



BANCO SABADELL GROUP HUMAN RIGHTS POLICY

## CONTENTS

---

1. Introduction .....	3
1.1 Regulatory Framework.....	3
2. Principles and Commitments .....	5
2.2 Management parameters.....	10
3. Implementation.....	14
4. Monitoring, evaluation and control.....	15
5. Document governance.....	15

## 1. Introduction

This document is an extract from the Human Rights Policy of the Banco Sabadell Group (hereinafter, “the Group”), through which the performance of the activities carried out by the Group is defined. It also covers its explicit commitment to the respect, support and protection of human rights in its internal and external relations with all its stakeholders within the environment in which it operates, and for this purpose, assuming the commitments set forth in the highest internationally recognised standards.

For the Banco Sabadell Group, respect for human rights is an integral part of its values, and a standard of action in carrying out its business activity legitimately in each of the companies that make up the Group in the territories in which it is present; all of which are in geographical areas that have laws and jurisprudence to ensure compliance with these rights.

The aim of this policy is to establish the basic principles of action in the field of human rights which the Group uses as a basis and which guide the relationships that the Group establishes with its employees, customers, suppliers and other business partners, as well as the environment in which it operates, and for this purpose, the basis of its commitment, among others, is the Universal Declaration of Human Rights, the Guiding Principles on Business and Human Rights, the ten principles of the United Nations Global Compact, the International Labour Organisation Declaration and the Equator Principles, as well as the United Nations Principles for Responsible Banking and Investment.

This Policy is complemented by the Code of Conduct, the Supplier Code of Conduct and other policies established by the Group, such as the Sustainability Policy, the Outsourcing Policy, the Remuneration Policy, the Anti-Corruption Policy and the Anti-Money Laundering and Countering the Financing of Terrorism Policy, among others.

### 1.1 Regulatory Framework

This document sets out Banco Sabadell’s commitment to human rights and establishes the principles that inspire its responsibility; assuming the application of the content of the main international declarations for this purpose, as well as respect for all internationally recognised rights, which are set forth in the following initiatives and commitments, among which the following can be highlighted:

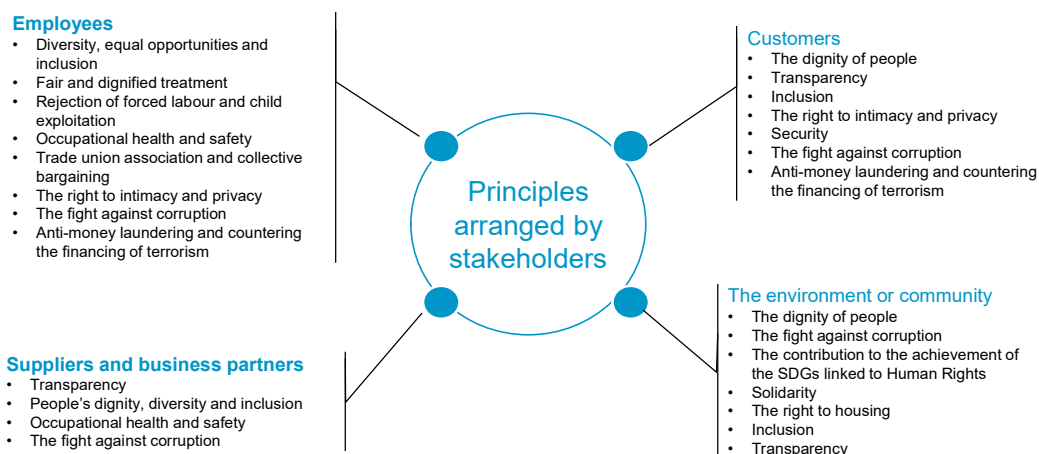
- The **Universal Declaration of Human Rights**, proclaimed by the General Assembly of the United Nations on 10 December 1948
- The **Convention for the Protection of Human Rights and Fundamental Freedoms**
- The **International Convention on the Rights of the Child**
- The **International Convention on the Elimination of All Forms of Racial Discrimination**
- The **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 and its repealing Directive 95/46/EC of April 2016
- **Law 11/2018, of 28 December**, amending the Commercial Code, the consolidated text of the Corporate Enterprises Act approved by Royal Legislative Decree 1/2010, of 2 July, and Law 22/2015, of 20 July, on Auditing of Accounts, on non-financial information and diversity (hereinafter, Law 11/2018 on non-financial information and diversity), which transposes Directive 2014/95/EU of the European Parliament and of the Council amending Directive 2013/34/EU on the disclosure of non-financial information and information on diversity by certain large undertakings and groups
- The **General Disability Act** (LGD in its Spanish initials) (Royal Legislative Decree 1/2013)
- The **Spanish Constitution** (Title I.- Fundamental Rights and Duties)
- **The United Nations International Bill of Human Rights**, comprising the Universal Declaration of Human Rights proclaimed by the United Nations General Assembly, and the International Covenant on Economic, Social and Cultural Rights
- **The International Labour Organisation (ILO) Declaration** on Fundamental Principles and Rights at Work and the eight fundamental conventions identified in it
- **The United Nations Guiding Principles on Business and Human Rights**, adopted in 2011
- **The International Covenant on Civil and Political Rights**
- **The OECD Guidelines for Multinational Enterprises**
- **The United Nations Global Compact**, which the Bank signed in February 2005 in relation to human rights, labour, environment and anti-corruption
- **The United Nations Principles for Socially Responsible Investment** (UN-PRI), which several of the Bank's investees and subsidiaries have adhered to
- **The United Nations Environment Programme Finance Initiative (UNEP-FI) Principles for Responsible Banking**, of which it has been a founding partner since 2019, by committing to strategically align its business with the Sustainable Development Goals
- **The 2030 Agenda for Sustainable Development**
- The International Finance Corporation's **Equator Principles** (Signatory in 2011)
- Initiative promoted by the Adecco Foundation and the Spanish Confederation of Employers' Organisations (CEOE in its Spanish initials) **"CEO for Diversity"** (Signatory in 2019)

## 2. Principles and Commitments

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

Figure 1. Principles arranged by stakeholders



### 2.1.1 In relation to its employees:

- **Diversity, equal opportunities and inclusion**

Diversity and equal opportunities are promoted in the Group, both among **its staff** and within the Board of Directors of its parent company as well as its subsidiaries.

The Group also encourages the **integration** of people with functional diversity in the **workplace**, through direct contracting or through alliances with organisations of good standing specialising in this field, thus eliminating the possibility of discrimination in employment and occupation, and generating **equitable** environments.

Moreover, and in order to ensure **equal opportunities** in the professional environment, the Group promotes flexible working practices that allow its employees to balance their working life with their personal and family circumstances.

- **Fair and dignified treatment**

The Group acts with respect towards **its employees**, considering their dignity and fundamental values, ensuring non-discrimination for any reason of gender, race, age, marital status, ethnic origin, nationality, religion, sexual orientation, political opinion, functional diversity or any other circumstance; aligning itself with the principles, obligations and duties contained in the BANCO SABADELL GROUP CODE OF CONDUCT. In this regard, no form of any possible harassment, abuse, intimidation or violence towards staff, whether sexual, physical or mental, is tolerated.

The Group promotes fair treatment in its internal selection, management, promotion and remuneration processes as well as in the development **of its staff**, which are based on promoting competitive **remuneration** in accordance with the Group's REMUNERATION POLICY, and the **professional promotion** of all the people who work in the group, based on criteria of merit, encouraging the attraction, development and retention of talent through a range of training to be able to cater for the various profiles and groups.

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

The Banco Sabadell Group rejects all forms of forced and child labour, thus respecting the provisions set forth in the International Labour Organisation (ILO) Convention and the established minimum legal working age.

