

PRINCIPLES ON HUMAN RIGHTS

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PRELIMINARY REMARKS

Given that each State, according to the United Nations International Bill of Human Rights, has the precise responsibility to respect, protect and promote human rights and the fundamental freedoms for all, without any distinction of gender, ethnic group, language, religion, age and political persuasion and union association, origin, disability or other status and particular conditions, ALEXBANK as a bank of Intesa Sanpaolo Group recognizes the fundamental principle affirmed by the Universal Declaration of Human Rights and by the UN Guiding Principles on Business and Human Rights which attaches similar responsibility also to each single individual and to businesses.

INTERNATIONAL STANDARDS

ALEXBANK, in addition and without prejudice to respecting national laws and regulations, is committed to identify, mitigate and where possible prevent, potential violations of human rights linked to its own activities, as recommended by the UN Guiding Principles on Business and Human Rights.

ALEXBANK adheres to the UN Global Compact and is committed to respect and promote the ten fundamental principles relating to human rights, labor rights, protection of the environment and future generations and anti- corruption.

As part of Intesa Sanpaolo Group which is a member of UNEP Finance Initiative (UNEP FI) since 2006, ALEXBANK had endorsed in 2019 the UNEP FI six principles for responsible banking in order to pursue a sustainable development, consistent with environmental protection.

GENERAL REFERENCES OF ALEXBANK

ALEXBANK has adopted a Code of Ethics which is drawn up in light of the parent company's code of ethics and which explicitly declares:

- to sustain human rights according to the Universal Declaration of 1948 and the International Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights;
- to respect the fundamental rights established by the eight conventions of the ILO (International Labor Organization) as stated in the ILO Declaration on Fundamental Principles and Rights at Work, in particular the right of association and collective bargaining, the prohibition of forced and child labor and non-discrimination in the workplace;
- to recognize the importance of the principles proclaimed in the 2016 United Nations Convention on the Rights of Persons with Disabilities; in addition to conforming to the provisions of the Egyptian law No. 10 of 2018 on the rights of persons with disabilities. The law reinforces equality between persons with disabilities and other people in terms of human rights and basic freedom as per article 1. Moreover, Banks are addressed with a dedicated article (33) of the Law and 77 of its executive regulations and according to it all banks are committed to render their building and banking services accessible tailored to persons with disabilities.
- to contribute to the fight against corruption –meant as the abuse of power, role and resources to obtain personal gain, or the inducement to make such an abuse – supporting the guidelines of the OECD (the Organization for Economic Cooperation and Development) and the anti-corruption principles established by the United Nations in 2003, also through an attitude of zero-tolerance to any episode of corruption.

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SCOPE OF APPLICATION

ALEXBANK is committed to promote human rights in all the situations where it recognizes an effect of its activity. In particular, utmost attention is given to the Bank's main stakeholders – employees, customers, suppliers, community – as established in its Code of Ethics. The environment, to which ALEXBANK recognizes the legitimacy of stakeholder, is considered across all scopes of application.

Employees

ALEXBANK is committed to respecting the personality and dignity of each employee, without prejudice to the Egyptian Law.

The following principles of the international standards, chosen based on their relevance and interpreted in the light of the Bank's context, are integrated in the Code of Ethics and in the Bank's policies:

- occupational Health and Safety;
- anti - harassment and monitoring working conditions that may cause discomfort and stress;
- right to privacy of personal and sensitive data;
- freedom of association: freedom to participate and associate in trade unions and in other forms of workers' representation;
- countering any form of child labor;
- non - discrimination based on gender, age, ethnic origin, religion, political persuasion and union association, language or disability or other status (equal opportunities in the hiring, management, professional development and career advancement of employees);
- right to a fair remuneration; protection of social security ensuring an adequate supplementary pension right to private life through policies of work-life balance.

Customers

ALEXBANK believes that a fair relationship with customers must be based on sharing corporate values and on the respect of human rights in all offered products and services, without prejudice to the Egyptian Law. The Bank's relationship with its clients is founded on the principles of equity and transparency; customers are at the center of the Bank's consideration through ongoing dialogue to embed their actual expectations, with special attention to the financial inclusion of most vulnerable social groups.

