



LION FINANCE  
GROUP

# Human Rights Policy

# HUMAN RIGHTS POLICY

**ADOPTED BY**

The Board of Directors of Lion Finance Group PLC

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December 16th, 2022

**APPLIES TO**

Lion Finance Group PLC and its Group Companies

**GROUP POLICY OWNER**

ESG and Sustainability Direction, Legal Department

**REVIEWED BY**

HR Department;  
Investor Relations Department;  
Marketing Department;  
Environment and Climate Risk Department.

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# DEFINITIONS

The below definitions apply to the terms used throughout the Policy.

## Basic Principles

### Discrimination

The intended or accomplished distinction, exclusion or restriction of certain individuals based on gender identity, gender expression, race, skin colour, lineage, national or ethnic origin, sexual orientation, social status, religion, age, disability or any other individual trait, with the purpose or effect of preventing or hindering the recognition and/or exercise, on an equal basis, of nullifying or impairing the recognition of human rights and fundamental freedom in all spheres, including public, private, political, economic, cultural or civil.<sup>1</sup>

### Diversity

This refers to a wide range of identities. Diversity broadly includes race, ethnicity, gender, age, national origin, religion, disability, sexual orientation, socioeconomic status, education, marital status, language, veteran status, physical appearance, etc. It also involves different ideas, perspectives and values.<sup>2</sup>

### Equality

The right of diverse groups of people to have a similar social position and receive the same treatment,<sup>4</sup> ensuring that every individual has an equal opportunity to make the most of their lives and talents.

<sup>1</sup>WEPs, "Understanding Intersectionality: Targeting All Forms of Discrimination in the World of Work"

<sup>2</sup>University of Washington, "Diversity, Equity and Inclusion Glossary"

<sup>3</sup>WEPs, "Understanding Intersectionality: Targeting All Forms of Discrimination in the World of Work"

<sup>4</sup>ibid

### Equity

While equality focuses on providing all individuals and groups with the same starting point and treating all people the same, equity takes peoples' differing experiences, needs and abilities into account and works to ensure all individuals and groups of people are afforded the same finish line.<sup>5</sup>

### Harassment

The use of comments or actions that can be perceived as offensive, embarrassing, humiliating, demeaning and unwelcome.<sup>6</sup>

### Inclusion

An organisational effort in which diverse groups or individuals having diverse backgrounds are culturally and socially accepted, welcomed, and equally treated.<sup>7</sup>

### Work environment

Anywhere employees of the Group are conducting business on behalf of the Group, including, but not limited to, in person, on the phone, virtually, or through email or other internet communications channels, as well as on premises of the Group and at company-sponsored/organised events.

<sup>5</sup>ibid

<sup>6</sup>University of Washington, "Diversity, Equity and Inclusion Glossary"

<sup>7</sup>WEPs, "Understanding Intersectionality: Targeting All Forms of Discrimination in the World of Work"

# DEFINITIONS

## Group Entities

### Ameriabank

Ameriabank CJSC

### Bank of Georgia

JSC Bank of Georgia

### Board

The Board of Directors of Lion Finance Group PLC.

### Employees

Applies to the personnel of the Group companies hired under employment contracts and executive service agreements.

### ESI Committee

Respective Committee established and governing environmental and social matters within the relevant Group Companies. These responsibilities may be overseen by a dedicated ESI Committee or integrated into the mandate of an existing management committee assigned with ESI-related functions.

### The Group

Lion Finance Group PLC and its Group Companies.

### Group Companies

Means companies (a) whose affairs and policies Lion Finance Group PLC directly or indirectly controls or (b) as companies of which Lion Finance Group PLC owns directly or indirectly more than 50% of their capital, voting stock or other right of ownership. "Control", as used in this definition, means the power to direct the management and the policies of that company, whether through the ownership of share capital, by contract or otherwise.

### Human Rights and Ethics Committee

Respective Committee established and governing human rights and ethics related matters within the relevant Group Companies. These responsibilities may be overseen by a dedicated Human Rights and Ethics

Committee or integrated into the mandate of an existing management committee assigned with human rights and ethics-related functions.