- **Occupational health and safety**

The Group is committed to promoting the health and safety of its employees in the workplace, taking all the applicable preventive measures in the matter of occupational safety and risk prevention available to them, as well as ensuring that they carry out their activities under the necessary safety conditions.

All employees must follow the published health and safety rules, and it is an objective of the Group to promote their well-being by constantly improving working conditions and physical facilities, ensuring a dignified working environment both in the physical facilities as well as online environments.

- **Trade union association and collective bargaining**

The Group respects and guarantees the fundamental right of its **employees** to form and join trade unions or other representative bodies as well as having freedom of opinion.

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

- **The right to intimacy and privacy**

The Group respects the right to intimacy and data privacy and, for this purpose, it promotes practices that ensure compliance with the regulations governing the use of personal and digital data to guarantee its **employees'** right to privacy.

- **The fight against corruption**

The Group is firmly committed to displaying conduct that respects ethical norms and standards and, in particular, ratifies its firm commitment to the fight against corruption in its different forms, including extortion and bribery, as set forth in the BANCO SABADELL GROUP ANTI-CORRUPTION POLICY, supported, among other measures, by the adoption of a specific anti-corruption programme within the Criminal Responsibility Prevention Programme in each of the companies within the Group as applicable, as well as training and awareness programmes for their group of **employees**.

- **Anti-money laundering and countering the financing of terrorism**

In carrying out their activities, the employees of the Banco Sabadell Group are committed to the anti-money laundering and countering the financing of terrorism, in accordance with the policy specifically developed by the Group, the BANCO SABADELL GROUP ANTI-MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM POLICY; as well as the prohibition to perform certain transactions with entities or individuals affected by sanctions or restrictive measures agreed by any

national or international legal enforcement body, in line with the culture of regulatory compliance that characterises the Group, supported, among others, by the annual training plan provided to its employees on this matter.

#### 2.1.2 In relation to its customers:

- **The dignity of people**

The Group acts with respect and diligence towards its **customers**, taking into account their dignity and fundamental values, and ensuring non-discrimination for any reason of gender, race, age, marital status, ethnic origin, nationality, religion, sexual orientation, political opinion, functional diversity, or any other circumstance; aligning itself with the principles, obligations and duties contained in the BANCO SABADELL GROUP CODE OF CONDUCT.

- **Transparency**

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

The Group strives to respect the commitments acquired with its customers, publishing any possible modification in verbal and/or written agreements in good time, promoting transparency in the professional relationship and conducting itself with integrity.

- **Inclusion**

The Group promotes the inclusion of its **customers** by offering products and services that contribute to a positive impact through responsible business, such as social housing management and **financial inclusion**, through digitalisation and financial literacy programmes.

The Bank is also committed to the CODE OF GOOD BANKING PRACTICES, in order to limit the effects of customers over indebtedness and thus enable the financial inclusion of debtors at risk of social exclusion.

In addition, with the aim of tackling the housing problem and possible social exclusion, a social rental management model has been developed, which seeks to provide an answer to the housing issue and improve the socio-economic situation of its **vulnerable mortgage customers**.

- **The right to intimacy and privacy**

The Group ensures regulatory compliance in the use and processing of personal data in all the geographical areas in which it operates, with the intention of guaranteeing the right to data protection, the honour and privacy of **its customers**, and the confidentiality of their data; including people who the Group has relationships with and those who, even though they may not be customers, the Group has access to their data in order to carry out its activity at any given time.

- **Security**

The Group respects the applicable legislation in the field of Security, with the improvement of the physical facilities, the development of measures in the field of physical, banking, computer and

digital security that guarantee its customers' right to security being a permanent objective, as reflected in the BANCO SABADELL GROUP INFORMATION SYSTEMS SECURITY POLICY.

- **The fight against corruption**

The Group is committed to the fight against corruption of any kind, practice or form, including extortion and bribery; an explicit commitment made through its signing of the ten principles of the United Nations Global Compact, and which is set forth in the BANCO SABADELL GROUP ANTI-CORRUPTION POLICY.

