

A 360-degree panoramic photograph of a lush green park. In the center, a man in a green shirt is riding a bicycle. To his left, a woman in a red top is walking. Further left, a man in a blue shirt is running. In the background, a soccer ball is visible on the grass. On the right side of the panorama, a woman in a red top is walking, and a man in a green shirt is running. In the foreground, a man in a red shirt is sitting on the grass, looking towards the camera. The sky is blue with some clouds.

# Bci Human Rights

## Policy and Management System

# 1.-WHAT IS A HUMAN RIGHTS MANAGEMENT SYSTEM?

FOR A COMPANY TO ASSUME ITS RESPONSIBILITY TO RESPECT HUMAN RIGHTS, IT MUST HAVE THE FOLLOWING IN PLACE:

1. Policy commitment to assume responsibility in respecting human rights

2. Due diligence process to identify, prevent, mitigate, and repair its human rights impacts

3. Processes for repairing all negative consequences

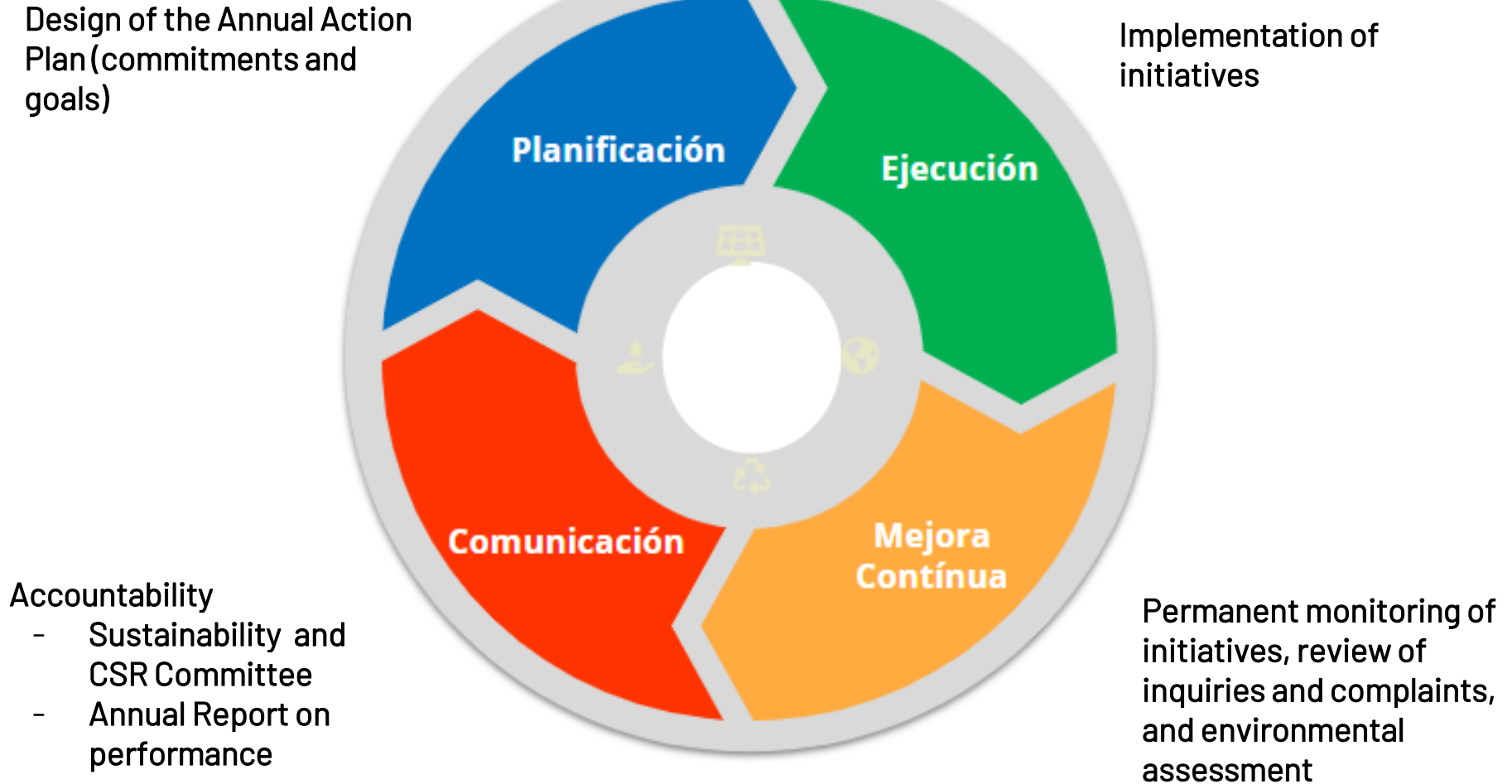
## COMPONENTS OF A HUMAN RIGHTS POLICY:

1. Explicit commitment to international human rights standards, including the Universal Declaration of Human Rights

2. Provisions on labor and non-labor human rights (specific to the industry)

3. Mechanisms for policy implementation and communication

## 2.-BCI HUMAN RIGHTS MANAGEMENT SYSTEM



## 3.-GOVERNANCE

- Leadership and coordination of the Human Rights Committee
- Monitoring the Annual Action Plan
- Proposals for continuous improvement
- Communication to stakeholders

### Corporate Affairs and Sustainability Division

#### Sustainability Committee

- Annual progress monitoring
- Feedback
- *Annual presentation*

#### Human Rights Committee

- Design and implementation of the Annual Action Plan
- Monitoring of initiatives and goals
- *Quarterly meetings*

#### Ethics Committee

- Complaint management
- Definition of reparation measures
- *Meetings to address specific complaints*

#### Bci employees

- Compliance with Human Rights Policy
- Request for guidance
- Receipt of complaints

# 3.-GOVERNANCE



- Design and execution of the mitigation plan
- Goal tracking
- *Quarterly meetings*



## Human Rights committee

DEPARTMENT	PERMANENT COMMITTEE	COMMITMENTS ON EACH DIMENSION
Corporate Affairs and Sustainability	Assistant Manager, Sustainability	<ul style="list-style-type: none"> <li>• <b>Commitments with the community</b> <ul style="list-style-type: none"> <li>○ Legal prevention / Free competition</li> <li>○ Ethics</li> <li>○ Emergency aid / Collaboration with NGOs</li> <li>○ Environment: Rodrigo González</li> <li>○ SDG Promotion / Financial inclusion / SMEs</li> </ul> </li> </ul>
Human Resources	Assistant Manager, Talent Attraction  Labor Relations Manager	<ul style="list-style-type: none"> <li>• <b>Commitments with employees</b> <ul style="list-style-type: none"> <li>○ Diversity and non-discrimination</li> <li>○ Culture of learning</li> <li>○ Sexual and workplace harassment / Health and safety / Collective bargaining</li> </ul> </li> </ul>
Purchasing	Purchasing Manager	<ul style="list-style-type: none"> <li>• <b>Commitments with suppliers</b> Purchasing Manager</li> </ul>
Wholesale Banking and Retail Banking	Business Development Manager / Wholesale Banking Division  Retail Banking Assistant Manager	<ul style="list-style-type: none"> <li>• <b>Commitments with customers</b> <ul style="list-style-type: none"> <li>○ Information privacy / Cybersecurity</li> <li>○ Inclusive infrastructure and services: Service areas</li> <li>○ MACH</li> <li>○ Blog: Con Letra Grande</li> <li>○ Financial Education Website: Yo Me Educo</li> <li>○ Green Agreement</li> <li>○ Principles for Responsible Investment</li> <li>○ Policy dissemination and commitment among large clients</li> </ul> </li> </ul>
Corporate Counsel	Board Secretary	<ul style="list-style-type: none"> <li>• <b>Legal advice and coordination with the Ethics Committee</b></li> </ul>

## 4.-ACTION PLAN(RISK MITIGATION)



CUSTOMERS

EMPLOYEES

SUPPLIERS

COMMUNITY

COMMITMENTS

INITIATIVES

RISKS AND MITIGATION PLAN

## COMMITMENTS

**1. Facilitate access to financial services for all people in Chile, through high-quality digital financial solutions.**

### RISK OR THREAT

People living in poverty, migrants, and people with disabilities publicly criticize or sue the Bank for discrimination in access to financial services.

