



OP Pohjola's Human Rights Policy



We, at OP Pohjola, aim to be responsible in everything we do. Our core values – people first, responsibility and succeeding together – give meaning to our work and our choices, and guide our daily work.

We are building a sustainable tomorrow alongside our customers and want to have positive impacts on the society around us. Responsible business is one of our strategic priorities. Our sustainability programme and its policy priorities implement OP Pohjola's strategy, guiding sustainability and corporate responsibility actions across the OP Pohjola.



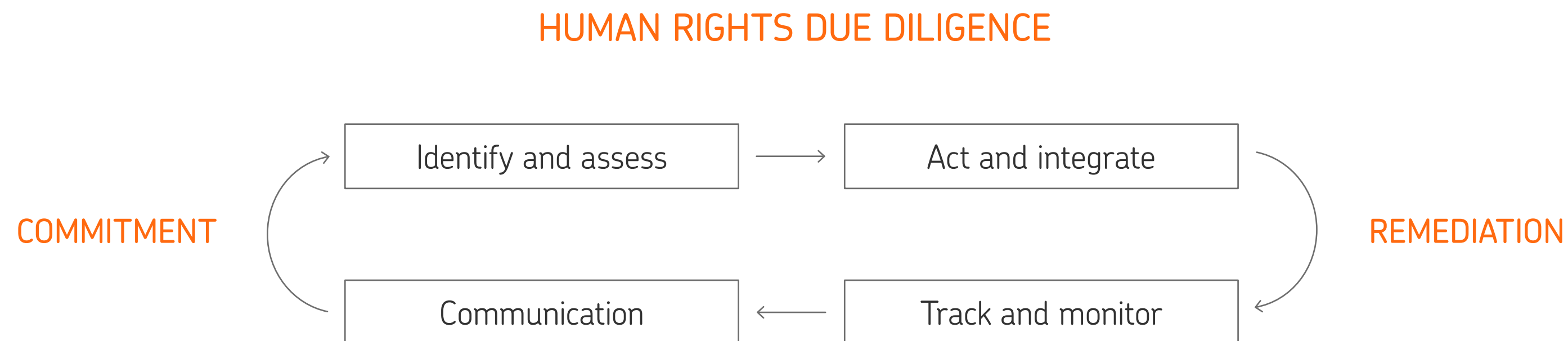
Human rights due diligence

The UN's Universal Declaration of Human Rights states that all people are born free and equal in dignity and rights. It proclaims that everyone is entitled to all rights and freedoms presented in the Declaration without distinction of any kind such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other any other factors.

We recognise that, through our operations, we have a major impact on various sectors of society. Accordingly, we aim to create and promote positive impacts on people. Our various means of promoting the wellbeing of our staff and local communities lie at the heart of our sustainability programme and our activities as a cooperative. However, we recognise that our activities could have connections with various situations in which human rights are not always realised as they ideally should be. In this

Human Rights Policy, we describe our approach to respecting human rights and preventing, mitigating and remedying any salient, adverse human rights impacts that we identify.

Reviews of our Human Rights Policy and human rights impacts cover all of OP Pohjola's operations, including customers, sectors, supply chains and suppliers operating in the value chain.