- **Anti-money laundering and countering the financing of terrorism**

The Banco Sabadell Group is committed to this fight, and in this regard, in its operations with its **customers**, it complies with the obligations imposed on the prevention of money laundering and the financing of terrorism, as developed in the BANCO SABADELL GROUP ANTI-MONEY LAUNDERING AND THE FINANCING OF TERRORISM POLICY and certain operations are limited to countries and people affected by international sanctions.

### 2.1.3 In relation to suppliers or other business partners:

- **Transparency**

In the supplier **tendering** process, the Group facilitates maximum transparency, providing all participants with accurate information and giving opportunities to alternative suppliers; this process is carried out in accordance with the GROUP'S CODE OF CONDUCT, available on the Group's website and, therefore, publicly accessible, together with the BANCO SABADELL GROUP CODE OF CONDUCT FOR SUPPLIERS, thus ensuring that suppliers are aware of and/or can consult them at any time during the process.

In addition, **commercial relationships** between the Banco Sabadell Group and contracted suppliers must be fully transparent, in accordance with the provisions of the related policy.

- **People's dignity, diversity and inclusion**

The Banco Sabadell Group demands a commitment to socially responsible practices and respect for human rights from its suppliers in the exercising of their business activity, including the dignity of people and their most fundamental values, rejecting any form of forced labour or exploitation, and promoting the contracting of its **employees** without any discrimination, in a working environment in which diversity and inclusion are promoted.

- **Occupational health and safety**

The Group encourages its suppliers to contract their **employees** in accordance with applicable labour legislation, ensuring a healthy and safe working environment, respecting labour agreements and other legal provisions, and ensuring a working environment free from harassment, abuse, intimidation or violence.



- **The fight against corruption**

The Group seeks to ensure conduct showing an absolute rejection against any practice of corruption, including extortion and bribery from its **contracted suppliers**, in all its geographical areas; thereby ratifying its commitment in this matter for all its stakeholders; which was made explicit in the signing of the ten principles of the United Nations Global Compact as reflected in the BANCO SABADELL GROUP ANTI-CORRUPTION POLICY.

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

- **The dignity of people**

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

- **The fight against corruption**

The Group prohibits any type of conduct, practice or form of corruption, expressly forbidding any action of this nature, as set forth in the BANCO SABADELL GROUP ANTI-CORRUPTION POLICY.

As a signatory to the ten principles of the United Nations Global Compact, it is explicitly committed to fighting corruption in its different forms, including extortion and bribery, prohibiting any such conduct in any contact that the Group establishes with the community with which it interacts, and in all the geographical areas in which it is present.

- **Contributing to the achievement of the UN Sustainable Development Goals (SDGs) linked to fundamental human rights**

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

- **Solidarity**

The Group is committed to the development of societies in which it is present and promotes its collaboration in various solidarity projects through direct donations, taking into account the limits established in the BANCO SABADELL GROUP ANTI-CORRUPTION POLICY, and/or corporate volunteering activities involving its employees, for the benefit of various initiatives aimed at those most in need, and activating the necessary resources to advance social development within its field of influence.

- **The right to housing**

As far as possible, the Group promotes practices that contribute to tackling the housing and social exclusion problems of the most disadvantaged groups, facilitating the transfer of real estate assets to be occupied by non-profit institutions and foundations aimed at providing support to the most vulnerable and/or at-risk social groups.

- **Inclusion**

The Group promotes inclusiveness among all its stakeholders, including **society** as a whole.

For this purpose, it promotes and participates in financial literacy programmes, and with a focus on the group of people in situations of social exclusion, the Group collaborates in projects specifically aimed at their integration into the labour market.

- **Transparency**

The Group, through the various communication channels at its disposal, provides **analysts, investors and/or shareholders** with complete, clear and truthful economic and financial information which faithfully reflects its accounting and equity reality, in accordance with generally accepted accounting principles and applicable international financial reporting standards.