Important segments of the population do not have access to financial services due to lack of infrastructure and digital solutions.

### MITIGATION PLAN

Promote the use and penetration of the Bank's new digital tools and services.

Have physical infrastructure and digital tools to facilitate access to financial services for people with disabilities.

**2. Promote financial education among all the Bank's stakeholders.**

### RISK OR THREAT

Customers become over-indebted and/or make poor financial decisions due to lack of knowledge about financial products.

Customers do not take advantage of possibilities in the financial market due to lack of knowledge.

### MITIGATION PLAN

Financial education for all audiences through the Con Letra Grande program.

Financial education for employees of registered businesses through the Yo Me Educo website.

Financial education for small and medium-sized companies through the Bci Empréndate Show on social networks.

## COMMITMENTS

**3. Safeguard the information privacy and confidentiality of Bci's customers, employees, and suppliers.**

### RISK OR THREAT

The Bank shares confidential financial information on its employees, customers, and suppliers.

Customers report data breaches.

### MITIGATION PLAN

Control, training, and awareness in cybersecurity and data protection.

**4. Analyze environmental and social risks in financial decisions and credit policies.**

### RISK OR THREAT

Corporate clients and/or companies in which Bci invests violate labor legislation, do not implement good ESG practices, cause environmental damage, do not respect the rights of indigenous peoples, and/or commit acts of corruption.

### MITIGATION PLAN

Promote a sustainable finance focus.

Meet the commitments in the Finance Ministry's Green Agreement.

Establish specific commitments and compliance goals in the framework of the Principles of Responsible Investment, signed in 2020.

**5. Among large corporate clients, promote the incorporation of human rights policies and periodic risk assessments of child and forced labor.**

### RISK OR THREAT

Corporate clients violate labor legislation and are sanctioned for child and/or forced labor practices.

### MITIGATION PLAN

Disseminate the Human Rights Policy in this customer segment by sending the document directly to top executives.

Transfer of good human rights practices to HR managers in partner companies, through the Yo Me Educo website.

COMMITMENTS	
1. Prohibit all discrimination based on ethnicity, ideology, socioeconomic status, religion, culture, gender, age, sexual orientation, nationality, physical characteristics, disability, or any other condition contemplated in the labor legislation.	<b>RISK OR THREAT</b> The Bank's employees or job applicants file internal or legal complaints, or publicly criticize the Corporation, for discriminatory treatment and internal processes.
	<b>MITIGATION PLAN</b> Initiatives aimed at leaders and employees to emphasize the importance of diversity and inclusion.  Context alignment through language and written content: talks, updated documents, Leader Academy, evolution, Bci Profile, etc.  Among leaders, promote the successful completion of the non-discrimination module, which is required to carry out search processes.
	<b>RISK OR THREAT</b> Employees file internal or legal complaints for sexual or workplace harassment.  The people affected suffer physical and psychological impacts from these practices.
2. Protect people against sexual and workplace harassment.	<b>MITIGATION PLAN</b> Implementation and formalization of the new Bci investigative process on sexual and workplace harassment.

COMMITMENTS	
<b>3. Ensure health and safety in the workplace and prevent occupational hazards.</b>	<b>RISK OR THREAT</b> Employees suffer accidents at work or occupational diseases due to lack of safe conditions and prevention measures.  Employees file internal or legal complaints for lack of conditions that guarantee their health and safety at work.
	<b>MITIGATION PLAN</b> Continuous improvement of standards in health, safety, and prevention.
<b>4. Guarantee the right to collective bargaining.</b>	<b>RISK OR THREAT</b> Employees file legal complaints against the company and/or call for a strike due to obstacles to forming unions or other anti-union practices.  Lack of knowledge on labor and union rights among management and leadership.
	<b>MITIGATION PLAN</b> Labor rights training for new leaders.  Fundamental rights training for leaders.

