

Statement on Human Rights

Hellenic Bank Public Company Limited (the ‘Bank’) is committed to respect and promote human rights, which is fundamental to its business operations and rooted in the Bank’s corporate values. The Bank aims to provide a positive impact to staff members, clients, suppliers, investors and for the communities it operates in.

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1. Principles

Hellenic Bank Public Company Limited ('the Bank'), based its principles in relation to human rights on the Universal Declaration of Human Rights (UDHR), the International Covenant on Economic Social and Cultural Rights (ICESCR) and the International Covenant on Civil and Political Rights (ICCPR). Together these are known as the International Bill of Human Rights that set out the civil, political, economic, social and cultural rights that everyone is entitled to. The International Bill of Human Rights identifies the responsibilities placed on State's to respect, protect and fulfil those rights. Furthermore, the Bank took into account the "Protect, Respect and Remedy" framework of the UN Guiding Principles on Business and Human Rights (UNGPR) which defines the responsibilities of States and business enterprises for protecting and respecting human rights.

In addition to State's duty, businesses also have the responsibility to respect human rights and this responsibility for the Bank is outlined in this Human Rights Statement. In addition, the Bank has the obligation to follow the regulatory framework that applies for its operations.

The Bank identified the following main stakeholders that it impacts in relation to human rights and applied an approach for each as outlined below for staff members, customers and suppliers.

2. Staff Members

The Bank strives to create a respectful, rewarding, diverse, positive, productive working environment and supportive workplace which enables staff members to thrive, values diversity and provides equal opportunities for all. The Bank has in place well established human resources policies, procedures and practices that address issues such as diversity, equal opportunity and for the provision of a working environment free from any harassment and discrimination.

Furthermore, under the freedom of collective bargaining, the right of workers and the Bank to form and join organisations of their own choosing is an integral part of a free and open society to collectively express, promote, pursue and defend common interests and is of great importance to the Bank.

The Bank's corporate values underpin the way it conducts its business with its customers and counterparties, guide its decision making and determine the way all persons subject to the Bank's 'Code of Business Conduct and Ethics', are expected to behave.

The Bank's Code of Business Conduct and Ethics defines the standards, principles, values and rules of conduct and behaviour by which all activities of the Bank should be governed in all its dealings. This code is used as a guide in determining key business decisions and actions to help staff members conduct business in an honest, transparent and professional manner and to enable the Bank to maintain high cultural and ethical standards. The Bank also has zero tolerance to bribery and corruption which is implemented through its anti-Bribery and corruption policy. Any policy violation shall be dealt with according to the Bank's disciplinary code and the Code of Business Conduct & Ethics.

Additionally, the Bank has a number of policies and practices in place that outline in detail its standards, principles and practices and how these are implemented in order to identify, prevent and mitigate any adverse human rights impacts in the following areas:

- Freedom from harassment in the workplace: the Bank acknowledges the seriousness of harassment in the workplace and confirms that such conduct of any kind, either direct/ indirect/ implied, is considered unacceptable and unjustified and all necessary actions are taken to ensure that such behaviour or form of misconduct does not take place

- Diversity: the Bank welcomes and values diversity in all its forms, whether it relates to age, gender, ethnicity or cultural background by creating a culture which is unaffected from discrimination practices and promotes respect and impartiality. This is reflected in all HR Policies and practices including recruitment, remuneration, learning and development, performance appraisal, diversity policies and practices
- Health and safety and working conditions: the Bank applies the highest health and safety standards across all its operations and offices and is constantly taking measures to promote and improve health and safety conditions. The Bank's remote working policy provides alternative and flexible working arrangements to staff members that fit best their personal needs and professional preferences
- Personal Grievance Committee: its purpose is to deal with situations concerning labour relations between an employee and the Bank, that affect or that may affect the working conditions of the employee
- Whistleblowing Policy: this Policy defines, in line with the applicable legal and regulatory framework, the guidelines and principles for the reporting and effective management of named or anonymous whistleblowing reports, on matters of concern or suspicion such as any serious irregularities and omissions, unethical or questionable practices, potential or actual breaches of the regulatory framework, internal policies and procedures. The Bank's aim is to protect staff members from any form of retaliation and safeguarding confidentiality and/or anonymity if this is the wish of the reporting person.

Finally, the Bank aims to treat staff members fairly and consistently. The 'Disciplinary Code' deals with irregular conduct of its staff members in a fair and consistent manner. Disciplinary offences include among others the breach of Code of Business Conduct and Ethics as well as code for dealing with harassment in the workplace.

3. Customers

In conducting business with its customers, the Bank might be exposed to the risk of indirectly contributing to or being directly linked to a range of events that impact human rights.

The Bank has in place policies and mechanisms to identify, prevent and mitigate such human rights impact through the below:

- The Bank maintains a clear lending strategy which includes the maintenance of a prohibited lending list that excludes certain activities which might directly or indirectly be linked to human rights violations to be financed. Prohibited activities include activities involving exploitative labour and discriminatory practices, prohibited in relation to the protection of cultural heritage, in violation of health and safety laws, in relation to animal testing, considered ethically or morally controversial, among others
- The Bank assesses environmental, social, governance ('ESG') factors as part of certain customer's assessments which include parameters in relation with their customer relations, human capital management, health and safety practices, community engagement and responsible production practices. As a result, the Bank will not engage in business activities where substantiated evidence of adverse human rights cannot be avoided or mitigated
- The Bank's process in relation to assessment and approval of new products include the consideration of ESG matters

- The Bank has developed and continuously enhances a culture of compliance in relation to the protection of personal data as well as high standards of information security practices to protect customer's data.

4. Suppliers

The Bank is aware that human rights risks may arise that are outside its direct business activities and operations, within its supply chain. The Bank's due diligence performed in the procurement process takes into consideration ESG parameters, along with other third party risk management assessments performed.

In particular, the vendors must declare their compliance to child labour laws and non-engagement in human trafficking, criminal activities and human rights violations in order to be eligible.

5. Communication and Reporting

The Bank encourage its stakeholders to bring to its attention instances where products and services have potential or real human rights impacts, using existing channels such as: (a) by phone to the Customer Contact Centre at 8000 9999 or +357 22500500 if calling from abroad), (b) by email at suggestionsandcomplaints@hellenicbank.com , (c) in writing by completing the Customers' Feedback Form available at any Customer Service Unit.

Further details on the Bank's ESG initiatives and implementation actions can be found within the latest:

- ESG Impact Report and within
- Pillar III disclosures report – ESG disclosures
- Financial Reports
- Financial results presentations.

The above can be found in the Bank's website: www.hellenicbank.com.

This statement has been approved by the Management Board on 09.01.24.