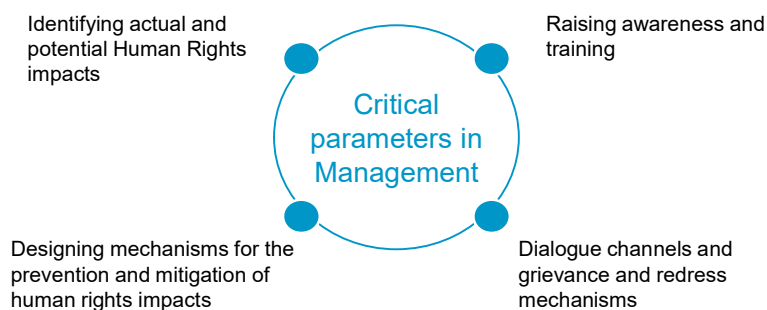
The **publication of its financial data and profit and loss reports**, available on the corporate website, is based fully on the principles of transparency of information, in accordance with the applicable legislation.

## 2.2 Management parameters

The Group integrates its commitment to support and respect human rights into its strategy, processes and operating model, so that all entities within the Group are responsible for their compliance, each in its field of influence, in order to achieve the Group's objectives on the matter of human rights.

In particular, the Group **identifies, prevents and mitigates, establishes remediation mechanisms and training on** the potential negative human rights impacts of its activities and processes, especially in the granting of financing to companies, in the human resources management model and also in supplier contracting processes.

Figure 2. Commitments



### 2.2.1. Identification of actual and potential human rights impacts on the various stakeholders

The Group provides **employees** with the appropriate procedures to analyse the customer's needs through study processes and granting of financing that take into account aspects such as: the customer's ability to pay, the prudent relationship between the amount lent and the value of the guarantee, or information on the costs of the products; analysing them based on the financing and investment transactions under the premise of minimising the possible risks of over indebtedness or other negative impacts related to human rights.

Moreover, through the **identification** of the rights involved in the management of its human resources, and with the desire to avoid a possible negative impact on its group of **employees**, the Banco Sabadell Group aims to ensure equality in its selection, internal movement and external contracting processes, ensuring that the working conditions (working timetables, rest periods, leave, flexibility, work-life balance, remuneration and social benefits), together with the safety of the workplace, comply with labour regulations in force; acting in accordance with the principles of dignity, diversity and inclusion involved in these processes.

Similarly, it makes all applicable preventive measures regarding safety and occupational risk prevention available to **employees**, ensuring that they have the necessary training in this matter and that they carry out their activities in safe conditions. All employees must comply with the published health and safety obligations and report any concerns, safety violations or incidents immediately.

In addition, being aware of the risk of potential data and privacy breaches, the Group acts to ensure the protection of personal data through the appropriate management of this information; and conducts the marketing of its products and services, marketing and advertising in a way that safeguards personal information relating to **customers** and the **community with which the Group interacts**.

As regards the identification and control of risks related to corruption, in each of the companies of the Group as applicable, the Board of Directors, either directly or, where appropriate, through the corresponding Committees, promotes and supervises the adoption and implementation of a specific anti-corruption programme within the Criminal Liability Prevention Programme. In addition, as part of its training programme, the Group has a specific course on the subject, which is compulsory for all employees as well as specific training plans on anti-money laundering and countering the financing of terrorism, as explicitly set forth in the GROUP'S ANTI-CORRUPTION POLICY and in the BANCO SABADELL GROUP ANTI-MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM POLICY, respectively.

### 2.2.2. Designing mechanisms for the prevention and mitigation of human rights impacts

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

In this regard, the Group requires **its suppliers** to have knowledge of, respect and formally adhere to the CODE OF CONDUCT FOR SUPPLIERS, which is reflected in the OUTSOURCING POLICY and is publicly available on the website, which determines the fundamental principles in terms of human rights which must be respected in the exercising of their business activity, and which must include best practices in ethical, social and environmental matters. This ensures that the hiring of employees by the Group's suppliers is done in accordance with labour legislation in force as well as the international labour conventions, including those of the ILO.