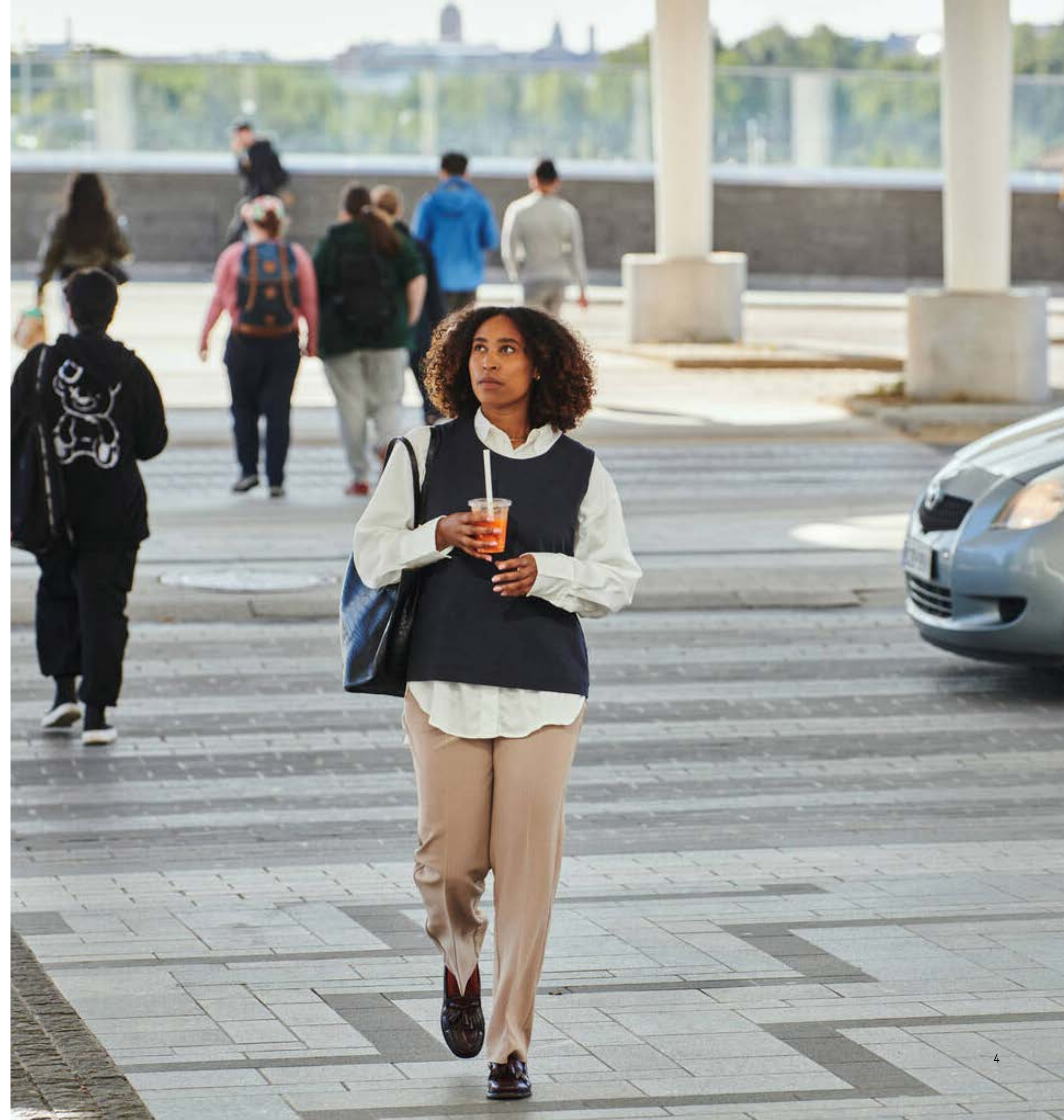


Our Human Rights Statement

We are committed to respecting all recognised human rights. OP Pohjola's Human Rights Statement includes all requirements and expectations we have set for ourselves, and for other actors as part of our value chain.

Our Human Rights Statement applies to the whole of OP Pohjola. Our commitment to respect human rights extends beyond our employees and suppliers to our customer businesses.

OP Pohjola published its Human Rights Statement in 2023.





Salient human rights impacts within OP Pohjola

We have recognised that, as a service provider in the financial sector, through our value chains we have potential and actual direct and indirect impacts on human rights and their realisation. We have direct impacts in relation to the services that we provide for our employees and customers, in particular. Indirect impacts affect the customer business's value chains, supply chains and local communities.

Key definitions

Adverse impacts are those which deprive an individual of the possibility to exercise their human rights, or which weaken the realisation of human rights. A potential human rights impact is one which could occur but has yet to transpire. An actual impact, on the other hand, is an adverse impact which has occurred.

