, **good health and well-being (SDG 3)**, **decent work and economic growth (SDG 8)**, **gender equality (SDG 5)** or the **reduction of inequalities (SDG 10)**.

- **Solidarity and charitable causes**

The Group is committed to the development of the societies in which it is present and collaborates in a wide variety of charitable projects through direct donations, taking into consideration the limits established in the BANCO SABADELL GROUP ANTI-CORRUPTION POLICY, and/or corporate volunteering activities carried out by its employees, to the benefit of multiple initiatives targeting those most in need, and bringing into play the necessary resources to achieve progress in social development, within its sphere of influence.

- **Right to housing**

The Group promotes, as far as possible, practices that contribute to addressing issues related to housing and social exclusion in the most disadvantaged social groups,

facilitating the use of real estate assets by non-profit institutions and foundations that offer support to the most vulnerable or at-risk social groups.

- **Inclusion**

The Group promotes inclusion among all of its stakeholders, including **society** in general.

To that end, it promotes and participates in financial education programmes, focusing on groups of people who are socially excluded, and collaborates in projects specifically geared towards their integration in the labour market.

- **Transparency**

Through the various communication channels at its disposal, the Group provides **analysts, investors**

and/or shareholders with comprehensive economic and financial information that is clear and accurate and that faithfully reflects its real accounting and balance sheet situation, in accordance with generally accepted accounting principles and the applicable international financial reporting standards.

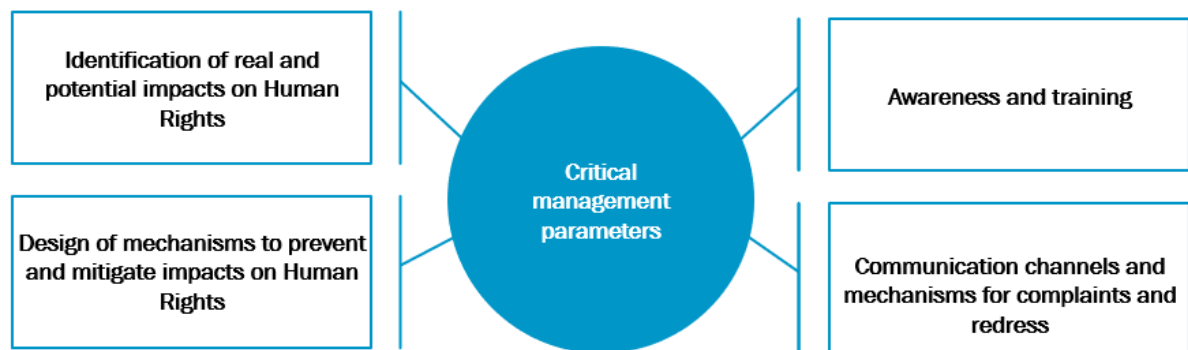
The **publication of its financial data and reports on financial results**, available on the corporate website, is entirely based on the principles of reporting transparency, in accordance with the legislation in force.

2.2 Management parameters

The Group incorporates its commitment to uphold and respect human rights in its strategy, processes and operating model, such that all of the entities comprising the Group are responsible, within their respective sphere of influence, for compliance with that commitment, with the aim of achieving the goals related to human rights.

In particular, the Group **identifies, prevents and mitigates shortcomings, establishes mechanisms for redress and provides training** on the potential negative impacts of its activities and processes on human rights, especially when granting loans to companies, in the human resources management model and in its supplier contracting processes.

Figure 2. Critical management parameters



2.2.1 Identification of real and potential impacts on human rights among different stakeholder groups

The Group provides **employees** with the appropriate resources to analyse customer needs through research and granting of financing, taking into account aspects such as: the customer's capacity to repay, the prudent relationship between the amount loaned and the value of collateral, or information on product costs; based on this information, funding and investment transactions are analysed under the premise of minimising potential risks of over-indebtedness or other negative impacts related to human rights.

On the other hand, through the **identification** of the rights involved in its human resources management, and seeking to avoid a potential negative impact on its **employees**, Banco Sabadell Group is mindful of equality in its selection, internal recruitment and external hiring processes, ensuring that the employment conditions (working hours, break periods, permits, flexibility, work/life balance, remuneration and social benefits) and security in the workplace comply with the labour regulations in force, and acting in accordance with the principles of human dignity, diversity and inclusion involved in these processes.

In this regard, all of the applicable preventive measures related to safety and occupational risk prevention are made available to **employees**, ensuring that staff have the necessary training in this regard and that they are able to work in conditions of maximum safety and security. All employees must follow the published health and safety rules, and must immediately report any concern, security breach or related incident.