## COMMITMENTS

**5. Promote diversity and inclusion, through the appreciation of differences and the contribution that each person makes to the organization. Focus on priority groups: people with disabilities, the elderly, migrant workers, and women.**

### RISK OR THREAT

Employees file internal or legal complaints for noncompliance by the company with internal regulations and legislation on diversity and inclusion issues.

### MITIGATION PLAN

1. Generate ownership and awareness of unconscious biases, from the perspective of diversity and inclusion, through initiatives aimed at leaders and employees.
2. Strengthen internal process intervention with key Human Resources positions.
3. Activate 80/20 actions for priority target groups: women leaders, older adults, and people with disabilities.
4. Include women on short lists for senior positions.
5. Monitor and support people with verified disabilities when needed.

**6. Promote a culture of learning that becomes a competitive advantage for the Bank's cultural transformation and the professional development of employees, through continuous training and the generation of a training ecosystem.**

### RISK OR THREAT

Employees do not have the tools to perform with excellence.

Divisions have difficulty reaching corporate goals due to lack of team skills.

### MITIGATION PLAN

1. Evaluation of employee satisfaction with the training opportunities they receive.
2. Employee evaluation of the relevance of the training opportunities they receive for the position they hold.
3. Promotion and management of self-training.

## COMMITMENTS

1. **Take into account compliance with the labor rights of external employees when making decisions on service contracts, in accordance with the limits established by law.**

### RISK OR THREAT

External workers report their employer companies for noncompliance with labor laws.

### MITIGATION PLAN

Require the absence of fines or serious penalties for labor noncompliance as a condition for contracting new services.

When renewing service contracts, make adjustments for suppliers with a history of serious noncompliance in the last 12 months.

Implement formal recognition of suppliers with exemplary labor compliance in the last 12 months.

Ask all current suppliers and tender participants for an affidavit certifying that they are aware of Bci's Human Rights Policy.

2. **Promote safe and healthy working conditions for employees of external contractors that provide services on Bci's premises.**

### RISK OR THREAT

Lack of security conditions puts the health and safety of external workers at risk.

External workers report their employers for poor health and safety conditions in the workplace.

### MITIGATION PLAN

Establish goals for compliance with accident and lost-day rates for suppliers with external employees providing services for Bci.

Require the absence of fines or serious penalties for poor health and safety performance as a condition for contracting new services.

When renewing service contracts, make adjustments for suppliers with a poor health and safety performance in the last 12 months.

Implement formal recognition of suppliers with exemplary health and safety behavior in the last 12 months.

## COMMITMENTS

**3. Promote the elimination of child and forced labor in the services supplied to Bci, by requiring the hiring of persons of legal age.**

### RISK OR THREAT

Contractor companies are denounced and sanctioned for committing child and forced labor practices.

### MITIGATION PLAN

1. Prevent participation in direct award processes by suppliers with a history of child or forced labor.
2. Terminate service contracts with suppliers that are sanctioned by the authority for child or forced labor practices.
3. Ask all current suppliers and tender participants for an affidavit certifying that they are aware of Bci's Human Rights Policy.
4. Require the absence of fines or sanctions in these matters as a condition for contract renewal.

**4. Promote labor inclusion in outsourced services involving external employees working on-site at Bci.**

### RISK OR THREAT

External workers report their employer companies for discriminatory hiring practices, treatment, and/or internal processes.

### MITIGATION PLAN

1. Consider inclusion practices in the contracting and renewal of services.
2. Implement formal recognition of suppliers with outstanding labor inclusion practices in the last 12 months.

**5. Disseminate and promote education on respect for human rights in our supply chain, thus encouraging compliance with human rights due diligence among large suppliers.**

### RISK OR THREAT

Supplier company executives indicate that they are unaware of Bci's commitments regarding human rights and their responsibilities in this area.