## Legal Requirements and International Standards

- The Group's commitment to respecting and promoting human rights—including the prevention of discrimination and harassment—is guided by, but not limited to, the following relevant local legal requirements and internationally recognised standards: The UN's Universal Declaration of Human Rights
- The Charter of Fundamental Rights of the European Union
- ILO Fundamental Conventions as incorporated into the applicable national legislation of each Group Company Convention on the Elimination of all forms of Discrimination against Women
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- UN Global Compact
- IFC Performance Standards

## Other Jurisdictions

This policy covers the Group under the obligations listed under Legal Requirements and International Standards. Further obligations that stem from Georgian and Armenian legislation are overseen by, and carried out in consultation with, respectively, the Chief Legal Officer of JSC Bank of Georgia, and the Legal Director of Ameriabank.

## ESG GOVERNANCE

Oversight of the majority of material ESG topics and related impacts on the economy, people, and the environment is allocated to specific Board Committees: the Risk, Audit, Nomination, and Remuneration Committees. While the Committees retain continued responsibility for discrete ESG-related matters, the full Board retains primary responsibility for the Group's overarching ESG strategy, which has been framed around material ESG topics.

The Board ensures the alignment of ESG strategy with the business strategy, receives updates on progress of the key pillars of the ESG strategy, and oversees the Group's overall communications strategy around ESG topics and impacts. The Full Board also retains primary responsibility for overseeing the management of climate risks and opportunities, and it oversees the management of other Environmental and Social risks and opportunities that may arise in the Group Companies' loan portfolio. Updates on material ESG topics are regularly reported to the full Board or respective Committees.

Management of ESG topics and implementation of ESG strategy are delegated to respective Group companies' Executive Management team. Discrete ESG matters are managed by individual members of Executive Management. A Management-level Environmental and Social Impact Committee (ESI Committee) has been established, comprising the Management Team and senior managers.

The Committee is responsible for managing the Group Company's climate, environmental and social impacts, focusing on those arising from its lending activities. It holds overall responsibility for designing, implementing, and enhancing environmental, social and climate strategies and policies, and for setting and monitoring targets. The Committee intends to further embed Environmental and Social risk management in the Group Company's daily operations.

## SCOPE & OBJECTIVES

Lion Finance Group PLC and its Group Companies (the "Group") are committed to conducting business responsibly and to integrating environmental, social and governance (ESG) criteria into its decision-making processes.

Our Human Rights Policy (the "Policy") describes the basis of our commitment to respect human rights and the approaches, processes and tools we apply to implement it in our relationships with our employees and when providing financial products and services for our broad range of clients. It is an intrinsic part of the Group's commitment to doing business justly.

The Group recognises that human rights concerns can arise not only in its own operations, but also via interactions with external parties. This is why we expect our business partners to recognise and uphold human rights.

We constantly pay attention to how our business activities may affect human rights and never engage in any activities or relationships when there is clear evidence of human rights violations.

Our ongoing aim is to be a bank that strives to develop and maintain diversity and inclusivity – for our employees, our customers, all of our stakeholders and society at large.

The Group respects internationally recognised human rights, does not condone any kind of bullying, harassment and discrimination, and is committed to developing an inclusive culture free from these behaviours. It is expected that both managers and employees will demonstrate an inclusive attitude and behave in such a way that builds and fosters an inclusive culture in the daily course of business.

This Policy sets the principles and guidelines for how the Group enhances human rights through-out the organisation and sup- ports the Group in its efforts to become a better institution for our employees, customers and all other stakeholders.

The Policy applies to all employees of the Group, all functions, all units in the Group, and all subsidiaries once adopted by the management body and the board.

## INTRODUCTION

Human rights are universal. Every person around the world deserves to be treated with dignity and have their interests considered equally. It is an integral part of our values and beliefs that is at the core of all we aspire to do and is designed to ensure we conduct ourselves in a manner that is consistent with the highest ethical standards.

While governments have the primary responsibility of protecting individuals against human rights abuses, business entities have a responsibility to respect human rights, and can play a positive role in the communities where they operate. "As banks with an established presence in both Armenia and Georgia, we are well-positioned to contribute to building societies, where human rights are valued and respected.

