

AstroBank Policy Statement on Human Rights

1. Scope and Coverage

At AstroBank Public Company Limited (hereinafter referred to as 'AstroBank' or 'Bank') we recognize that long-term and continued success can be achieved only in societies where human rights are protected and respected.

Our commitment to human rights is already well embedded into our existing frameworks, policies, and procedures, such as our Code of Conduct and our Environmental, Social and Governance (ESG) Control Framework, applicable to our employees, customers, suppliers, and any other party with whom the Bank cooperates, our shareholders and the community in which we operate (hereinafter referred to as 'Stakeholders').

The Bank has adopted this statement to demonstrate its commitment to uphold and promote human rights. Together with our Code of Conduct which provides the ethical and behavioral framework to guide the business decisions we make every day, this statement builds on our Code of Conduct, aiming to reflect our understanding of the fundamental rights of all human beings and our commitment to promote respect for those rights.

The Bank aims to cultivate a strong relationship of trust that respects human rights in all our activities with employees, customers, suppliers, contractors, and other stakeholders based on fairness, courtesy, respect, honesty, and transparency.

With regard to our key stakeholder groups, we specifically commit to the following:

2. Commitment to Our People

Our people are our greatest assets. Our objective is to make AstroBank a great place to work, enabling colleagues to deliver the best results for our customers, business associates, shareholders, and the community in which we operate.

One of the most important priorities for our Bank is to ensure that all our employees are treated with respect and dignity.

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.

AstroBank is committed to the following standards:

a. Right to Equal Opportunities

The Bank is an equal opportunities employer respecting the personality of everyone. AstroBank has developed a great place to work in line with its principles and corporate values within which all employees have equal opportunities.

The Bank has established human resources policies, procedures and practices managing issues regarding recruitment, development, training, compensation and benefits, promotion, transfer, succession, etc, that address issues such as diversity, equal opportunity and for the provision of a working environment free from any harassment and discrimination.



b. Freedom from harassment

At AstroBank we apply a zero-tolerance approach for any forms of violence, harassment and sexual harassment in the workplace and confirm 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.

AstroBank treats such incidents with respect and confidentiality while promptly investigates all allegations. The Bank shall enforce disciplinary action to those committing acts of harassment of sexual or any other form.

c. Health and Safety and Employees' wellbeing

The Bank is committed to provide and maintain safe and healthy working conditions that meet or exceed applicable legal standards for occupational health and safety. The Bank has established a certified Health and Safety Management System in accordance with national and EU laws to ensure that the highest health and safety standards are always applicable across all offices and operations of the Bank, even under extreme public health crisis situations.

The Bank is also committed to being recognized as a responsible employer, that supports the wellbeing of its employees. Realizing that its employees may encounter, throughout their lives, events that may affect them in the workplace including those related to their health, personal or domestic situation as well as work-related problems, the Bank has introduced working practices and services that support employee wellbeing and work life balance such as flexible work arrangements, Care Leave for family members, quit smoking seminars, etc.

d. Freedom of Association and Collective Representation

The Bank recognises employees' right to freedom of association and encourages them to express their opinions and share their ideas. The Bank expects its employees to respect others' opinions and speak up about actions and behaviours that have no place in the Bank.

e. Forced labour, Child labour and Human trafficking

The Bank never hires any underage employee and does not oblige in any direct or indirect way any employee to any compulsory occupation.

3. Commitment to our Customers

In respect to customers,

- The Bank acts in accordance with fair business, marketing, and advertising practices and takes reasonable steps to ensure the safety and quality of the products and services it provides.
- The Bank discloses to the public all appropriate information on the products/services it provides, through informative and accurate advertising and other appropriate methods.
- The Bank aims to provide ESG sustainable products and services, taking into consideration not only financial elements but also environmental and social elements when taking financing and investment decisions. The Bank undertakes not to finance activities with adverse impact upon the environment, community, and human rights.
- The Bank attaches importance to holding customer information in confidence and not sharing such information with third parties in accordance with the provisions of the applicable law. All employees undertake to treat confidential information acquired by



- them whilst doing their jobs and to use such information solely for the purpose of fulfilling their professional duties.
- The Bank acts in accordance with restrictions and regulations associated with banking secrecy, customer secrets, disclosure of personal data to third parties as set within the framework of the provisions of the Business of Credit Institutions Law and/or other relevant legislation.

4. Commitment to our Suppliers

In respect to suppliers,

- The Bank seeks to engage with suppliers and external providers / contactors whose values and business principles are consistent with its own and who respect human rights, labour rights, employment laws and environmental regulations.
- The Bank pays attention to products and services purchased not causing any adverse impact on the environment and community. Therefore, environmental, and social criteria have also been included in supplier selection and assessment as well as into the contract processes that are run with suppliers, thereby, encouraging these stakeholders to fully comply with environmental legislation, labour legislation and international human rights.
- The Bank expects its suppliers to have processes in place to prevent, mitigate, and remediate adverse human rights impacts that they may cause or to which they may contribute, and expects those suppliers to cascade that expectation as well through their own supply chains.

5. Grievance and Enforcement Mechanisms

The Bank is committed to ensuring respect for human rights and educates and encourages its stakeholders to disclose any events that could have potential or real human rights impacts via various methods and communication channels.

We encourage any person who considers that he or she has been subjected to violence and / or harassment, as well as any person who becomes aware of incidents of violence and / or harassment in violation, to promptly and without delay report the incident by using one of our communication channels.

All stakeholders have the opportunity to raise questions and or concerns regarding potential and actual adverse Human Rights impacts by (1) completing an electronic Communications form and submitting it through the Bank's external website, (2) Reporting the incident in any of the Bank's branches and (3) through the Bank's Call Centre which is available 24 hours per day, 7 days per week including holidays, by phone, web, or email.

The Bank does not tolerate retaliation against anyone for raising a concern in good faith, expressing concerns or opinions. The Bank is committed to investigate any concerns, and if any severe adverse Human Rights impacts are discovered, the Bank will act appropriately without delay.



6. Disclosure and Monitoring

The Bank reports its actions and engagement on human rights in its annual sustainability report. It also makes public on its Internet site as well Internal intranet site the values, principles, policies, and practices that this policy reinforces.

This statement has been approved by the Board of Directors of AstroBank.

The Bank is committed to undertake a formal review of the existing statement for Human Rights periodically and its application, ensuring also that is always updated with changes in the legal framework and corporate responsibility matters, including ESG.