

## National Bank Human Rights Statement

Respect for human rights and freedoms is among National Bank's fundamental values. We're committed to creating and maintaining a safe, healthy work environment that is free from all forms of discrimination, harassment and intimidation.

### Overview

National Bank subscribes to the values set out in the Canadian Charter of Rights and Freedoms and internationally recognized standards:

- > United Nations Universal Declaration of Human Rights
- > International Labour Organization Declaration
- > United Nations Guiding Principles on Business and Human Rights
- > United Nations Sustainable Development Goals

This Statement sets out our commitments and expectations and outlines how we apply our principles and standards in our day-to-day operations and relationships with various stakeholders, with regard to our various roles:

- > Employer with thousands of employees all around the world
- > Provider of products and services to our clients
- > Corporate citizen in communities
- > Partner of local and international organizations that promote human rights

### Principles and commitments

- > Respect, promote and protect human rights in all our sectors of activity
- > Foster employee empowerment and accountability to discourage actions contrary to this Human Rights Statement
- > Exercise due diligence when it comes to human rights and require our business partners and stakeholders to do the same
- > Promote financial security by providing tools and raising awareness among clients and employees of the importance of adopting the right behaviours, especially with regard to personal information
- > Openly and transparently communicate this statement and our human rights-related activities
- > Support organizations committed to promoting human rights

## Codes

The Bank's Code of Conduct and Ethics states that employees, directors and officers must comply with the applicable laws, regardless of the jurisdiction in which they are located. The Code also contains provisions ensuring people are treated with respect, civility and dignity, and forbids any form of discrimination, harassment, or physical or psychological violence. All employees, directors and officers must attest annually that they comply with the Code and regularly receive training on this subject.

All suppliers of goods and services who want to build or maintain a business relationship with us must comply with our Supplier Code of Conduct. This Code outlines our expectations of suppliers with regard to responsible business practices and requires them to take human rights into consideration in their activities and throughout their supply chain. We can check that suppliers are applying the Code and take corrective measures in situations of non-compliance.

We take action in cases of non-compliance with our policies and practices and have reporting mechanisms and internal recourse measures in place for employees and other stakeholders who wish to express their concerns confidentially, without risk of reprisals.

## Scope

**This Statement applies to activities and decisions across National Bank and its subsidiaries. When local legislation diverges from our directives, the following guidelines apply:**

- > If local legislation is stricter, it applies in addition to the Bank's policies.
- > If local legislation is less strict, the Bank's policies apply in addition to this legislation. We undertake to do everything in our power to promote human rights.
- > If there is a conflict, we act in accordance with local legislation and undertake to do everything in our power to promote human rights.

## Inclusion and diversity

At the Bank, diversity and inclusion are an integral part of our corporate culture. In addition to complying with Canada's *Employment Equity Act*, we value diversity in all forms and do not tolerate any discrimination based on any grounds, such as race, colour, gender, language, religion, political or other opinion, ethnic, national or social origin, wealth, birth or other factors. This principle also applies to any form of harassment or intimidation.

We see diversity as a great source of wealth and are proud to have employees in different age groups, from different origins and with different sexual orientations and gender identities. Our employees reflect the diversity of the communities we serve and support our values of openness and inclusion.

Our commitment to offering an environment that is open and respectful of individual differences is expressed through a number of initiatives:

- > Partnerships and donations and sponsorships program
- > Employee volunteer program
- > Accommodation program for clients and employees
- > Program for clients who are newcomers to Canada
- > Internal employee networks

See the [Social Responsibility](#) section of our website at [nbc.ca](http://nbc.ca) for a full list of our initiatives.

### Gender equality

The Bank promotes the professional development and advancement of women within the organization and in the community. This commitment is expressed through concrete initiatives, such as our internal women's leadership network and our partnerships with organizations that help advance women.

See the [Social Responsibility](#) section of our website at [nbc.ca](http://nbc.ca) for details of these initiatives. You'll also find information on the representation of women at the Bank.

### Actions against slavery

The Bank's [Commitment to the Fight Against Slavery](#) sets out our commitment to fighting slavery and human trafficking through our activities and relationships with partners. We subscribe to the United Nations Universal Declaration of Human Rights and the International Labour Organization Declaration (notably Conventions 138 and 182 on child labour) and do not tolerate child labour.