In addition, it provides for the possibility of conducting reviews, when deemed appropriate, to ensure suppliers comply with this code.

The tendering process for suppliers who apply to enter into business relationships with the Banco Sabadell Group is carried out in accordance with the parameters established in the GROUP'S OUTSOURCING POLICY. Given that outsourcing agreements may generate conflicts of interest between the parties involved, in order to avoid these conflicts, it is necessary to identify, evaluate and manage them in accordance with the criteria and procedures established in the aforementioned policy, which includes specific sections for the management of these possible conflicts.

In addition, the Banco Sabadell Group promotes the financing and investment in its products, paying attention to the most vulnerable groups, so that they are not discriminated against by the commercial offer available, also encouraging the design of the environmental and/or social products and services with the aim of fostering social and financial inclusion, and ensuring the practice of responsible lending. In addition, in order to protect those **using its financial services**, it strengthens the established procedures for information on financial services and the assessment of the borrowers' creditworthiness.

Finally, the Group promotes the maximum transparency for its **customers** when it comes to disseminating information on the products and/or services included in its commercial offer, adopting responsible communication practices that avoid the manipulation of information, offering all the necessary and relevant information to ensure that the appropriate decisions can be made, warning customers of the applicable risks, costs and fees, and protecting their integrity and honour, in accordance with the recommendations of the Code of Good Governance of Listed Companies of the Spanish Securities Market Commission (CNMV in its Spanish initials).

Access to **customer data** by the obliged parties is justified on the grounds of the data protection regulations, and business dealings are conducted, where necessary, in an environment that ensures the privacy of conversations and documentation used.

The Group addresses issues in the **local communities in which it operates**. Thus, with regard to the group of **vulnerable mortgage customers**, the parent company deals with the existing social housing problem, working to grant affordable and social rents which prevent a possible situation of social exclusion, and encourage an improvement in the socio-economic situation of this group through a complementary support service which facilitates their integration into the labour market. For the rest of the geographical areas in which the Group is located, such as its British subsidiary or its company in Mexico, its participation in various charitable causes and initiatives should be highlighted, which are mainly focused on supporting **people** in their respective geographical environments in situations of particular difficulty or vulnerability.

The Group will refrain from participating in the financing of operations whose object is directly related to anti-personnel mines and/or cluster bombs, because of their particular impact on the right to life and integrity of people, especially **civilians**, as well as from establishing business relations related to what are known as "controversial weapons" and/or "countries subject to arms embargoes"; both categories, according to the definitions set out in existing UN treaties and conventions, and as defined in the POLICY ON RESTRICTING FINANCE FOR AND INVESTMENT IN ACTIVITIES ASSOCIATED WITH THE ARMS INDUSTRY.

Since 2011, the Group has been a signatory to the Equator Principles, an international reference framework for the assessment and management of the potential environmental and social risks, including those related to human rights' violations. In doing this, the Group identifies risks related to human rights in its business operations in the **financing of and/or investment** in companies and/or projects and corporate loans.

With regard to its **employees**, the Group has established procedures for the selection, management, promotion, remuneration and development of people which ensure respect for diversity, equal opportunities, meritocracy and non-discrimination on any grounds, in line with the principles contained in the Code of Conduct, in its human resources plans (remuneration policy, equality plans, etc.), as well as with the provisions of the General Disability Law applicable in Spain. In accordance with the provisions of this Law, striving to ensure non-discrimination in the labour integration of the group of **people with functional diversity**, equitable environments are promoted, through direct contracting and also through alliances with entities of high standing in this field.

In addition, the Group acts proactively to prevent, manage and mitigate the risk of possible occupational accidents, reinforcing measures if external circumstances (epidemics, pandemics, etc.) so require, with the aim of guaranteeing the health and safety of its **employees** in the performance of their duties and tasks; and also considering psychosocial factors related to occupational stress and the mental health of the workforce.