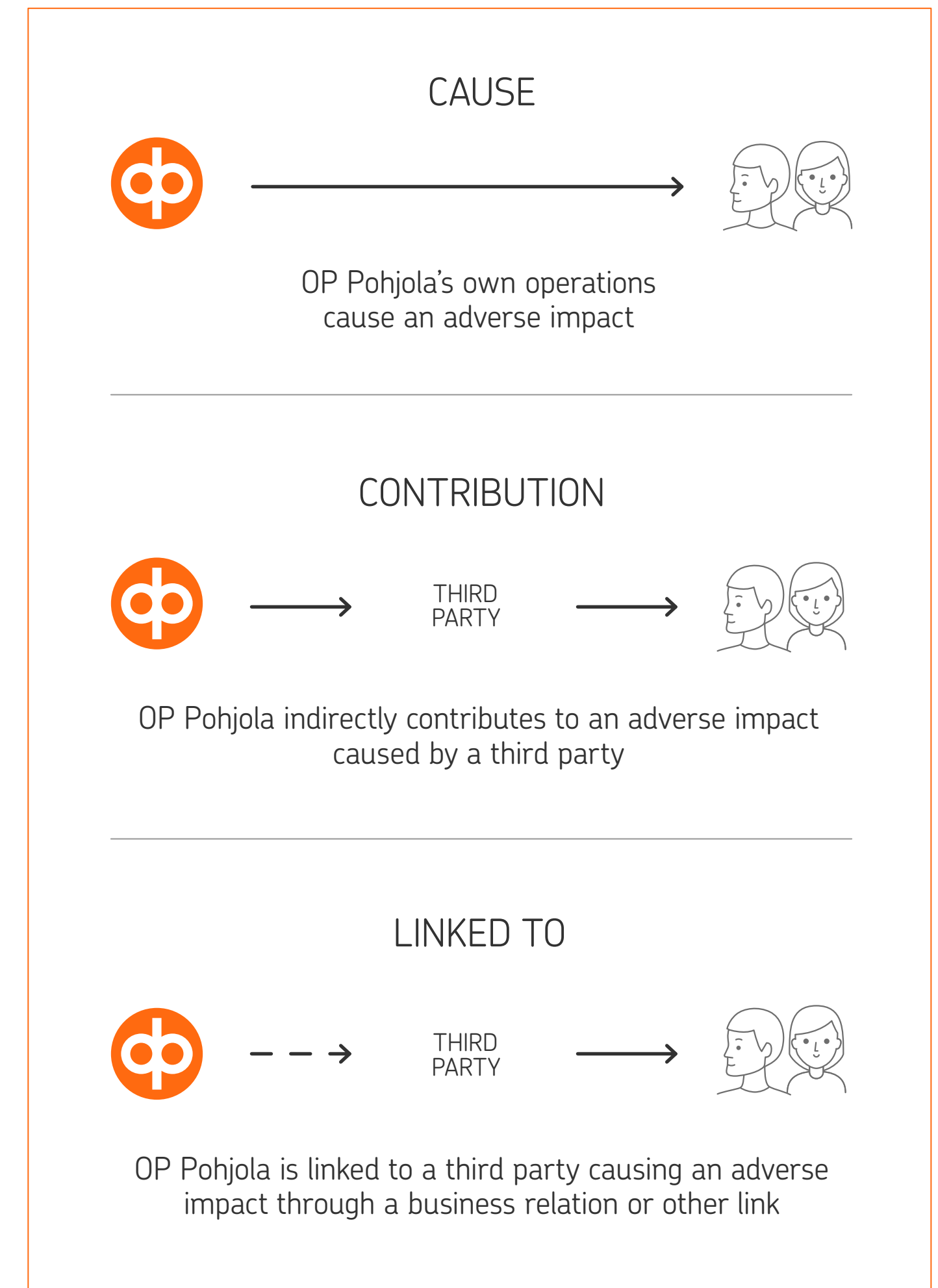
OP Pohjola's potential adverse human rights impacts can be divided into three groups:

- impacts which OP Pohjola can cause through its own operations
- impacts to which OP Pohjola can contribute directly or through a third party
- impacts which OP Pohjola has not caused or contributed to, but which may be linked to OP Pohjola's operations through business relationships

Corrective measures and remediation refer to:

- processes for correcting adverse human rights impacts
- solutions for correcting an actual adverse impact.