In addition, being aware of the risk of a potential infringement of data and privacy regulations, the Group acts to ensure personal data protection through appropriate management of this information,

and carries out all sales, marketing and advertising of its products and services in such a way as to safeguard the personal information related to **customers** and the **community with which the Group relates and interacts**.

With regard to the identification and control of risks related to corruption, in each corresponding Group company, the Board of Directors, either directly or where applicable through the corresponding Board committee, promotes and supervises the adoption and execution of a specific programme related to the fight against corruption as part of the Corporate Crime Prevention Programme. In addition, as part of its training programme, the Group has a specific course on this subject, which is mandatory for all employees, and also has specific training plans related to the prevention of money laundering and terrorism financing, in accordance with the specific details set out in the BANCO SABADELL GROUP ANTI-CORRUPTION POLICY and in the BANCO SABADELL GROUP ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING POLICY, respectively.

2.2.2 Design of mechanisms to prevent and mitigate impacts on human rights

The Group develops appropriate tools intended to avoid causing, contributing to or being associated with adverse impacts on human rights.

In this regard, the Group requires that **its suppliers** are aware of, respect and formally adhere to the CODE OF CONDUCT FOR SUPPLIERS, which appears in the GROUP POLICY ON OUTSOURCING OF FUNCTIONS and can be consulted by the public on the Group's website. This Code of Conduct determines the fundamental human rights principles that they must respect in the performance of their business activity, which must also embrace best practice in terms of ethical, social and environmental concerns. In this way, it is ensured that the Group's suppliers hire their employees in accordance with the labour legislation in force and international labour conventions, including those of the ILO.

Additionally, the possibility of making revisions is established, as and when considered appropriate, to ensure suppliers' compliance with this Code.

The tendering process for suppliers who apply to maintain a commercial relationship with Banco Sabadell Group, is carried out in accordance with the parameters set forth in the BANCO SABADELL GROUP POLICY ON OUTSOURCING OF FUNCTIONS. Given that outsourcing agreements may generate conflicts of interest between the parties involved, potential conflicts of interest must be identified, assessed and managed so that they may be avoided; such potential conflicts of interest are managed under the criteria and procedures established in the aforesaid policy, which includes specific sections on their management.

Additionally, Banco Sabadell Group promotes its financing and investment products with a focus on the most vulnerable social groups, so that they are not discriminated by the available commercial offer, and it develops and designs environmental and/or social products and services with the aim of fostering social and financial inclusion, and to ensure responsible lending. Furthermore, seeking to protect **users of financial services**, it is strengthening the procedures for gathering information on them, as well as the assessment of the solvency of borrowers.

Lastly, the Group promotes the utmost transparency for **customers** in the dissemination of information on products and/or services forming part of its commercial offer, adopting responsible communication practices that avoid manipulation of information, offering all the necessary and relevant information for appropriate decision-making, warning the customer of the risks and the applicable costs and fees, and protecting their integrity, in accordance with the recommendations of the Code of Good Governance of Listed Companies of the Spanish National Securities Market Commission (CNMV).

Access to **customer data** by regulated entities is justified on grounds covered by the data protection regulations, and commercial use of such data is carried out, when necessary, in an environment that ensures the privacy of conversations and of the documentation used.

The Group is engaged in helping to resolve problems existing in the **local communities in which it operates**. Thus, with regard to the **vulnerable mortgage customer** group, the parent company is engaged in ongoing social housing issues, working to grant affordable social rentals that avoid the

possibility of social exclusion, and facilitating an improvement to the socio-economic situation of this group through a complementary support service that facilitates their integration in the labour market. For the other geographies in which the Group is present, such as the subsidiary in the UK or the company in Mexico, the involvement in charitable causes and initiatives is noteworthy, being mainly focused on supporting **people** in their respective geographical environments who are in a particularly difficult situation or who are especially vulnerable.

The Group will abstain from participation in financing transactions that are directly related to anti-personnel mines and/or cluster bombs, due to their particular impact on the right to life and human integrity, particularly that of the **civil population**, and will refrain from establishing trade relations related to so-called “controversial weapons” and/or with “countries subject to an arms embargo”, according to the definitions of these terms set out in existing United Nations treaties and conventions, and as defined in the DEFENCE SECTOR POLICY.

In 2011, the Group signed the Equator Principles, the reference framework at international level for the assessment and management of potential environmental and social risks, including those related to breaches of human rights. Based on those principles, the Group identifies risks related to human rights in its commercial transactions involving **financing for and/or investment in** companies and/or projects, as well as corporate loans.

With regard to **employees** as a collective, the Group has established selection, management, promotion, remuneration and career development procedures in its human resources plans (remuneration policy, equality plans, etc.), ensuring respect for diversity, equal opportunities, meritocracy and non-discrimination on any grounds, in line with fundamental rules contained in its Code of Conduct, and with the provisions of the General Disability Law applicable throughout the Kingdom of Spain. In accordance with the provisions of that Law, seeking to ensure non-discrimination in the labour market integration of **people with disabilities**, it promotes a level playing field, by hiring such people, either directly or through partnerships with leading firms in this field.