As a financial institution, the Group – through the financial products and services it provides and salaries and taxes that it pays – contributes to the economic and social development that is important to supporting the protection of human rights.

We have worked hard to embed

a respect for human rights across the Group – through the products we offer, in the way we make them, and in how we treat people. We plan to continue this journey.

We have a responsibility that goes beyond purely complying with the local laws. We believe businesses can help advance human rights by offering access to decent work, creating higher living standards, protecting people's rights and acting in a responsible manner.

We aim to continually improve our approach on human rights issues. A number of our core internal documents including the Code of Conduct and Ethics as well as our policies reflect our commitment to respect human rights.

In addition, we are guided by a wide range of international external standards and principles, including but not limited to the Universal Declaration of Human Rights, the ILO Fundamental Conventions, as implemented into legislation applicable to each Group Company individually, the UN Guiding Principles on Business and Human Rights, OECD guidelines for Multinational Enterprises and

IFC Performance Standards.

## HUMAN RIGHTS, ENVIRONMENT AND DOING BUSINESS

Financial institutions play an important role in the society by managing financial assets, providing credit and other financial services in ways that promote sustainable economic growth and prosperity.

We believe a healthy environment is integral to fully enjoying a wide range of human rights. A safe, clean, healthy and sustainable environment is essential to the full enjoyment of a wide range of human rights, including rights to life, health, food, water and sanitation. Without a healthy environment, we may not have access to even the minimum standards of human dignity.

Environmental and social risks are important aspects when deciding whether to engage with clients or potential clients, as well as deciding what to finance. As a financial institution, we believe our financing choices can help society transition to becoming more sustainable.

We want to ensure that our actions are compliant with regulations and limit any

negative impact our business may have on the environment and society.

Each relevant Group Company ensures that transactions are reviewed and evaluated against the following applicable environmental and social requirements:

- The respective Group Company's Environmental and Social Risk Management System (ESMS);
- The respective Group Company's E&S Exclusion List;
- Applicable environmental, social, health and safety and labour laws and regulations;
- ILO Fundamental Conventions;
- Applicable international environmental, social and health and safety conventions to which the relevant country is a signatory;
- IFC Performance Standards (PSs) and EBRD Performance Requirements (PRs);

# PRINCIPLES

## 1 Prohibition of Discrimination and Harassment

The Group is dedicated to upholding a safe, diverse, inclusive, productive, professional, collegial, secure and trustful work environment, free from any kind of discrimination, harassment abuse, or similar violations, in which all individuals are treated with respect and dignity.

Discrimination, harassment and abuse are not accepted by or towards employees, customers, vendors, contractors, or any other individuals who conduct business with the Group. We are committed to preventing such behaviour by fostering awareness, encouraging raising concerns, and taking prompt and appropriate action in response to any incidents.

We want to ensure a safe and inclusive environment, regardless of the ethnic heritage, colour, national origin/ancestry, citizenship status, age, race, physical or mental abilities, gender identity or expression, sexual orientation, values, religion/spiritual practice, political and/or other views, military/veteran status, income, family status, pregnancy, maternity, paternity or caring responsibilities, education, geographic location or on any other grounds which intends to achieve or results in denial of or interference with equal opportunity or treatment in employment process and professional work environments.

Please also see our [Anti-Discrimination and Anti-Harassment Policy](#)

## 2 Diversity and Inclusion

The Group is committed to treating everyone with dignity and respect regardless of position or circumstance. We value the benefits of a diverse workforce and believe that a wide range of experiences, perspectives and cultural understandings within the organisation not only benefit us as a workforce, but also increase our market standing

with potential and existing customers.

Please also see our [Diversity and Inclusion Policy](#)

## 3 Human Rights and Our Employees

We are focused on ensuring that our employees feel that employment, assignment, compensation, transfer, promotion, working conditions, terms of employment, termination of employment or retirement and training processes are fair, transparent and inclusive for all. We value and respect everyone's personal space and necessities at the workplace and do not condone any form of discrimination, harassment or inappropriate conduct.