### MITIGATION PLAN

1. Ask all current suppliers and tender participants for an affidavit certifying that they are aware of Bci's Human Rights Policy.
2. Incorporate a module on human rights due diligence in the supplier training plan.

COMMITMENTS	
<b>1. Contribute to the eradication of corruption in all its forms, including extortion and bribery.</b>	<b>RISK OR THREAT</b> The Bank and/or its customers are victims of acts of fraud or corruption committed by third parties.  Corporate executives commit acts of corruption, such as bribery of authorities.
	<b>MITIGATION PLAN</b> 1. Crime prevention training. 2. Code of Ethics training.
<b>2. Safeguard and promote the rules of free competition that ensure the right of companies and individuals to participate equally in the market.</b>	<b>RISK OR THREAT</b> The authority or consumer associations denounce anti-competitive practices by Bci.  Bci is a victim of anti-competitive practices by other financial institutions.
	<b>MITIGATION PLAN</b> Training within the framework of the Free Competition Protection Program.
<b>3. Promote financial inclusion and foster the sustainable growth of SMEs in Chile.</b>	<b>RISK OR THREAT</b> Small and medium-sized businesses claim discrimination by Bci to access financing.  SMEs that generate work and contribute to economic dynamism cannot ensure their economic sustainability due to lack of resources.
	<b>MITIGATION PLAN</b> 1. Social financing for SME customers. 2. Promote the financial and digital empowerment of small and medium-sized businesses through the Valor Pyme program.

## COMMITMENTS

### 4. Promote the United Nations Sustainable Development Goals (SDGs).

#### RISK OR THREAT

The Bank's main executives, leaders, and employees are unaware of the contribution they make through their activities to the challenges of sustainable development.

Stakeholders are unaware of the Bank's contribution to the sustainable development challenges.

#### MITIGATION PLAN

1. Align each of the programs and actions in Bci's Annual Sustainability Plan with the SDGs.
2. Support institutions and organizations that promote the SDGs.

### 5. Reduce and offset the business's environmental impacts, to help ensure a healthy and clean environment.

#### RISK OR THREAT

Community denounces bad environmental practices by Bci.

Failure to manage the Bank's environmental impacts.

#### MITIGATION PLAN

1. Be a carbon-neutral Bank by 2028.
2. Reduce energy use intensity.
3. Reduce water use intensity.
4. Zero waste to landfills.
5. Reduce the use of office paper.

### 6. Collaborate with institutions and NGOs for the promotion of human rights.

#### RISK OR THREAT

Partner charitable organizations cannot continue to operate due to lack of support.

#### MITIGATION PLAN

1. Support the Crecer Mejor Corporation (CCM).
2. Support the Enseña Chile Foundation.
3. Support the "Creators" and "Hour of Code" programs of the Kodea Foundation.
4. Support home care for the elderly (PADAM) by Hogar de Cristo.
5. Support Las Rosas Foundation.

COMMITMENTS	
<b>7. Help the most vulnerable population in national emergency situations.</b>	<b>RISK OR THREAT</b> A natural disaster or national emergency affects the operations of partner organizations and reduces the financial support they receive.  A natural disaster or national emergency jeopardizes the ability to meet the population's basic needs.
	<b>MITIGATION PLAN</b> 1. During emergency situations, support the operation of organizations that provide aid to the most vulnerable population. 2. Support the most vulnerable communities with financial contributions in addition to the annual donations mentioned earlier. 3. Act as a channel for collecting funds for campaigns orchestrated by other entities when the government decrees a State of Exception, Catastrophe, or Emergency. 4. Support the Comprehensive Care for the Elderly program of the Las Rosas Foundation.

# **ANNEXES: ADDITIONAL INFORMATION**

**—**

This division leads the Human Rights Management System at Bci and has the following responsibilities at each stage:



## Planning

.Coordinate the process of updating the Annual Human Rights Action Plans.

## Execution

.Organize and lead the annual meetings of the Human Rights Committee.

