



## **HUMAN RIGHTS POLICY**

**Hibernia Real Estate Group Limited**

**March 2025**

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## **1. Introduction**

Hibernia Real Estate Group Limited and all Hibernia Real Estate Group entities (“Hibernia”) are committed to operating with the highest ethical standards. Respecting human rights is fundamental to our business and integrated throughout our decision making, governance and operations. Our commitment to respecting human rights is consistent with our policy framework which seeks to ensure the well-being and safety of employees, mitigate the impact of our operations on the environment, uphold strong governance practices and being good corporate citizens in the communities in which we operate.

This Human Rights Policy (the “Policy”) applies to all employees of Hibernia and all its controlled subsidiaries, and the Board of Directors of Hibernia.

We expect all third parties with whom Hibernia has a business relationship to adhere to human rights standards aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and Organization for Economic Co-operation and Development (OECD) Guidelines.

## **2. Our Commitment to Respect Human Rights**

The purpose of this Policy is to set out our approach to respecting fundamental human rights, which we define by reference to the United Nations Universal Declaration of Human Rights, International Bill of Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights at Work. We seek to identify and prevent adverse human rights impacts within our business and supply chains and to act in a way that aligns with international human rights standards, including:

- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises (MNEs)

We seek to treat our employees, occupiers, suppliers, and the communities in which we operate with dignity and in a manner that respects human rights. This includes a commitment to the elimination of forced or compulsory labour; the abolition of child labour; the right to a safe and healthy workplace free of discrimination and harassment, where people are treated fairly irrespective of race, sex, nationality, ethnicity, language, religion, sexual orientation, gender identity and expression, employment and occupation or any other status; recognising the rights to freedom of association and collective bargaining; and the provision of wages that meet or exceed those required by law.

Hibernia is committed to implementing human rights-based approach to vendor sourcing and procurement which is aligned to the OECD Guidelines including implementing human rights due diligence across all our business areas.

Hibernia is committed to complying with the laws and regulations of all countries where we operate. Hibernia is based in Dublin and only operates in Ireland. We apply the ‘most stringent standard’ principle, ensuring that where local laws fall short or undermine human rights, we adhere to the highest international standards, prioritising human dignity and fundamental rights.

### **3. Our Approach**

We seek to identify, prevent and mitigate adverse human rights impacts in our business activities and value chain through the implementation of this Policy and the support of the following programmes:

- **Code of Business Conduct and Ethics:** Our Code of Business Conduct and Ethics (“Code of Conduct”) reinforces and supports our commitment to respect human rights. Our Code of Conduct describes our commitment to conducting business in an ethical and responsible manner including respecting human rights.
- **Counterparty expectations:** We communicate our expectations to counterparties and conduct appropriate due diligence. Our Supplier Code of Conduct sets our expectations that our vendors respect all internationally recognized human rights and maintain processes to identify and prevent adverse human rights impacts that could arise from their own or their supply chain’s operations, in line with the international standards. We provide an ethics reporting hotline for anonymous reporting of any concerns or potential violations.
- **Third Party Due Diligence:** Our Third Party Due Diligence processes support the integration of human rights considerations into our procurement process.
- **Community and stakeholder engagement:** We seek to proactively engage with stakeholders including those in our value chain, our own employees and the local communities where we operate and strive to create shared value. Through our engagement and local assessments, we seek to identify, avoid, prevent, and mitigate potential human rights risks and impacts.

### **4. Grievances and Access to Remedy**

We provide appropriate channels for our employees, vendors and other third parties to support reporting and recording of grievances raised, including any that are related to human rights.

We maintain our confidential and anonymous whistleblowing hotline. The hotline is hosted by an independent third party and is available to our employees, vendors, and other third parties. Details can be found in Appendix 1.

All grievances reported through these channels are carefully reviewed and, where appropriate, responded to. In the event that we identify that we have caused or contributed to an adverse human rights impact, we will take appropriate action to mitigate or remedy the impact. When doing so we will consider all the relevant circumstances of the case including, but not limited to (i) the extent to which Hibernia has directly caused or contributed to the impact, (ii) Hibernia’s ability to influence the mitigation or remedy of the impact, and (iii) any wider consequences which may flow from Hibernia’s action.

More detail on our grievance process can be found in our Whistleblowing Policy which is available on our website.

### **5. Integration with Other Policies and Procedures**

Our human rights expectations are integrated within Hibernia's policies and procedures, including but not limited to:

- Code of Business Conduct and Ethics
- Supplier Code of Conduct
- Anti-Bribery and Anti-Corruption Policy and Programme
- Whistleblowing Policy
- Positive Work Environment Policy
- Sustainability Policy
- Health & Safety Policy

#### **6. Reporting**

We are committed to reporting to the public on our Human Rights impacts and due diligence.

#### **7. Governance of the Policy**

The responsibility for the management of human rights issues extends across all levels of Hibernia and human rights matters are overseen by the Senior Management Team and the Risk and Compliance Committee. The Risk and Compliance team is responsible for the implementation of the Human Rights Policy.

This Policy is reviewed on a periodic basis, and at minimum on a biennial basis, and is approved by the Chief Executive of Hibernia.

## **8. Appendix 1: Key Contacts and Reporting Hotline**

### **Reporting Hotline**

To access the reporting hotline please complete the two-stage dialling process and then follow instructions:

- Firstly dial: 1800 550 000
- Then: 800 603 2869

### **Key Contacts**

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