

Human Rights Charter

1. Introduction

1.1 Purpose

At PTSB ('the Bank'), our purpose is to work together to build trust with our customers and communities.

Central to that purpose is a commitment to ensuring that we respect the human rights of every individual. We acknowledge our responsibility to respect human rights overall as set out in the International Bill of Human Rights and the eight fundamental conventions on which the United Nations Guiding Principles on Business and Human Rights are based.

The Bank's Human Rights Charter is in place to support us in meeting all relevant human rights legislation in the Republic of Ireland. It ensures that our commitment to human rights is embedded in the culture and values of the Bank and is reflected in the policies we have in place and the actions we take toward our employees, customers, suppliers and the communities.

We have considered this Human Rights Charter through guidelines and principles aligned to international best practice including, the United Nations Guiding Principles on Business and Human Rights and the Organisation for Economic Co-operation and Development's (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct, which includes a chapter on Human Rights.

In addition, and where practicable, the Bank works to align ourselves to the provisions of international treaties and other internationally accepted declarations and principles intended to protect human rights.

1.2 Scope

This Charter applies to:

- **All Employees**¹ who work directly for PTSB or provide third party services to the Bank. This includes permanent employees, fixed-term employees, officers, consultants, contractors, interns, casual workers, temporary agency employees, work experience students, directors, and those providing an outsourced service.
- **Our Customers** whom we serve and the Small and Medium-sized Enterprises (SMEs) that we enter into business relationships with. We insist that all of our business activities are conducted lawfully, sustainably and above all, ethically.
- **Our Suppliers**² with whom we work closely to ensure that they have systems and policies in place that align with the expectations set out within this Charter.
- **The Communities** in which we operate and the impact of the Bank's activities on wider society.

1.3 Guiding Principles

To support us in conducting a mapping of potential human rights impacts, the Charter follows the approach recommended in the UN Global Compact's *A Guide for Business: How to Develop a Human Rights Policy* and is informed by the Business for Social Responsibility's (BSR) guidance on key areas of focus for the financial sector.³

The Bank does not tolerate corruption, discrimination, harassment, child labour, forced labour, or slavery in any form. We are committed to creating an inclusive, safe and ethical workplace, to always treating our

¹ Employees are defined as individuals under a direct contract of employment in the Bank (permanent and fixed-term contract employees). Non-Employees: PTSB considers non-employees to be those that do not have a direct contract of employment with the Bank. This includes third party advisory services, contractors, agency partners and self-employed individuals. Employees and non-employees as defined are included within the scope of this Charter.

² The term 'Supplier' refers to suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do, or seek to do, business with the Bank.

³ Business for Social Responsibility (2017) '10 Human Rights Priorities for the Financial Sector' ([10 Human Rights Priorities for the Financial Sector | Primers | Sustainable Business Network and Consultancy | BSR](#)).

customers fairly and with respect and to working collaboratively with our suppliers, ensuring that they meet the minimum standards we expect of all third parties.

2. Priority Areas of Focus on Human Rights

Using the UN Global Compact’s Human Rights Policy Guide for Business and the BSR’s financial sector guidance, the mapping of potential human rights impacts identified eight material human rights focus areas for PTSB.

2.1 Eight Human Rights Areas of Focus

While the BSR outlines ten priority areas, we have determined the following eight as being material to PTSB.⁴

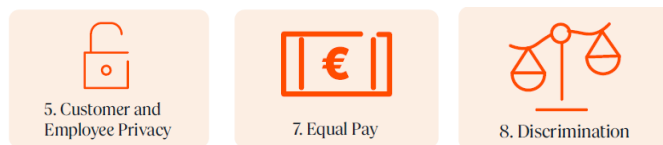


2.2 Key Stakeholders

The following sections provide an overview of the Bank’s commitment to mitigate against possible human rights infringements for our employees, our customers, our suppliers and our communities across each of the eight priority areas identified.

2.2.1 Our Employees

The Bank recognises its responsibility to respect the human rights of our Employees. Aligned to the BSR’s guidance, our mapping exercise has identified **three key focus areas** that guide how we work to protect our Employees.



Applying these areas of focus to protect our employees.

Protecting Employee Privacy

- Uphold and promote the responsible, ethical, and lawful use of personal data, ensuring every employee’s right to privacy is protected in accordance with the EU Charter of Fundamental Rights and the General Data Protection Regulation (GDPR). All colleagues are expected to adhere to the Bank’s Data Protection Policy and our Code of Ethics, which set out our clear standards of conduct and outline

⁴ The two priority areas that have been deemed immaterial for PTSB include Large-Scale Infrastructure and Land Developments and Commodities Investing.

the consequences of non-compliance, thereby encouraging a culture of integrity, accountability, and respect for human rights across the organisation.