.Monitor the execution of human rights programs promoted by Bci.

## Feedback and continuous improvement

.Periodically review the Human Rights Policy, in response to changes in the business context and the Bank's strategic guidelines.

.Review complaints received by Bci for possible violations of its Human Rights Policy, to identify gaps that need to be addressed and ensure compliance with reparation commitments in proven cases.

## Communication

.Once a year, communicate Bci's human rights objectives and performance to all stakeholders through the Annual Report.

.Report the Corporation's human rights performance to the Sustainability Committee.

The Human Rights Committee meets three times a year. It is led by the Sustainability Division and is made up of representatives of the Human Resources, Business Development, Retail Banking, Corporate Purchasing, and Labor Relations divisions, as well as the Office of the Corporate Counsel. Responsibilities in the management system include the following:



## Planning

.The permanent Committee members (see Annexes) must coordinate the definition of Annual Plan commitments for their respective areas.

.Approve the initiatives that will make up the Annual Human Rights Action Plan.

## Execution

.Review progress on the execution of the programs in the Annual Plan.

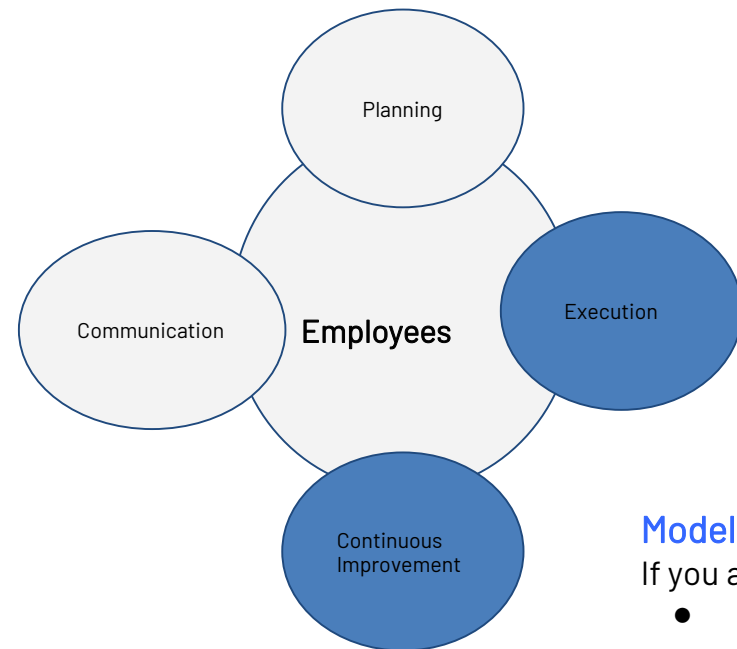
## Feedback and continuous improvement

.At the end of each year, evaluate compliance with commitments in each area and the need to improve the guidelines.

## Communication

.Approve the annual report on progress and challenges, which the Sustainability Division presents to the Sustainability Committee, and the summary that will be published in the Bank's Annual Report.

**All employees of Bci and its subsidiaries must know and respect the Bank's Human Rights Policy. Failure to comply with the Policy may expose them to disciplinary measures by the Corporation, in accordance with the current legislation and established internal procedures. Employees' responsibilities in the management system are as follows:**



## Execution

Participate in the activities and initiatives considered in the Annual Human Rights Action Plan for each area.

## Feedback and continuous improvement

Report any conduct that violates Bci's Human Rights Policy through the reporting channels provided by the Bank.

In line with the corporate Code of Ethics, when faced with any dilemma in this area, people should ask themselves the following questions and act accordingly:

## Model of Action

If you are facing any ethical dilemma, ask yourself the following questions:

- Is it true? / Does it comply with our policies? / Is it consistent with our ethical framework?
- Would it be fine if everybody did the same? / Would you be comfortable if became of public knowledge? / Your decision seem to comply with our code
- STOP! This action could have serious consequences / WAIT Seek for assistance before going forward.