Furthermore, the Group acts proactively to prevent, manage and mitigate risk arising from potential work-related accidents, strengthening measures if external circumstances (epidemics, pandemics, etc.) so require, with the aim of ensuring the health and safety of **employees** in the performance of their duties and tasks, also taking into account psycho-social factors related to occupational stress and mental health among the staff.

In relation to the same collective, as part of its explicit commitment to fight against any form of corruption, in addition to strict compliance with existing regulations, Banco Sabadell Group has a GROUP ANTI-CORRUPTION POLICY applicable to all employees, in addition to the CODE OF CONDUCT, and the Group Policies on CONFLICTS OF INTEREST, CORPORATE CRIME PREVENTION and ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING.

In this regard, Banco Sabadell Group pays particular attention to the accounts of political parties and persons with public or related institutional responsibilities, by monitoring the donations and contributions that they may receive from third parties, while the Group itself abstains from making any such contribution to those groups. With regard to donations made to non-governmental organisations and/or foundations in acts of patronage and/or cooperation, donations are carefully considered and are subject to independent audit by third parties, to avoid any kind of corruption risk, in any form.

In addition, with the aim of avoiding potential conflicts of interest, the acceptance of gifts, advantages or personal benefits, of any kind, either for oneself or on behalf of a third party, from customers and/or suppliers, is limited, as reflected in the Group’s CODE OF CONDUCT and in the Group’s GENERAL POLICY ON CONFLICTS OF INTEREST, with the aim of preventing, identifying, assessing, reporting and managing any potential conflict of interest that such acceptance may generate. Similarly, any conduct

related to the delivery, request, receipt or acceptance of an unjustified benefit or advantage, of any kind, for oneself or for a third-party, in the form of an improper consideration in business relations, will not be tolerated, and all payments and/or charges must correspond to services actually provided, following the established authorisation flows, and must be properly documented and accounted for.

2.2.3 Communication channels and mechanisms for complaints and redress

The Group has established the necessary communication channels to enable dialogue with and participation by its different **stakeholder groups**, so that any incident related to a potential breach of human rights may be investigated. The Group understands that complaints mechanisms are an essential part of safeguarding due diligence in this area. To that end, Banco Sabadell Group has provided, at external and internal level, various mechanisms that allow queries, complaints, conflicts of interest, claims and whistleblowing reports to be put forward by staff, customers, investors and shareholders, and by partners, suppliers and third parties with which it has business relations. The existence of these confidential channels available to employees allows any doubts about the practical application of human rights to be addressed, while potential breaches of the CODE OF CONDUCT can be reported.

The Group reports on aspects related to human rights in the Non-Financial Disclosures Report, in compliance with the general provisions published in Law 11/2018 with regard to non-financial disclosures and diversity, as set out in detail in the BANCO SABADELL GROUP FINANCIAL AND RELATED NON-FINANCIAL DISCLOSURES POLICY.

2.2.4 Awareness and training

Knowledge of human rights and a corresponding culture is promoted in the Group through the requisite related communications, raising awareness among employees of the importance of observing the procedures that have been developed, with the aim of observing human rights with the utmost respect. To that end, the Group collaborates in the development of training actions aimed at the early detection and reporting of any conduct that may potentially breach these international principles, thereby detecting and reducing any such breaches.

In the case of people who, because of their duties, are exposed to a greater risk of potential impact in terms of human rights, as is the case with employees working in areas that manage financing and/or investment projects or corporate loans, or those working in labour relations or data security, among other areas, the Group ensures that they are equipped with specific knowledge in that regard, thereby seeking to ensure the utmost protection and maximum respect for the related human rights in the performance of their business duties.

3. Tools

The Group has a set of tools in place to control the operating procedures derived from this Policy, which include:

- Office automation tools with ESG data that contains indicators related to human rights that comply with Law 11/2018 with regard to non-financial disclosures and diversity.
- The Group's internal and external reporting channels, through which stakeholders (employees, customers, partners, suppliers or third parties) may put forward their queries, complaints, suggestions and claims, and report any breach of the Code of Conduct or any risk or potential incident related to human rights that may have been committed by staff in the performance of their duties, ensuring that the identity of any person reporting such information is kept strictly confidential during the handling of these communications:
 - o The **e-mail** to which **employees concerned** may address any whistleblowing reports related to the **equality plan** in force in each region, specifically, in the event of any potential gender-based discriminatory conduct, in matters related to professional development, equal opportunities and work/life balance, or in the case of sexual harassment, gender-based bullying or workplace bullying.