Ensuring Equal Pay

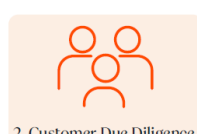
- When considering matters relating to pay, it is important to emphasise that a core principle of PTSB's approach to Pay and Reward is ensuring that all employees, regardless of gender, age or social or ethnic background are remunerated fairly and that no differentiation exists in the pay of any individual as a result of any of those factors.
- The Bank's approach is founded on the provision of equal pay for all for equal work, or work of equal value, as established with reference to individual market remuneration benchmarks determined with reference to gender-neutral job descriptions and role profiles and via the use of salary ranges.
- Our approach focusses on how the Bank attracts, engages and retains staff.
- Our Remuneration Policy and each pay, and reward element therein, is as transparent, simple and as clear as is possible.
- We tailor different pay and reward elements, and the combination of these elements, for individual business units, as appropriate (one size does not fit all).
- We apply separate and specific oversight for Control Functions (CFs), ensuring the highest standards are achieved, and that the pay and reward offerings do not compromise business objectives and independence.

Preventing Discrimination

- Respect the human rights of employees and comply with all relevant legislation, regulations and directives in the countries and communities in which we operate.
- Commit to treat all employees fairly and not discriminate in hiring, compensation, access to training, promotion, termination or retirement or on any other grounds where discrimination is prohibited under local law.
- Ensure that no child and forced labour will take place.
- Commit to providing safe, secure and healthy working conditions, and to comply with all relevant health and safety laws and regulations applicable to our locations (including home workplaces), and to operate in a manner that is safe.
- Recognise our colleagues right to freedom of association and to participate constructively in dialogue with our trade union partners.
- Focus on helping employees work-life balance, including the right to disconnect.
- Respecting and promoting diversity and inclusion and effective equal opportunities as laid out in PTSB's Equality through Diversity and Inclusion Charter.
- Ensure employees' working hours and pay rates comply with national laws and industry standards.
- Ensure that employees' total worked hours shall not exceed the maximum allowable under the Working Time Act.
- Ensure all employees' overtime is voluntary and compensated in accordance with applicable policies.
- Support and promote the health and safety of all our employees, in accordance with the Safety, Health and Welfare at Work Act, 2005 and, in so far as is reasonably practicable, provide a safe and healthy work environment for our colleagues.

2.2.2 Our Customers

The Bank recognises its responsibility to respect the human rights of our Customers. Aligned to the BSR's guidance, our mapping exercise has identified **four key focus areas** that guide how we work to protect our Customers.



In line with the expectations set out within PTSB's policies, procedures and all relevant legislation the Bank is committed to:

Preventing Discrimination in Lending Policies

- Ensure that no individual faces discrimination on any grounds prohibited by local law or relevant regulations.
- Ensure through our product assurance team that we have an adequate knowledge of our customers, their needs and full life cycle product performance, thus mitigating the risk of generating negative impacts on human rights caused by our products and/or services.
- Endeavour to always do the best for our customers, and where errors are made, to handle them in line with the Bank's policies and procedures.
- Commit to providing customers with safe and secure banking locations, and to comply with all relevant health and safety laws and regulations applicable to the location.

Ensuring Customer Due Diligence

- Avoid causing, financing or contributing to any business activity which the Bank deem to contribute to irreversible environmental and/or social harm. Avoid situations which may result in conflicts of interests and never access or process any banking transaction either for ourselves or for a person with whom we have a personal relationship and do not give, offer or accept any gift/benefit or hospitality which may compromise our customers, the bank, or ourselves.

Guarding Against Bribery and Corruption

- Implement our Anti-Bribery and Corruption Policies fully, including our Market Abuse Regulations.
- Ensure we have robust processes for managing organisational and personal conflicts with customers and our communities.

Protecting Customer Privacy

Respect the privacy of our customers and treat their personal information with the highest standards of confidentiality and care. Access to or disclosure of customer data is strictly limited to authorised personnel and permitted only where legally required or explicitly consented to by the customer. These principles are embedded in our Data Protection Policy, which sets out the safeguards we apply to ensure compliance, transparency, and accountability in all data processing activities. Should a breach occur, the Bank has established procedures to escalate the matter to the Data Protection Commission.

2.2.3 Our Suppliers

The Bank recognises its responsibility to respect the human rights of the suppliers we work with. Aligned to the BSR's guidance, our mapping exercise has identified **one key focus area** that guides how we work to protect our Suppliers.



Focusing on Supply Chains and Modern Slavery/Human Trafficking

The Bank's Sustainable Supplier Charter is aligned to ISO 20400 and has a dedicated section on Human Rights which outlines the minimum standards we expect of our suppliers:

- Ensure respect for all employees while complying with applicable laws and legislation in the jurisdiction in which they operate.
- Prohibit child labour.
- Prohibit forced or compulsory labour, and/or labour held under slavery or servitude.
- Ensure wages meet the legally binding minimum wage in the countries in which they operate.