For this same group, in its explicit commitment to fight against any form of corruption, beyond strict compliance with existing regulations, the Banco Sabadell Group has an ANTI-CORRUPTION GROUP POLICY that applies to all its employees, as well as the CODE OF CONDUCT, and the CONFLICTS OF INTEREST, PREVENTION OF CRIMINAL LIABILITY and ANTI-MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM Policies.

In this regard, the Group pays special attention to the accounts held by **political parties, people with public responsibilities or related institutions**, by controlling the donations and contributions they may receive from third parties; and the Banco Sabadell Group refrains from making any kind of contribution to these groups. As for donations made to non-governmental organisations and/or foundations in the form of **sponsorships and/or collaboration**; these are carefully analysed and independently audited by third parties in order to avoid any risk of corruption in any form.

In addition, in order to avoid possible conflicts of interest, the acceptance of gifts, personal advantages or benefits of any kind, for oneself or for 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, in order to prevent, identify, evaluate, report and manage any possible conflict of interest that may arise.

Similarly, any conduct related to the giving, requesting, receiving or accepting of an unjustified benefit or advantage, of any nature, for oneself or for a third party, as undue consideration in **business relationships** is not tolerated; and any payment and/or collection must be for services actually provided, following established authorisation circuits, as well as being documented and accounted for.

### 2.2.3. Dialogue channels and grievance and redress mechanisms

The Group has established the necessary channels of communication for participation and dialogue with its various **stakeholders**, in order to be aware of any incident related to a possible violation of human rights, and it understands that grievance mechanisms are an essential part of ensuring due diligence in this area. For this purpose, the Banco Sabadell Group has set up several internal and external mechanisms that allow queries, complaints, conflicts of interest, claims and reports from its staff, customers, investors and shareholders, as well as from collaborators, suppliers and third parties with whom it has dealings. The existence of these confidential channels available to employees makes it possible to manage existing doubts about the practical application of the human rights at stake, as well as to report any possible breaches of the CODE OF CONDUCT.

The Group reports human rights aspects in the Consolidated Statement of Non-Financial Information, in compliance with the general provisions published in Law 11/2018 on non-financial information and diversity, as duly detailed in the BANCO SABADELL GROUP FINANCIAL AND RELATED NON-FINANCIAL INFORMATION DISCLOSURE POLICY.

### 2.2.4. Raising awareness and training

In the Group, knowledge and culture of human rights is promoted through the necessary related notifications, making employees aware of the importance of following the processes developed with the intention of being able to observe the maximum respect for human rights.

To do so, it collaborates in the development of training courses aimed at the early detection and communication of possible conduct which breaches these international principles, thus detecting and reducing the likelihood that they will materialise.

In the case of people with posts that are exposed to a higher risk of potential impact on human rights, such as employees in departments that manage **financing and/or investment** projects in corporate loans, **labour relations or data security**, among others, these people have specific knowledge available in this regard, thus ensuring maximum respect and protection of the related human rights in the performance of their business activity.

### 3. Implementation

The Group has control instruments for the operational procedures arising from this policy, such as office tools with ESG information, which compile indicators related to human rights that comply with Law 11/2018 on non-financial information and diversity.

It is also necessary to highlight the Group's internal and external communication channels, through which stakeholders can send their queries, complaints, suggestions and claims; report both non-compliance with the Code of Conduct ([0901CEC@bancsabadell.com](mailto:0901CEC@bancsabadell.com)), and any risk or possible incident related to human rights committed by the personnel concerned in the performance of their duties; ensuring the confidentiality of the informants' identities when dealing with these notifications.

In this regard, an **email** address has been set up where **affected employees** can send their complaints regarding the **equality plan** in force in each division; and specifically, in the event of any possible discriminatory conduct for reasons of gender, in relation to professional development, equal opportunities or their work-life balance, and also, in the event of sexual harassment, gender-based harassment and/or workplace harassment.