The following principles of the international standards, chosen based on their relevance and interpreted in the light of the Bank's context, are integrated in its Code of Ethics and in the Bank's policies:

- right to the privacy of personal and sensitive data;
- non - discrimination based on gender, age, ethnic origin, religion, political persuasion and union association, language or disability; or other status.
- right of customers to health and safety (policies and actions to counter robberies).

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Suppliers

ALEXBANK's relationship with its suppliers is founded on the principles of listening and dialogue, transparency and equity for a mutual benefit, without prejudice to the Egyptian Law. The Bank recognizes its responsibility towards society and the environment along the whole supply chain and for this reason:

- it selects, through clear and verifiable criteria, suppliers and sub suppliers that found their activity on social and environmental sustainability and that adopt measures and tools necessary to minimize possible negative impacts triggered by their action;
- it steers its suppliers and sub-suppliers' policies towards respecting human rights, labor rights and environmental protection.

The following principles of the international standards, chosen based on their relevance and interpreted in the light of the Bank's context, are integrated in the Code of Ethics and in the Bank's policies:

- non - discrimination based on gender, age, ethnic origin, religion, political persuasion and union association, language ,disability; or other status.
- right to health and safety (avoid commercial relationships with suppliers involved in violations of H&S standards);
- countering child labor and forced labor (avoid commercial relationships with suppliers involved in violations of this principle).

Community

ALEXBANK's relationship with the community is based on the principles of listening and dialogue with the diverse areas of civil society; the Bank is committed to assess the consistency of its financing, investment and other services with the following principles, integrated in the Code of Ethics and in the Bank's policies, without prejudice to the Egyptian Law:

- right to life and right to health;
- right of indigenous people to preserve, protect and develop their own traditions and cultures;
- right to an adequate life standard;
- right to education and to take part in cultural life.

Regarding the support to the community, ALEXBANK is engaged in community contribution activities and charitable giving, based on an attentive selection of beneficiary organizations and projects, with a special attention to human rights



MONITORING

The implementation and progressive extension of human rights' protection is monitored through:

1. the evaluation of the implementation and governance of the Bank's Code of Ethics performed also through the assessment by an independent third party according to the UNI ISO 26000 international standard, with a specific focus on human rights' issues;
2. annual sustainability reporting, which includes stakeholder engagement and defines improvement targets and the related performance indicators, subject to certification by an independent third-party auditor; and
3. the analysis of business impact and potential risks on human rights – subject to periodical update – which highlights the areas of greater risk taking into consideration the International Bill of Human Rights and the eight main ILO conventions as defined in the ILO Declaration on Fundamental Principles and Rights at Work, which is performed through regular reporting to Intesa Sanpaolo Group on human rights related issues as part of the data collection for the consolidated non-financial statement, as well as annual reporting to Compliance & AML dept. in the Compliance Annual Risk Assessment for context of Code of Ethics and Corporate Social Responsibility.

Based on the results of the monitoring processes described above, ALEXBANK is committed to:

- evaluate the need for an update of the present document;
- define guidelines of intervention to prevent and mitigate possible negative impacts on its stakeholders;
- issue, when needed, specific documents covering the rights involved and related activities.

As a further safeguard measure for all stakeholders, the corporate social responsibility mailbox (CSR@alexbank.com) is available, to which anyone can report cases of non - compliance, covered by confidentiality and protected from any form of retaliation, discrimination or penalization.

DISCLOSURE AND COMMUNICATION

The present document is brought to all employees' attention also through specific training sessions according to the different areas of operation, roles and responsibilities to raise their awareness and knowledge aiming at translating the ethical human rights values and principles into tangible actions in line with their job's focus area through defined processes.

This document will be published on ALEXBANK's website and will be made available on the Bank's intranet. A specific communication on the monitoring and assessment's results and on any mitigation actions is disclosed in the annual sustainability reporting.

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