- Ensure working hours and overtime are in accordance with local regulation and industry practice.
- Prohibit mental, physical and verbal abuse, and put in place procedures to address instances that may occur.

2.2.4 Our Communities

The Bank recognises its responsibility to respect the human rights of those in the communities in which we operate. The Bank has in place policies and frameworks to ensure that the Bank meets all human rights legislation in Ireland and to ensure we work with partners in a responsible manner to meet the needs of the communities we serve.

Aligned to the BSR's guidance, our mapping exercise has identified **three key focus areas** that guide how we work to protect our Communities.



Engaging in Sector Due Diligence

- Monitor and implement our defined list of Excluded Business Activities, which the Bank deem to contribute to irreversible environmental and/or social harm to society. This includes Non-renewable energy (e.g. extraction of gas, oil coal etc.), unnecessary deforestation, sale or manufacture of fire-arms/weapons and adult entertainments.
- Ensure responsible business practices through implementation of our Sustainability Strategy 2025 - 2027.
- Refrain or cease dealing with businesses which we have reason to believe are acting illegally.

Guarding Against Bribery and Corruption

- Implement our Anti-Bribery and Corruption Policies fully, including our Market Abuse Regulations.
- Ensure we have robust processes for managing organisational and personal conflicts with customers and our communities.

Preventing Discrimination

- Ensure that no individual faces discrimination on any grounds prohibited by local law or relevant regulations.

3. Human Rights Risk Awareness and Mitigation

To mitigate against human rights risk, or violations that may occur, the Bank has comprehensive due diligence procedures in place. These policies, procedures and codes support us in meeting all relevant human rights legislation in the Republic of Ireland and include a suite of reporting mechanisms through our Speak Freely channels.

3.1 Our Employees

The Bank has in place a Dignity and Respect Code and Equality through Diversity and Inclusion Charter. The Code and the Charter focus on the prevention of discrimination, the provision of equal opportunities and state that employees should be treated with dignity and respect in the workplace.

The Bank's Colleague Conduct Policy establishes the requirements for the effective management of appropriate behaviours within the Bank. Procedures are in place for dealing with reported human rights allegations and instances to ensure they are addressed. Through the Bank's Code of Ethics, the standards expected for all colleagues in relation to our dealings with each other, our customers, suppliers and our communities have been set out. This involves recognising the risks associated with possible violations to

our colleagues' human rights and ensuring effective controls are in place to mitigate these risks. Controls are tested periodically to ensure effectiveness and adequacy.

To support, PTSB has implemented a Diversity, Equity and Inclusion (DEI) Strategy which involves ensuring DEI has been considered for all HR processes and procedures from creation through to on-going maintenance. The Bank has worked to create a culture where colleagues feel safe to report any concerns through our Speak Freely Procedure.

3.2 Our Customers

PTSB is committed to understanding the needs of our customers and to ensuring that the products and services we provide allow all people, including those who may be in vulnerable circumstances or underrepresented, equal opportunity to access them. The Bank has in place a Dignity and Respect Code and Equality through Diversity and Inclusion Charter. The Code and the Charter focus on the prevention of discrimination, the provision of equal opportunities and ensure that individuals are treated with dignity and respect, including our customers.

In addition, the Bank has in place a set of Customer in Vulnerable Circumstances Principles and an associated Policy to enable us to remove barriers, meet the needs of customers who may require additional support and care, and to provide guidance and support to our colleagues by outlining the services available and providing detail in relation to how they can be accessed. In addition, the Bank has a Customer in Vulnerable Circumstances Booking Service through our Enhanced Customer Support Team.

Targeted training is delivered to customer facing and non-customer facing teams including Enhanced Customer Support, Assisted Decision Making and European Accessibility Act training, comprehensive grief training for our Bereavement Services colleagues and training packs raising awareness of domestic and financial abuse. Equipping employees with the knowledge and skills to identify and respond to issues such as vulnerability, bereavement, and abuse, helps to prevent discrimination, support equal access to services, and safeguard individuals from potential human rights violations.

3.3 Our Suppliers

In our efforts to assess and ensure human rights and to prevent and mitigate against human rights violations in our supply chain, the Bank has in place a Sustainable Supplier Charter aligned to ISO 20400 that outlines our expectations of suppliers, including those related to human rights.

In addition to the Bank's Sustainable Supplier Charter, we hold membership to the Financial Supplier Qualification System (FSQS), an online platform where suppliers submit their compliance data and information relating to their organisation, allowing us to have a consistent view of our suppliers and facilitating due diligence activities to ensure they meet our minimum standards.

We are committed to working alongside our suppliers to ensure compliance with our responsibilities in relation to human rights.

3.4 Our Communities

With 98 branches nationwide, PTSB is a local community bank whose purpose is to work together to build trust with our customers and communities.