Solutions can take different forms – the need for remedies and solutions is always defined on a case-by-case basis.





Identification and assessment

In 2023, we performed a human rights assessment of OP Pohjola's operations. Our assessment identified salient and key human rights themes related to OP Pohjola's business, personnel and supply chains. OP's assessment of salient human rights impacts was based on the impact assessment method (taking account of the scale, scope, irremediability and likelihood of human rights-related risks) presented in the UN Guiding Principles on Business and Human Rights (UNGPR).

We engaged our internal stakeholders and external experts in the recognition and assessment of human rights-related risks. Recognition and assessment of salient human rights impacts are based on the severity of risks and evaluation of their probability. In our assessments, we used a range of internal and external analyses, and information from openly published reports on sectors and countries that are significant to our business. We also used personnel surveys and analyses which we had commissioned, customer feedback we had received, actual or potential cases of which we had become aware, and

observations based on our activities. In addition, we have evaluated our human rights assessments (including current status and further work) with the help of external experts.

We regularly review and report on our human rights impacts as part of our sustainability reporting. Moreover, we develop and update our human rights risk assessment work and the related action plans as part of other business-related decision-making. Our continuous monitoring includes the further development of consultation with stakeholders, particularly those subject to potential adverse impacts.

Impacts and responsibilities

We at OP Pohjola have a range of human rights impacts and responsibilities, depending on the role in which we are acting.

As an employer, we have a responsibility to treat all employees and potential employees and applicants fairly, equally and impartially, while respecting their human rights.

We use our influence to promote the realisation of human rights and prevent adverse human rights impacts in our customers' business activities, and in operations in which we invest. We treat our customers equally and with respect when doing business with them.

We need a variety of products and services – including those sourced from a wide range of other suppliers and partners – for the OP Pohjola and its businesses. As a large purchaser, we are responsible for ensuring that our supply chain partners respect human rights in their production of products and services.

As a member of local communities, we want to have positive impacts on our environment and thereby promote the wellbeing of people and the business environment.



Our human rights impacts

	As an employer	As a purchaser	Customer business	As a service provider	As a member of the local community
Who would be affected	Employees of OP Pohjola	Employees and extended workforce in our supply chain	Employees, consumers and institutions on which our customer companies or investments can impact	Our customers	Members of our local communities
By whose actions	OP Pohjola	Suppliers in our supply chain, and their subcontractors	Our corporate customers, the companies we invest in and their value chains	OP Pohjola and our partners	OP Pohjola and our partners
	In most cases, OP Pohjola could cause impacts	In most cases, OP Pohjola could contribute to, or have a connection with, the impacts	In most cases, OP Pohjola could have a connection with the impacts	In most cases, OP Pohjola could cause or contribute to the impacts	In most cases, OP Pohjola could contribute to, or have a connection with, the impacts



Due diligence of our salient human rights impacts

OP Pohjola uses a range of means to identify our salient adverse impacts on human rights. We continuously review and monitor our operations to ensure that the measures we take primarily impact where intended.

Through such measures, we prevent and mitigate adverse impacts, and intervene if impacts occur. Our salient human rights impacts and the related measures are described below:

As an employer

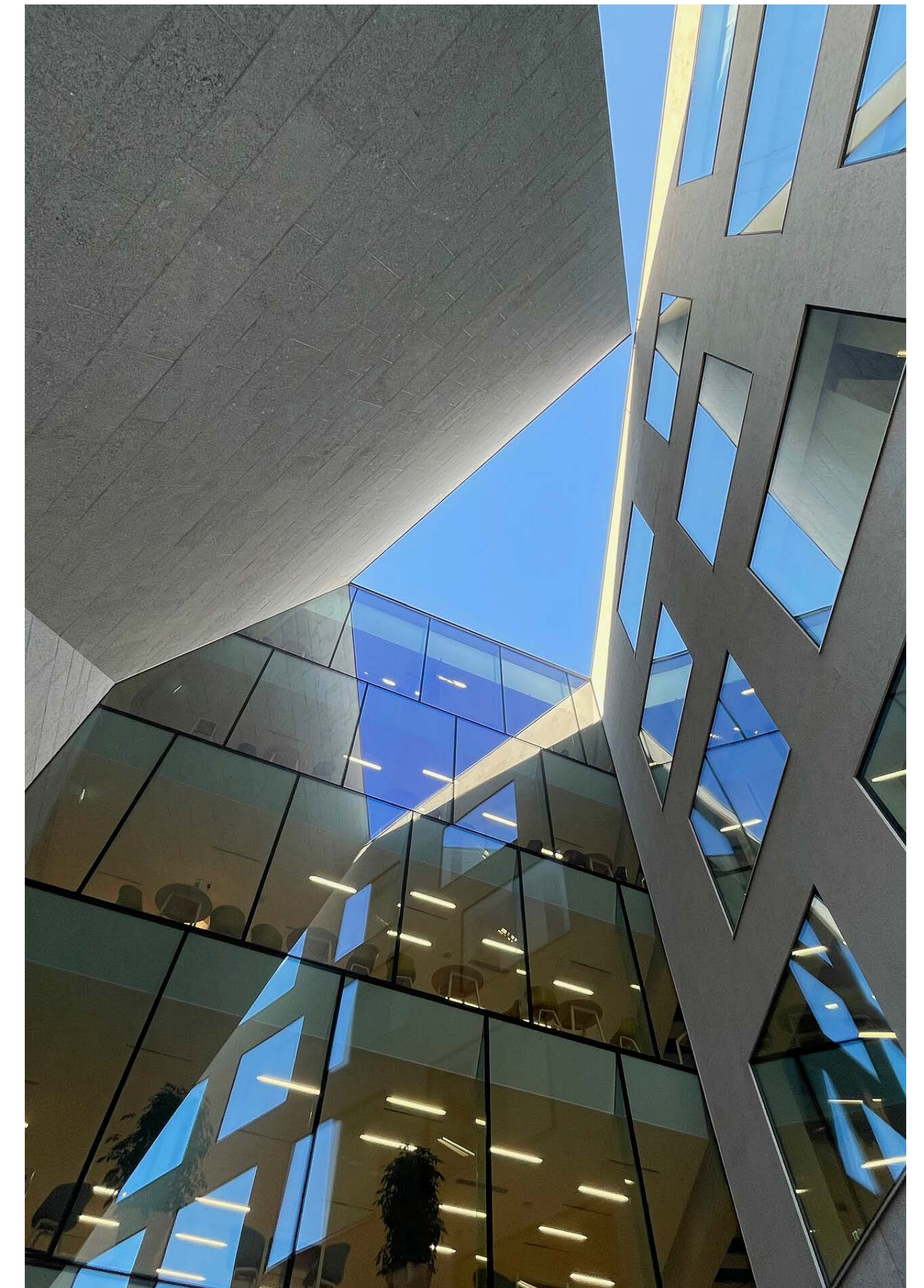
We aim to foster a diverse, inclusive and non-discriminatory culture. Salient human rights impacts identified in OP Pohjola concern the people directly employed by us, or working for subcontractors. Human rights issues include the equal and impartial treatment of employees, for example during recruitment and career transitions.

Bullying, harassment and inappropriate conduct are forbidden in OP Pohjola. We handle all reports of inappropriate conduct in accordance with guidelines.

This involves interviewing the person in question, who has the option of bringing along a support person. Reports made via the whistleblowing channel are processed in accordance with a pre-defined operating model and annually reported to OP Pohjola's management at the level of general observations, without revealing personal details.

Employee selection, remuneration, career development, training and general practices in the workplace must be characterised by equal treatment. We use an equal opportunity survey to monitor the realisation of equal and impartial treatment, on the basis of which we plan further measures and report the results to management and employees.