There is also a customer service department to handle and resolve complaints or claims from the **Group's customers and financial users**, working independently from the operating and business lines, in order to guarantee their decision-making autonomy, and under the principles of transparency, independence, efficiency, coordination, speed and security. **Customers and users** may also appeal to the **Customer Ombudsman** (or similar role according to the geographical area or the type of activity), an independent body from the Group which has the authority to resolve any issues referred to it, both in the first and second instances. Decisions by both of these services are binding on all the bank's subsidiaries.

The email addresses [InvestorRelations@bancsabadell.com](mailto:InvestorRelations@bancsabadell.com) and [accionista@bancsabadell.com](mailto:accionista@bancsabadell.com) are made available to **institutional investors** and **retail shareholders**, respectively, and are managed by the communication and contact with shareholders, institutional investors and voting advisers.

Anyone **who forms part of the Group**, whether through an employment relationship or as a member of its governing bodies, has access to the email address: [CanalDenunciasGBS@bancsabadell.com](mailto:CanalDenunciasGBS@bancsabadell.com), through which they can inform the organisation of any indication of a possible offence or irregularity due to individual or collective conduct or regarding activities that occur in the context of the activity of any of the Group's companies, including the activities carried out by third parties in their relationship with the Group, such as **suppliers and/or providers of goods and services**.

Finally, society in general, or **third parties** related to the Group, can channel any queries through the sustainability mailbox at ([Sostenibilidad@bancsabadell.com](mailto:Sostenibilidad@bancsabadell.com)), available on the corporate website in Spanish, Catalan and English.

#### **4. Monitoring, evaluation and control**

Through the annual *Non-Financial Information Statement*, the Group publicly discloses all aspects and indicators related to human rights in the institution, in accordance with the general provisions published in Law 11/2018 on non-financial information and diversity. This is accessible to all its stakeholders, investors and consumers; it promotes, through its Corporate Ethics Committee (CEC), the ethical conduct of the entire organisation to ensure compliance with the principles set forth in the Banco Sabadell Group Code of Conduct, this being the competent body to respond to the reports received through the Whistleblower Channel, or in the event of any criminal risk or potentially criminal act committed by any employee, collaborator, supplier or third party in their relationships with the Group.

Furthermore, the implementation of dialogue resources and participation channels established by the Banco Sabadell Group both internally and externally, for all its stakeholders (employees, customers, investors and shareholders, collaborators, suppliers or third parties) in the geographical areas in which it is present, serve as a vehicle for any query, complaint, suggestion and claim related to the matter of human rights in the performance of its activity; thus ensuring that, in the event of any violation in this matter, it can be reported; and guaranteeing the confidentiality of the informants' identities in dealing with these notifications.

For the proper management of these notifications, the necessary mechanisms are put in place to give redress or restoration to the victims of any possible violation or damage inflicted in this regard, in the event that the Group is directly responsible (by making apologies, restitution, financial or non-financial compensation, interim measures, etc.).

Also conducting workplace health and safety assessments, internal audits, stakeholder satisfaction surveys, or from information gathering sources (whether they are formal or informal, internal or external, direct or third party, quantitative or qualitative, related to the area of human rights protection and respect), acting as part of the investigation, evaluation and monitoring system in this regard. All this may reveal possible environments affected by negative impacts, which will provide the basis for correcting, if necessary, the procedures and ensuring due diligence, as part of a process of continuous learning, improvement and the prevention of future harm.

#### **5. Document governance**

The BANCO SABADELL GROUP HUMAN RIGHTS POLICY is approved by the Banco Sabadell Board of Directors, which is the highest authority in the approval of its policies and it comes into force from that moment on; with its content being subject to review at least once a year.

This policy is available to all employees through the channel that the Group considers appropriate at any given time; with an extract of it being published on the Banco Sabadell Group corporate website.

