

BIL HUMAN RIGHTS STATEMENT

1 Key Contents

The Human Rights Statement sets out how Banque Internationale à Luxembourg and the entities within BIL Group seek to respect internationally recognised human rights across their own operations and business relationships.

BIL is committed to respecting human rights, avoiding causing or contributing to adverse human rights impacts, and seeking to prevent or mitigate impacts directly linked to its operations, products or services through a business relationship. Where BIL identifies that it has caused or contributed to an adverse impact, BIL is committed to providing for, or cooperating in, appropriate remediation.

BIL complies with applicable laws in the jurisdictions where it operates. Where national law and international human rights standards differ, BIL seeks ways to honour internationally recognised human rights to the greatest extent possible without breaching applicable law.

Commitment towards stakeholders

1.1 Responsibility towards employees

BIL considers respect for the human rights of its employees to be a fundamental responsibility. The Bank is committed to providing a fair, inclusive and respectful workplace and to ensuring that employment-related decisions, including recruitment, promotion, remuneration and professional development, are free from discrimination and based on equal opportunity.

To support this commitment, BIL has established policies, charters and procedures that promote:

- Diversity, inclusion and equal opportunity across the workforce and management bodies;
- Fair and equitable remuneration practices;
- A workplace free from discrimination, harassment, violence and retaliation;
- Respect for privacy and the protection of personal data;
- Freedom of expression, association and collective bargaining, in accordance with applicable laws;
- The prohibition of child labour, forced labour and human trafficking;
- Safe and healthy working conditions, employee well-being and work-life balance;
- Access to training, professional development and career opportunities; and
- Secure and confidential grievance and whistleblowing mechanisms for reporting concerns, including potential human rights violations.

1.2 Responsibility towards clients

BIL is committed to treating all individuals with dignity, fairness and respect. The Bank seeks to build relationships with clients and business partners that are aligned with responsible business conduct and respect for human rights, while recognising that its ability to influence outcomes may vary depending on the nature of the relationship.

To support this commitment, BIL:

- Promotes fair and non-discriminatory access to its products and services.
- Provides reliable, accurate and transparent information about all products and services offered.
- Conducts business fairly, honestly and transparently, with zero tolerance for bribery and corruption.
- Respects and protects the privacy of clients and safeguards personal data in accordance with applicable laws and regulations.
- Maintains mechanisms through which clients may raise concerns or complaints, ensuring that these are considered and addressed in a fair and timely manner.
- Takes reasonable measures to prevent financial exclusion, over-indebtedness and the exploitation of vulnerable clients.
- Integrates human rights considerations into its investment and client due diligence processes and seeks to avoid relationships or activities that may be linked to serious human rights abuses.

Through its responsible investment and onboarding practices, BIL applies a risk-based approach to identifying and mitigating potential adverse impacts associated with human rights, including risks related to forced labour, child labour, human trafficking and other serious human rights violations.

1.3 Responsibility towards suppliers

BIL expects its suppliers and subcontractors to conduct their activities in a manner that respects human rights, labour rights and ethical business practices. The Bank seeks to build relationships with suppliers that share its commitment to responsible business conduct and encourages the promotion of these principles throughout the value chain.

To support this commitment, BIL:

- Incorporates human rights, labour, ethical and sustainability considerations into its procurement and supplier management processes through its Procurement Policy, Third Party Policy and Code of Conduct for Providers.
- Integrates human rights considerations into key stages of the supplier relationship lifecycle, including supplier selection, contracting and ongoing supplier oversight.
- Promotes responsible business practices throughout its value chain, in alignment with internationally recognised standards and principles, including the United Nations Global Compact.

2 Coverage of activities

This Statement, derived from the Group's internal Human Rights Policy, applies across BIL S.A. and BIL Group subsidiaries, branches and representative offices. It applies to employees, members of management and governing bodies, and all functions and activities within the scope

of the BIL Group. The Statement also applies to clients, investees, suppliers, contractors and other business partners.

3 Governance

The Sustainable Development Team of BIL Group is responsible for the development, maintenance and periodic review of this Statement.

The Chief Risk Officer is responsible for the implementation of the Human Rights Statement.

4 Reference to third-party standards or initiatives

The Human Rights Statement is informed by the following internationally recognised standards and its principles:

1. The **International Bill of Human Rights**, comprising the **Universal Declaration of Human Rights** and the principal UN covenants on civil, political, economic, social and cultural rights;
2. The **International Labour Organization Declaration on Fundamental Principles and Rights at Work**;
3. The **United Nations Guiding Principles on Business and Human Rights** (UNGPs);
4. The **OECD Guidelines for Multinational Enterprises on Responsible Business Conduct**;
5. The Ten Principles of the **United Nations Global Compact** (UNGC); and
6. The **United Nations Principles for Responsible Banking** (UNPRB).

These frameworks support rights including equality and non-discrimination; privacy; freedom of thought, expression, association and collective bargaining; just and favourable working conditions; health and safety; and freedom from forced labour, child labour, human trafficking and other forms of exploitation.

By adhering to these principles, BIL is committed to contributing to the Sustainable Development Goals of the UN 2030 Agenda. These goals address global social and environmental challenges and require us to strive to align our strategy and practices towards the vision of the Sustainable Development Goals and the Paris Climate Agreement.

Through its commitment to responsible business conduct, BIL acknowledges and applies the Ten Principles of the UNGC, which are derived from the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption. The Bank also aligns approach with the UNGPs, which provide the global standard for preventing, identifying and addressing adverse human rights impacts linked to business activities.

5 Consideration given to the interests of key stakeholders

Employees, managers and members of the administrative, management and supervisory bodies are expected to uphold the principles set out in this Statement, as well as the commitments reflected in the BIL Code of Ethics and other relevant internal policies and standards.

Human rights considerations are integrated into the Bank's decision-making processes, including the establishment, renewal, expansion and termination of business relationships. BIL commits appropriate resources to the effective implementation of this Statement and promotes awareness through trainings and communication.

The Bank maintains appropriate communication and reporting channels through which employees and external stakeholders may raise concerns or report potential human rights impacts, while ensuring confidentiality and the protection of personal data.

The principles and commitments set out in this Statement are communicated to employees and, where relevant, to suppliers, business partners and other stakeholders.

6 Availability to potentially affected stakeholders

This Statement is publicly available to external stakeholders on BIL's website. For internal stakeholders, the principles and commitments set out in this Statement are reflected in a dedicated Human Rights Policy and is accessible through the Bank's intranet.

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