For persons working in OP Pohjola, we map and monitor our current human rights impacts by actively listening to our employees' experiences. We conduct annual pulse surveys on employee wellbeing and job satisfaction. Every second year, we hold a wider-ranging employee survey on subjects such as equality and equal opportunities. In addition,





we ask every job applicant and exiting employee to fill out a feedback form.

In line with its coaching principles, OP Pohjola encourages regular discussions between employees and their supervisors. Such discussions can be related to themes, goals, competencies, or performance based on the annual cycle. They can also be based on criteria set down in collective agreements, or take the form of interventions and the provision of support if work ability deteriorates.

OP Pohjola has a permanent set of remuneration principles. Account is taken of various remuneration components when realising the principles of OP Pohjola's Equality and Non-discrimination Plan – for example, between age groups and genders. Remuneration is based on the qualification class assigned to the role. This enables equality monitoring and intervention in cases of unjustified pay gaps. The remuneration principles, pay policy and remuneration terms and conditions are clearly documented and communicated to all personnel. Realisation of pay equality is regularly monitored and annually reviewed by the Remuneration

Committee of OP Cooperative's Board of Directors, by OP Cooperative's Board of Directors and by the Supervisory Council's Remuneration Unit.

Customer business

In our customer business, we aim to identify any human rights risks and impacts associated with our customers or investments. In this respect, we have identified salient, potential human rights issues related to matters such as occupational health and safety, and working conditions and sufficient pay. There are also potential risks that concern human trafficking, forced labour or child labour within the long value chains of our customers and investments.

Financing

For financing purposes, our corporate customers are sorted into ESG (Environmental, Social, Governance) categories based on industry exposure to ESG factors. If an ESG category and the total exposures of a group of connected clients are significant, we perform an ESG analysis in support of our decision, which enables us to identify salient human rights

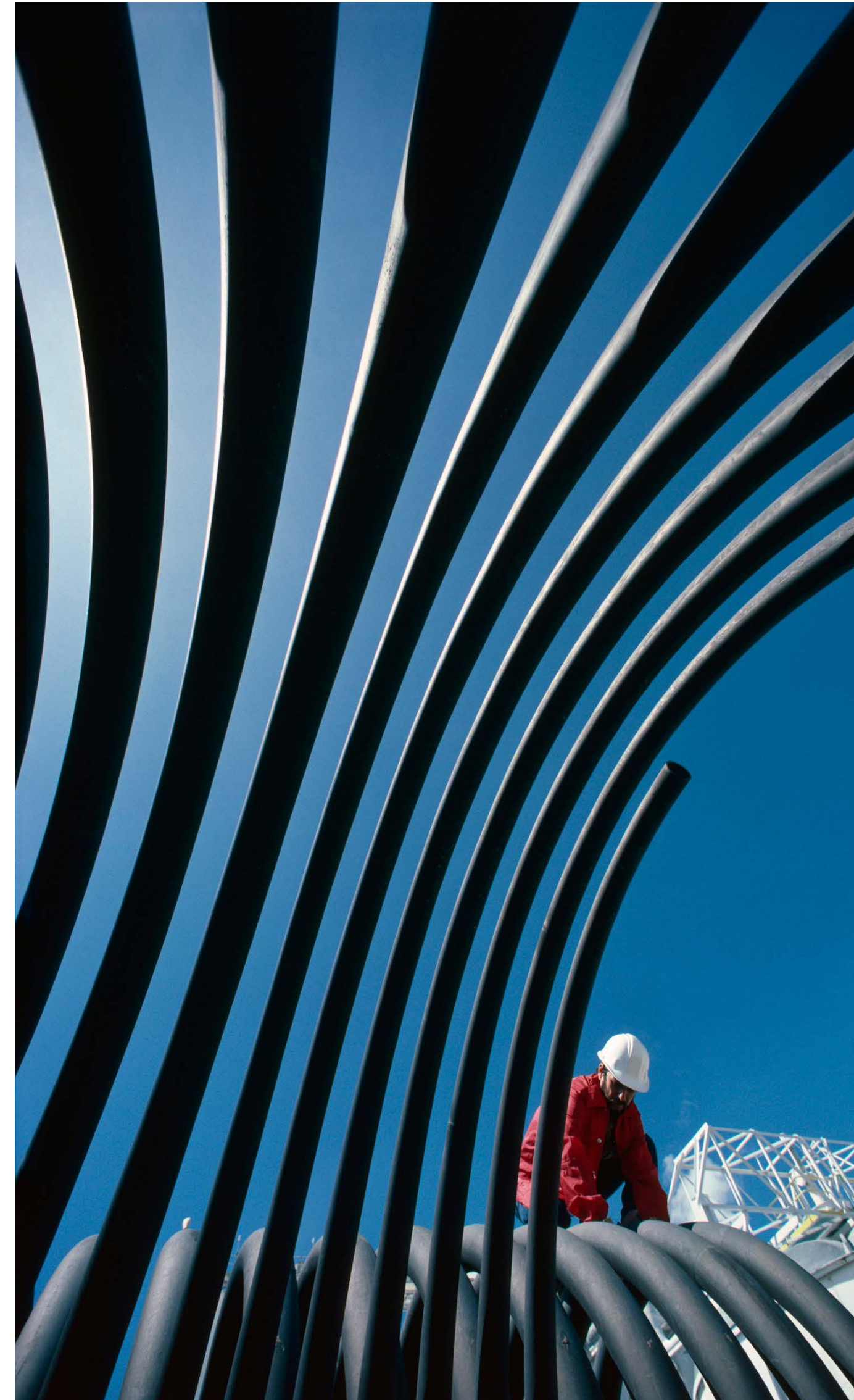
issues related to the customer's business. The need for an ESG analysis is regularly assessed during the customer relationship. We are further developing ESG analysis and its application to take broader account of human rights issues, in order to ensure better assessment of riskier sectors. Regardless of the arrangement of or need for an ESG analysis, we prioritise discussions of ESG themes with our corporate customers.

