

BPI HUMAN RIGHTS POLICY

INTRODUCTION

BPI is committed to respecting and protecting the basic human rights of all its stakeholders, including, but not limited to, its clients, employees, suppliers, and service providers. As such, BPI has established a Human Rights Policy affirming the Bank's responsibility to integrate human rights principles into its operations, business decisions, and stakeholder relationships.

BPI's Human Rights Policy aligns the Bank's existing internal standards with recognized national and international human rights frameworks, including the Universal Declaration of Human Rights (UDHR), Article III of the Philippine Constitution, and UN Global Compact's (UNGC) Human Rights and Labor Principles.

SCOPE

BPI's Human Rights Policy shall be upheld by all directors, officers, and employees of the Bank, as well as third party service providers in the performance of their responsibilities and conduct of their respective businesses.

OBJECTIVES

- I. To affirm the Bank's commitment to align with, and be guided by, international and national standards and frameworks as outlined above.
- II. To establish guiding principles for the Bank in its treatment of clients, employees, suppliers and other stakeholders in line with basic human rights.
- III. To promote awareness of, and shared responsibility for, human rights across the organization and its supply chain.

ALIGNMENT WITH EXISTING POLICIES

The principles and expectations outlined in this Human Rights Policy are supported by existing Bank policies and governance frameworks. These include, but are not limited to, policies on [business conduct and ethics](#), recruitment, employee relations, physical security, [third-party engagements](#), [financial consumer protection](#), [data privacy](#), [whistleblowing](#), credit risk management, [responsible lending](#), and [sustainability](#).

BPI's Human Rights Policy serves as a unifying framework that reinforces these standards, ensuring a consistent and principled approach to human rights across all aspects of the Bank's operations.

POLICY STATEMENTS

I. GENERAL PRINCIPLES

The Bank complies with all applicable laws, rules, and regulations. In situations where legal restrictions apply, the Bank acts in accordance with such laws while continuing to uphold its human rights commitments to the fullest extent possible.

A. NON-DISCRIMINATION AND EQUAL OPPORTUNITY

1. Bank employees treat all its stakeholders with equal dignity, respect and fairness, regardless of race, ethnicity, sex, gender, skin color, religion, citizenship, political view, social background, ancestry, marital status, medical condition, disability, age, or other characteristics protected by law. The Bank integrates in its operations treatment without bias, upholding the principle of non-discrimination at all times.
 - a. Decisions regarding the provision of products and services shall be based on clear and objective criteria aligned with legal and regulatory requirements. These shall, among others, include the following:
 - Strict compliance with applicable laws or regulatory restrictions, such as but not limited to, sanctions screening and money laundering and terrorist financing prevention program, which prevents the Bank from servicing a sanctioned person or transaction;
 - Outcomes of a proper Client Suitability Assessment (CSA), where the client's profile shall be matched with the intended use or risk level of a product or service; or
 - Credit decisions made where standard credit evaluation criteria are observed.
 - b. Similarly, the Bank implements fair and inclusive employment practices. Employment decisions are based on objective qualifications and job requirements, such as:
 - Strict compliance with applicable laws that govern eligibility for employment; or
 - Alignment between an applicant's educational background or work experience and the requirements of the position.
 - c. The Bank promotes equitable and balanced sourcing practices, wherever possible. Supplier/vendor selection is based on legitimate business needs and relevant qualifications, subject to:
 - Compliance with restrictions on contracting and subcontracting arrangements under applicable laws or regulations; or
 - Matching the vendor's expertise or experience and the Bank's requirements, as assessed in line with supplier accreditation standards
 - d. In support of the Bank's sustainability and inclusion objectives, the Bank shall also seek to engage diverse suppliers, including small and medium enterprises (SMEs), women-led businesses, and local providers, whenever possible, provided they meet quality, risk, and performance standards.

B. SAFETY

The Bank maintains a safe and secure environment across all Bank-owned and leased facilities. The Bank implements appropriate protocols to protect the safety and security of all stakeholders while within or around the Bank's premises and facilities.

C. LABOR RIGHTS AND STANDARDS

1. The Bank maintains a zero-tolerance policy for child and forced labor across all operations and expects the same standard from all suppliers and business partners. Any breach of this policy may result in termination of business relationships.
2. The Bank implements fair compensation practices for employees, consistent with applicable labor laws and prevailing market standards. The Bank likewise commits to meet its contractual obligations to its third-party service providers.
3. Employees who work beyond regular hours are appropriately compensated in accordance with applicable labor regulations and internal standards.
4. The Bank upholds every employee's right to freedom of association, including the right to organize, join, or form unions. The Bank supports open dialogue and constructive labor relations, and recognizes collective bargaining as a key tool for promoting fairness, resolving grievances, and maintaining workplace harmony.

D. EFFECTIVE REMEDY

The Bank ensures that clients have access to clear, fair, and efficient [channels](#) for raising concerns and resolving issues related to their financial transactions.

E. FREEDOM OF EXPRESSION

The Bank fosters a culture of openness and accountability by encouraging employees and other stakeholders to express their views and raise concerns in good faith. Employees are assured of confidentiality and protection against retaliation when reporting through authorized channels. The Bank maintains the integrity of the reporting process such that any misuse, or knowingly submitting false or malicious claims, is subject to appropriate disciplinary measures.

F. DATA PRIVACY

The Bank values the privacy of its stakeholders and implements robust and comprehensive data protection practices that ensure personal and sensitive information are handled with the highest standards of confidentiality, security, and integrity.

G. SUSTAINABLE FINANCE AND RESPONSIBLE BANKING

- a. In support of human rights and sustainable development, the Bank directs its lending activities away from sectors listed in its [Exclusion Standards based on Environmental and Social \(E&S\) Considerations](#).
- b. The Bank commits to financial inclusion by making accessible products and services tailor-fit to the needs of underserved and underbanked sectors, including, but not limited to, Small and Medium Enterprises (SMEs), Self-Employed Micro-Entrepreneurs (SEMEs), informal workers, and low-salaried individuals.

RESPONSIBILITIES

The effective implementation of the Bank's Human Rights Policy is a shared responsibility that is guided by clear accountability at all levels of the organization, with the tone set from the top.

The Board of Directors shall provide strategic direction and oversight, ensuring that the Bank's commitment to upholding human rights is embedded in its corporate governance and risk management frameworks. Following Board approval, relevant Board-level committees shall have oversight of the implementation of human rights principles in a manner consistent with their respective mandates, as part of their broader responsibility for sustainability and ethical conduct.

The Bank's Senior Management shall be responsible for implementing the Policy across the organization, ensuring that internal policies, standards, and operating procedures remain aligned with the Bank's human rights commitments, and that these principles are reflected in the Bank's organizational structure, business decisions, day-to-day operations, partnerships, and stakeholder interactions.

As the Bank deals with each stakeholder in the conduct of BPI's business, each respective group in charge of their respective functions shall uphold the human rights principles enumerated herewith.

All employees are expected to uphold the Bank's Human Rights Policy in the performance of their duties. They shall conduct themselves with fairness, respect, and accountability in all interactions, reflecting the Bank's core values and ethical standards in both internal and external engagements.

All of these responsibilities shall be carried out in conjunction with those defined in related Bank policies and governance frameworks.