This Board Committee is in charge of the administration and application of the Bci Code of Ethics. Its specific functions are to interpret the provisions of the Code, safeguard the organizational ethical culture, suggest actions to implement, and stimulate organizational learning. Within the framework of the human rights management system, the Committee has the following responsibilities:



## Feedback and continuous improvement

Analyze and resolve complaints received by the Bank for possible violations of the Human Rights Policy, in accordance with corporate procedures and the current legislation.

When a violation is found, the Ethics Committee, with advice from the Sustainability Division, must define the corresponding reparation mechanism, based on the scope and impact of the violation. In this phase, the Level-1 and/or Level-2 manager of the area or division where the violation occurred must also intervene.

This Board Committee is in charge of reviewing Bci's sustainability strategy, policies, and programs. Its objective is to ensure the Bank's contribution to the social and environmental sustainability of its stakeholders and thus to protect its corporate reputation and prestige. The committee's responsibilities in the management system are as follows:



## Communication

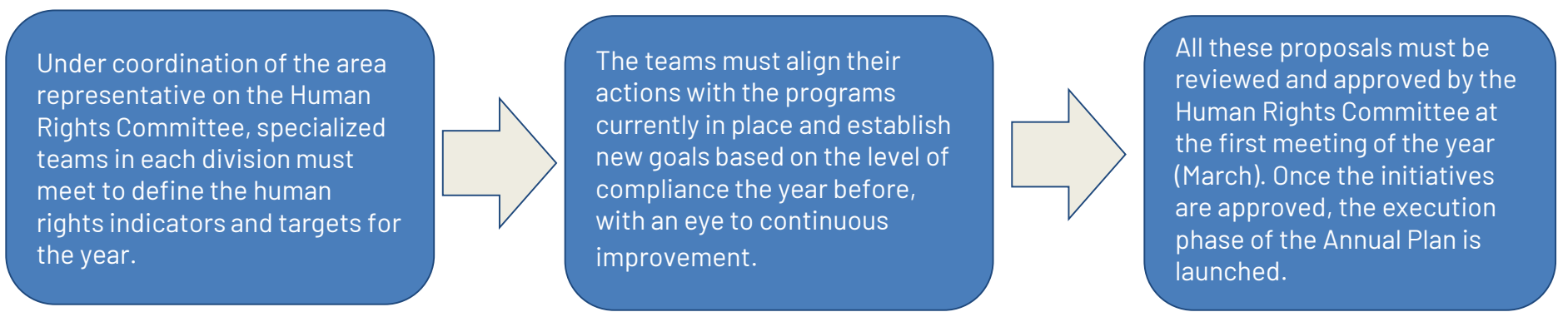
- Review and approve the Sustainability Division's report on human rights progress and challenges.

## Feedback and continuous improvement

- Based on these reports, suggest new human rights initiatives and commitments.

To guarantee human rights commitment compliance, Bci will review its Action Plan every year (or every two years).

This program, which represents a human rights due diligence system, comprises the following work stages:

A horizontal flowchart with three blue rounded rectangular boxes connected by light gray arrows pointing from left to right. The first box contains text about defining indicators and targets. The second box contains text about aligning actions with programs and establishing new goals. The third box contains text about reviewing proposals and launching the execution phase.

Under coordination of the area representative on the Human Rights Committee, specialized teams in each division must meet to define the human rights indicators and targets for the year.

The teams must align their actions with the programs currently in place and establish new goals based on the level of compliance the year before, with an eye to continuous improvement.

All these proposals must be reviewed and approved by the Human Rights Committee at the first meeting of the year (March). Once the initiatives are approved, the execution phase of the Annual Plan is launched.

Throughout the year, the Sustainability Division and the Human Rights Committee will permanently monitor compliance with the initiatives contemplated in the Action Plan. The objective of this tracking is to guarantee compliance with the commitments taken on by each area and to identify areas for improvement in terms of both execution and internal coordination. This work includes the following phases:



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graph LR; A[Continuous monitoring of compliance with the Annual Plan commitments by the Sustainability Department.] --> B[Mid-year review of progress on the plan at the Human Rights Committee's second meeting of the year (July).]; B --> C[Continuous monitoring of compliance with the Annual Plan commitments by the Sustainability Department.]; C --> D[Final review of progress on the plan at the Human Rights Committee's final meeting of the year (November).];
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Continuous monitoring of compliance with the Annual Plan commitments by the Sustainability Department.