Our approach in general is based on the ILO Fundamental Conventions as well as applicable domestic labour laws.

## 4 Freedom of Association and Collective Bargaining

The Group promotes freedom of association, the right to collective bargaining and the elimination of all forms of forced or compulsory labour.

The Group complies with all applicable laws, rules and regulations. Together with our employee representatives, the Group is willing to seek solutions that best align with the interests of employees. This includes adhering to all local statutory and regulatory requirements. We are open to maintaining a constructive dialogue with all our employee representatives and interacting in partnership and in a spirit of trust.

## PRINCIPLES

### 5 Employee Health, Well-Being and Safety

The well-being of our employees is an integral part of our culture. The Group prioritizes employee health, well-being and safety at the highest level. We provide equal access to health insurance and aim to help everyone in need of special care. We also have financial aid for newly married couples, as well as new parents.

We outline the importance of work/life balance throughout the organization and strive to identify and assess the working conditions of our employees.

We have developed confidential and clear mechanisms to identify, examine and resolve workplace conflicts. We believe that emotionally and psychologically safe conditions ensure employees feel able to express their feelings, speak up and communicate openly.

In order to constantly ensure health and safety at work the Group has a modern prevention-oriented workplace protection system in place.

We are committed to being compliant with relevant health and safety legislations and requirements, providing a healthy and safe work environment, a positive health and safety culture and to effectively assess, manage and control the associated risks.

By strengthening the health and safety awareness and by providing direct and indirect access to medical care for our employees, the Group helps to reduce workplace accidents and job-related illnesses.

### 6 Forced Labour and Child Labour

The Group does not use child labour in its own business operations and has zero tolerance against forced or child labour in any aspect.

### 7 Modern Slavery and Human Trafficking

The Group has zero tolerance for modern slavery and human trafficking. We believe in doing business ethically, transparently and in full compliance with all applicable laws and regulations.

Even though we are a financial service provider and the risk of modern slavery and human trafficking at our own business operations is low, we recognise that our supply chain could potentially pose such risks.

We have processes in place in order to identify the parties in our supply chain that may pose a risk of modern slavery and human trafficking. The Group recognises that it needs to have appropriate processes in place to minimise the risk that our operations could be used in this manner. We have structured our contracts with suppliers accordingly, and aim to minimise the risks of such abuses.

### 8 Human Rights and Our Customers

We put our customers' best interests and needs in the centre of everything we do. We proactively check and make sure that full equity is always ensured when offering products.

Financial health and inclusion are important for the Group. We aim to protect our customers from human rights risks such as discrimination, financial distress, the misuse of their data and other internationally recognised human rights breaches.

## PRINCIPLES

### 9 Human Rights in Our Supply Chain

Human rights are vital to us and we expect the same from our suppliers and third parties. In the Group, human rights are taken into account in procurement decisions along with commercial aspects. We are always determined to assess the level of social and environmental risks associated with a supplier prior to our relationship.

Our vendors are expected to respect their employees' human rights, offer equal employment opportunities to all and to not tolerate discrimination or harassment. We expect that our vendor partners and their supply chains abide by all applicable local laws and regulations in the jurisdictions.

Please also see our [Supplier Code of Conduct](#)

### 10 Personal Data Protection

Individual employee data, as well as client data is regarded as highly sensitive data and therefore special care and security precautions are required when handling, processing, transferring, disclosing and/or sharing such data. Handling of such data is strictly in line with respective laws and national data protection provisions. Our designated data protection officer and/or function and our data protection procedures ensure that everyone working with data complies with internal and external data protection regulations

### 11 Human Rights Process

The Group seeks to prevent, mitigate or remediate adverse human rights impacts that are linked to our operations, activities and business relationships. Due diligence is carried out in order to help identify, assess, prevent and mitigate actual or potential adverse human rights risks and impacts.

### 12 Grievance Mechanisms and Reporting

The Group encourages all its stakeholders to contact the Group in case they have clear evidence of human rights abuses. Clients, employees and all other stakeholders can contact us or make complaints through several channels, including in branches, by phone, website and by post.