The Bank's Business Lending Credit Policy provides guidance on minimum standards that must be met and applied to all aspects of Business Lending. It states that finance must not be provided to Borrowers that engage in a list of Excluded Business Activities which the Bank deem to contribute to irreversible environmental and/or social harm to society, this includes areas such as non-renewable energy (for example, extraction of gas, oil or coal), unnecessary deforestation or the sale of weapons. Meeting the requirements set out in the Policy is a condition of doing business with PTSB.

In addition, the Bank has policies in place, including our Community Policy, Community Fund Constitution and Employee Volunteering Policy that set out the expectations of our colleagues, when engaging in community initiatives.

4. How to Raise a Concern (Grievance Mechanisms)

PTSB is committed to creating a psychologically safe culture where all of the Bank's stakeholders can speak freely on any concerns they have. We are committed to ensuring all our policies, procedures, products and services align to our commitment that Human Rights is embedded in the culture and the values of the bank.

If for any reason we fall short of this commitment, anyone can raise a concern through either our Speak Freely Procedure or Protected Disclosures Procedure.

Speak Freely

Our Speak Freely Procedure protects colleagues who wish to raise a concern or to make a protected disclosure, relating to actual or potential wrongdoing in the workplace, and ensures that they can do so without any fear of retribution or penalisation.

Protected Disclosures

The Bank has in place procedures to deal with any protected disclosures that may arise, including associated investigation practices. Where potential incidents arise in the investigation process, requirements are outlined within the Speak Freely Procedure and managed independently and objectively by Bank's People Experience Team.

Our People Experience team and Speak Freely Champions are available internally to guide our colleagues through this process. We also have an external Whistleblowing Hotline for any external stakeholders wishing to raise a concern. The details of which can be found below.

Email: speakfreely@protecteddisclosure.ie

Website: www.protecteddisclosure.ie

Phone: 01 296 4146

Post: Speak Freely, Melco House, Goatstown Cross, Goatstown, Dublin 14

Grievance Procedure

If a colleague feels they have been personally mistreated or have been subject to behaviours which are contrary to the expected standards and behaviours, concerns can be raised either informally with their People Leader or more formally through the PTSB Grievance Procedure.

Customer Complaints

The Bank has in place a comprehensive Customer Complaints process aligned with our responsibilities under the Consumer Protection Code. Any customer complaints can be dealt with in branch, over the phone or online via customerresolutioncentre@ptsb.ie and will be handled in line with the Bank's policy and procedures.

Data Subject Rights and Transparency

The organisation upholds data subjects' rights under the General Data Protection Regulation (GDPR) which is supported by transparency outlined in the Data Protection Notice. Individuals may contact the Data Protection Officer to exercise their rights or raise concerns regarding personal data processing.

5. Governance and Monitoring

It is our collective responsibility to raise concerns or issues that we identify as having a negative impact on our colleagues, customers, suppliers and communities, and that do not align to PTSB's ambition 'To be Ireland's best personal and business Bank through exceptional customer experiences.'

Charter Sponsor

The Charter Sponsor is responsible for the implementation of the Charter, to include ensuring that it is up to date, communicated to all and added to training schedules for both new and existing colleagues.

Charter Owner

The Charter Owner is responsible for supporting the Sponsor in the implementation of the Charter and associated procedures and the maintaining a central record of details of investigations and disclosures made. The Charter Owner is the central point of contact for queries on the Charter. The Charter Owner will provide the Sustainability Committee and Executive Committee with an annual report on the review and implementation of the Charter.

Implementation Date	February 2026
Review Frequency	Annual
Charter Owner	Head of Sustainability
Charter Sponsor	Chief Sustainability and Corporate Affairs Officer
Approval Forum	Sustainability Committee

Appendices

Appendix 1: List of Supporting Policies that Align with this Charter

Stakeholder	Policy/Charter
All	Anti-Bribery & Corruption Policy
All	Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) Policy
All	Code of Ethics
All	Conduct Management Framework
All	Conflict of Interest
All	Data Protection Policy
All	Dignity and Respect Code
All	Equality through Diversity and Inclusion Charter
All	Group Safety Statement
All	Individual Accountability Framework (IAF) Conduct Standards Policy
All	Sanctions Policy
All	Speak Freely Procedures
Employees	Colleague Conduct Policy
Employees	Grievance Procedures
Employees	Our Culture Charter
Employees	Remuneration Policy
Customers	Enhanced Customer Support Policy
Customers	Business Lending Credit Policy
Customers	Complaints Charter
Customers	Complaints Management Policy
Suppliers	Third Party Management Framework
Suppliers	Sustainable Supplier Charter
Suppliers	Sourcing and Procurement Policy
Communities	Community Policy
Communities	Community Fund Constitution
Communities	Employee Volunteering Policy