Mid-year review of progress on the plan at the Human Rights Committee's second meeting of the year (July).

Continuous monitoring of compliance with the Annual Plan commitments by the Sustainability Department.

Final review of progress on the plan at the Human Rights Committee's final meeting of the year (November).

Bci has four Confidential Channels through which any employee can request guidance on the Corporation's human rights commitments and file complaints for possible violations of Bci's policy.

**¿Qué Hago?  
(What should I  
do?)**  
quehago@bci.cl

**Bci Te Escucha  
(Bci Listens)**  
bciteescucha@b  
ci.cl

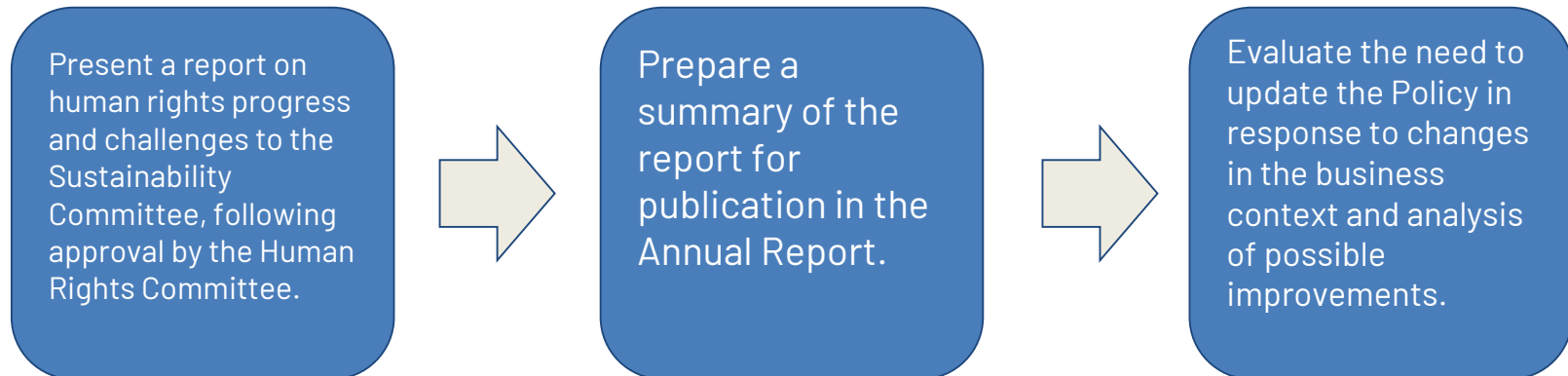
**Prevención de Riesgo  
Penal y Libre  
Competencia  
(Criminal Risk  
Prevention and Free  
Competition)**  
prevenciondel delito@  
bci.cl

**Prevención de  
Fraudes  
(Fraud  
Prevention)**  
denuncia@bci.cl

Bci also has a number of reporting platforms, consultation channels, and complaint lines for possible infractions in the areas of customer and community relations.

In the case of suppliers' human rights commitments, violations can be reported through the channels established in the Corporation's Purchasing Policy.

At the end of each year, based on compliance with the Annual Action Plan, the Sustainability Division must:



A 360-degree panoramic photograph of a lush green park. In the center, a man in a green shirt is riding a bicycle. To his left, a woman in a red top is walking. Further left, a man in a blue shirt is running. In the background, a soccer ball is visible on the grass. On the right side of the panorama, a woman in a red top is walking, and a man in a green shirt is running. In the foreground, a man in a red shirt is sitting on the grass, looking towards the camera. The sky is blue with some clouds.

# Bci Human Rights

## Policy and Management System