The Group has a governance process – the Human Rights and Ethics Committee, as well as whistleblowing and grievance mechanisms in place to ensure that any violation of the Policy principles will be managed appropriately.

## INTERNAL RULES

To ensure that the managers and employees of the Group fully understand the scope and responsibilities regarding human rights, we have internal rules in the workplace. These rules ensure compliance with human rights, anti-discrimination legislation, and encourage and support a culture of equal opportunities, equal rights and fair treatment within the Group.

## RESPONSIBILITIES

It is everybody's responsibility to contribute to creating a culture where human rights are central. It is expected that all employees will behave in a way that is respectful of other colleagues.

It is expected that all managers and employees proactively counteract and stop any direct or indirect bullying, harassment or discrimination. According to the Group's internal regulations, breaches of this Policy may result in disciplinary action.. Where legally permitted, this may include termination of employment, applied strictly in accordance with the relevant Group Company's internal procedures and local labour legislation. Personnel who fail to comply with this Policy may have their contract terminated or suspended, or be subject to other appropriate action.

Our Human Rights and Ethics Committee supervises and monitors the implementation process and compliance with the relevant human rights laws and regulations and ensures the Group companies consistency with the relevant internationally recognised human rights and anti-discriminatory practices. It also regularly assesses the salient human rights risks, associated with the Bank's activities and verifies that these risks are properly identified, assessed, monitored and mitigated. The Committee takes all necessary steps to resolve the employee and customer complaints and grievances related to human rights violations.

## GOVERNANCE AND COMPLAINT MECHANISM

The Group maintains governance processes, including the Human Rights and Ethics Committee, as well as whistleblowing and grievance mechanisms, to ensure that any alleged or confirmed violation of this Policy is addressed in a timely, fair and effective manner. The whistleblowing mechanism is accessible to all stakeholders, including employees, customers, suppliers and other third parties, and is designed to facilitate the confidential and anonymous reporting of concerns.

The Group strictly prohibits any form of retaliation against complainants or witnesses who, in good faith, report concerns or participate in investigations. All reports will be handled with the utmost confidentiality, and appropriate measures will be taken to protect the rights and well-being of those involved.

## RELATED POLICIES

[Anti-Bribery and Anti-Corruption Policy](#)

[Code of Conduct and Ethics](#)

[Environmental Policy](#)

[Anti-Discrimination and Anti-Harassment Policy](#)

[Diversity and Inclusion Policy](#)

[Whistleblowing Policy](#)

[Supplier Code of Conduct](#)

## CONTACT INFORMATION

<b>LION FINANCE GROUP PLC:</b>	
<b>ADDRESS:</b>	29 Farm Street, London, W1J 5RL
<b>TEL:</b>	+44 (0) 203 178 4052
<b>JSC BANK OF GEORGIA:</b>	
<b>ADDRESS:</b>	29a Iuri Gagarini Street Tbilisi, Georgia
<b>TEL:</b>	(+995 32) 2 444 444
<b>CUSTOMER CARE:</b>	<a href="mailto:customerservice@bog.ge">customerservice@bog.ge</a>
<b>WHISTLEBLOWING:</b>	<a href="https://bankofgeorgia.ge/en/anonymous-contact">https://bankofgeorgia.ge/en/anonymous-contact</a>
<b>CJSC AMERIABANK:</b>	
<b>ADDRESS:</b>	Vazgen Sargsyan 2, Yerevan 0010, RA
<b>TEL:</b>	(+37410) 56 11 11
<b>CUSTOMER CARE:</b>	<a href="mailto:info@ameriabank.am">info@ameriabank.am</a>
<b>WHISTLEBLOWING:</b>	<a href="https://ameriabank.fra1.qualtrics.com/jfe/form/SV_817LW83xPbukroG">https://ameriabank.fra1.qualtrics.com/jfe/form/SV_817LW83xPbukroG</a>

## CHANGES TO THIS POLICY

We keep this Policy under regular review. Original/previous versions (if any) can be obtained by contacting ESG and Sustainability Direction (where necessary).