### Actions against financial crime

The Bank has rolled out a program to fight against money laundering and terrorist financing, which includes provisions aimed at preventing terrorist financing, corruption and non-compliance with international economic sanctions. This program is intended to limit the risk that our products and services will be used for criminal purposes, including slavery and human trafficking.

### Freedom of expression and opinion

The Bank keeps up an ongoing dialogue with employees, getting them involved in business decisions and discussions and requesting their feedback on various topics. Employees can express themselves through regular meetings, weekly and annual surveys, and by using collaboration tools that promote transparency and encourage them to share opinions, ideas and feedback.

Clients can share their comments and suggestions via a number of channels: at a branch, by phone, by email or on social media. We use satisfaction surveys, focus groups and online panels to obtain client feedback and help us make client-centric strategic decisions.

### Freedom of association and collective bargaining

The Bank encourages open dialogue with employees and aims to offer them a fair and equitable work environment where they can communicate their opinion and concerns directly, without needing to go through a representative.

### Health, safety and well-being

Health is a priority for the Bank. That's why we encourage employees to take charge of their physical and psychological health by giving them information, tools and resources to help them adopt a healthy lifestyle.

Our Employee and Family Assistance Program (EFAP) offers completely confidential professional support for employees and their families who are going through difficult times. In addition to this service, the EFAP provides specialized services to assist managers with emotionally difficult and delicate situations related to their management role.

We give our employees the opportunity to work remotely and promote work-life balance. In 1980, we became the first company in Quebec to offer employees a daycare facility at work. We're proud to continue to support employees who are parents.

We have taken measures to provide a safe work environment. All workplaces are regularly inspected and a trained health and safety representative is available to answer employees' questions. Our health and safety committees and health and safety orientation committee are in charge of implementing and maintaining regulations to ensure physical and mental health and safety.

We are adapting our branches, points of service and offices to provide modern, high-tech spaces that meet sustainable development and universal accessibility standards.

### Access to services

The Bank has rolled out measures to improve access to financial services and meet the specific needs of clients, including underbanked, unbanked and poorly serviced individuals.

No-fee bank accounts linked to a specific package are offered to certain clients identified by the Government of Canada as being financially vulnerable (seniors, persons with disabilities, children, full-time students). A monthly discount applicable to most banking packages is offered to certain clients, such as people under 18 years old, full-time students between 18 and 24 years old and people over 60 years old. Our financing policies take into account clients' debt repayment capacity. Mechanisms are in place to assist clients who are having trouble making their payments.

### Financial literacy

The Bank believes that financial education is essential to financial health. That's why we offer a wide range of resources and tools to help our clients carefully plan their financial needs based on their projects and life stage.

Our website at [nbc.ca](https://www.nbc.ca) provides access to a wealth of articles, videos and files with helpful advice on various aspects of managing personal finances.

Through our partnerships with different organizations, we support the creation of financial education initiatives targeting various groups, including students and newcomers to Canada.

## Reporting

The Bank's Code of Conduct and Ethics states that employees, officers and directors must report any behaviour that contravenes the Code or any of our other policies, permanent instructions, procedures and standards, including human rights violations. This obligation also applies to interns, contract employees, consultants, representatives, mandataries and third parties that have a business relationship with us.

Employees must report any infractions to their manager, their manager's manager or one of the entities set out in the Code. To maintain anonymity, employees can communicate with the Employee Ombudsman's Office. Any person who, in good faith, reports a real or potential breach will not be subjected to reprisals.

Clients can communicate complaints related to their business relationship with us via our various service channels. Employees are encouraged to quickly handle and resolve complaints expressed.

The Office of the Ombudsman for Clients offers clients an independent and impartial recourse for complaints not settled to their satisfaction. Each file is reviewed in accordance with legislation, regulations and industry best practices.

Each year, the Office of the Ombudsman publishes data on the complaints handled over the past year. This information, as well as the Charter of the Office of the Ombudsman for Clients, is available on our website at [nbc.ca/complaint-settlement](https://nbc.ca/complaint-settlement).

## Due diligence

Identifying, assessing and overseeing human rights risks is integral to the Bank's structure, policies and processes. We also perform checks to make sure our practices are effective.