- The Corporate Ethics Committee electronic mailbox 0901CEC@bancsabadell.com is available to all **employees of the Group**, so that they may raise questions relating to the Code of Conduct or express any concern regarding ethical compliance in their area of work.
- A customer care service, which conforms to, among others, the Regulation for the defence of **customers and financial users of the Group**, and which addresses and resolves their complaints and claims independently from the business and operational lines, with the aim of ensuring its decision-making autonomy, working according to principles of transparency, independence, efficiency, coordination, speed and security.
- **Customers and users** may also appeal to the **Customer Ombudsman** (or analogous entity depending on the geography or type of activity concerned) an independent body of the Group that has the authority to resolve any issues referred to it, both in the first and second instances. Decisions taken by the Customer Care Service or the Ombudsman are binding on all of the Group's subsidiaries.
- The electronic mailboxes InvestorRelations@bancsabadell.com and accionista@bancsabadell.com have been provided as communication tools available to **institutional investors** and **minority shareholders** respectively, and they are managed through the Policy for communications and contact with shareholders, investors and proxy advisors.
- The online platform of the [Whistleblowing Channel](#), available in the corporate website, under “Destacados”, and in IN Sabadell, under “Tu Banco > Nuestro compromiso > Canal de Denuncias” through which, **people who form part of the Group**, whether through employment or because they form part of its governance bodies, under their obligation to report to the organisation any indication of a potential crime or irregularity that involves the conduct of an individual or a group of individuals or that involves any activities carried out by any Group company, including the activities of third parties in the context of their relationship with the Group, such as **suppliers and/or providers of goods and services to the Group**.

4. Policy control

The following controls have been established by the Group:

Sustainability, which publicly reports, through the Non-Financial Disclosures Report, on aspects and indicators related to human rights in the Group, in compliance with the general provisions published in Law 11/2018 with regard to non-financial disclosures and diversity, which is accessible to all of the Group's stakeholders, investors and consumers.

The Corporate Ethics Committee (CEC), which promotes ethical conduct throughout the organisation to ensure compliance with the action principles set forth in the Banco Sabadell Group Code of Conduct, and is the competent body to address communications received through the whistleblowing channel, and any criminal risk or potentially criminal act committed by any employee, partner or third party in their business relations with the Group.

The implementation of various communications resources by Banco Sabadell Group, both external and internal, for all of its stakeholders (employees, customers, investors, shareholders, partners, suppliers or third parties), through which they may submit any query, complaint, suggestion or claim related to human rights in the performance of the Group's activity, which ensures that any misconduct or breach in this regard is brought to the Group's attention, whilst ensuring that the identity of persons reporting such conduct is kept strictly confidential during the handling of these communications.

The performance of assessments of health and safety in the workplace, internal audits, satisfaction surveys of any stakeholder group, or the collection of information (formally or informally, internally or externally, directly or by third parties, be it quantitative or qualitative, in relation to the respect and protection of human rights), are all part of the system for screening, assessment and monitoring in this respect, making it possible to identify the areas that may be affected by negative

impacts.

The results obtained following execution of the control systems described above are monitored and, if necessary, the applicable corrective measures are implemented. The following monitoring mechanisms, among others, are established:

- Through the Non-Financial Disclosures Report, Sustainability seeks to ensure that all aspects and indicators related to human rights in the Group are properly reflected, on an annual basis, in a public document, in compliance with the requirements under the general provisions of Law 11/2018 with regard to non-financial disclosures and diversity.
- The registration, monitoring and resolution of communications received through all of the communication channels, both internal and external, established by Banco Sabadell Group, for all of its stakeholders in all geographies in which it is present, specifically, staff, customers, suppliers, investors, shareholders or third parties with which the Group has a relationship.
- In this way, queries, complaints, whistleblowing reports or claims received are appropriately managed, putting into action the necessary mechanisms for redress or reparations for the victims in the event of any infringement or prejudice in this area, applicable to all of the Group's stakeholders when the Group is directly responsible (formal apology, restitution, financial or non-financial compensation, injunctive relief, etc.). Assessment of the control and management systems provided in this area, as described in the last paragraph of the previous point, which will provide the foundations required to correct the procedures, if necessary, and ensure their effective role in due diligence, as part of a continuous learning process, and to improve the mechanisms and prevent future malfunction, as well as being part of the supervisory and oversight cycle.

5. Document governance

The BANCO SABADELL GROUP HUMAN RIGHTS POLICY is approved by the Board of Directors of Banco Sabadell, which is the highest authority in the approval of the Group's policies, being responsible for establishing the corresponding principles, commitments and objectives.

This Policy shall be available to all employees through CanalBS or through any other channel deemed appropriate by the Group at all times.

