

Human Rights Positioning

Bank ABC supports and protects fundamental internationally proclaimed human rights, including acknowledging the UN's Universal Declaration on Human Rights¹. The Bank's expectations are applicable across all aspects of the Bank's value chain including employees, operations (including suppliers), and customers, and ensures that all people are free and equal in dignity and rights. The Bank further recognises global agreements such as the International Labor Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work², adopted in 1998, respecting human rights including the right to collective bargaining and elimination of discrimination within the workplace. The Bank considers UN Guiding Principles on Business and Human Rights³ in its approach, including to make sure it retains ongoing efforts to protect, respect and remedy human rights matters across its value chain.

Our Employees

Bank ABC endeavours to ensure human rights abuses are eradicated in all forms across the workplace for employees. The respective Boards of the Group and units shall be aware of relevant jurisdictional regulations across the Bank's footprint and exercise oversight to ensure the Bank is compliant.

The Bank shall ensure it promotes equal opportunity and prevents discrimination across all aspects of its hiring and promotion processes, whilst ensuring all units retain adequate governance and controls to evidence such an approach.

Our operations (including suppliers)

The Bank expects all aspects of its operations, including its suppliers, to ensure they are not complicit in human rights abuses. In a practical sense, the Bank commits to undertaking risk-based due diligence, facilitated by impact assessments, across its suppliers in line with the Bank ABC Vendor Code of Conduct, Vendor Due Diligence Procedure and OECD guidance for responsible business conduct⁴, to ensure responsible business is conducted both regionally and internationally.

The Bank shall perform periodic monitoring of its supply chain to ensure it is not complicit in human rights abuses. In instances of possible human rights concerns being made apparent to the Bank, Bank ABC shall undertake stakeholder engagement to ensure situations are promptly remedied. This may involve undertaking time-bound corrective actions, or in certain circumstances, terminating suppliers.

The Bank shall ensure that significant investment agreements across its operations contain appropriate human rights clauses and that such agreements are subject to human rights screening at the outset.

¹ [Universal Declaration of Human Rights](#)

² [ILO Declaration on Fundamental Principles and Rights and Work](#)

³ [UN Guiding Principles on Business and Human Rights](#)

⁴ [OECD Due Diligence Guidance for Responsible Business Conduct](#)

Our customers

Bank ABC expects its customers to support and respect internationally proclaimed human rights agreements as outlined in this document. Expectations for customers are broadly similar to those of suppliers', in that they shall cover due diligence at the onset of the relationship – facilitated by the Bank's Client ESG Risk Assessment questionnaire – cover periodic monitoring via the Bank's annual review process, and include engagement to remedy situations where required.

ABC's commitment to transparency

Bank ABC commits to openness and transparency on an ongoing basis in line with the UN's Guiding Principles on Business and Human Rights. The Bank shall report on its progress towards human rights on an annual basis, as part of its annual Group Sustainability Disclosures Report. The Bank vows to continually improve, and will continue to assess industry practice, local regulatory expectations across its jurisdictions, and leading international agreements when determining its approach.



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Licensed as a conventional wholesale bank by the Central Bank of Bahrain