Regarding credit portfolios, as well as conducting company-specific ESG analyses, we have identified high-risk sectors in our corporate customer businesses. Analysis indicates potential social responsibility impacts related to OP Pohjola's corporate portfolios, such as health and safety risks, impacts on accessibility, or people's right to earn a living freely. The agriculture and forestry sector and mining industry have a particularly high risk of adverse human rights impacts in areas such as working conditions and sufficient pay. Occupational health and safety risks can be found in the energy, transport and manufacturing sectors in particular.



OP mutual funds

The minimum level we apply to responsible investment has long been determined by principles, portfolio screening and monitoring in accordance with international norms, such as the OECD's Guidelines for Multinational Enterprises or the UN's Global Compact. OP Asset Management screens its investments each quarter, using data from two external service providers capable of performing analyses to detect international norm violations, for example. Screening applies to active direct investments made via OP funds. We do not make active direct investments in companies that have violated international norms and where engagement has been unsuccessful. If a company we have invested in seems to have violated international norms or ethical business principles, the first option is shareholder engagement to influence the company. If engagement is unsuccessful, we will switch to the second option of selling the company. Regular monitoring and granular, company-specific analysis by OP Asset Management enables us to e.g. check whether companies in which we invest are involved in the use of child labour, occupational wellbeing-related controversies, or other human rights violations. Since the primary goal is to



resolve observed human rights violations through dialogue and cooperation, our asset management operation utilises active ownership and engagement. Company-specific dialogue arranged by the service provider focuses on companies that have been identified as violating international norms or placed on the service provider's watchlist.

Through engagement, we aim to promote the correction of possible human rights violations. Selling our holding is only a secondary option, which we apply if engagement is ineffective. However, before excluding a company highlighted by the service provider as a norm violator, we also conduct our own analysis to see if the company has made sufficient progress in amending human rights policies or if the actions that led to the violation are considered to have expired. In the case of passive investments (index funds), OP uses benchmark indexes for its own index funds. These indexes exclude companies that violate international norms (UN's Global Compact, OECD's Guidelines for Multinational Enterprises and companies flagged as controversial by the MSCI).

We employ a significant number of people through our real estate investment, including



in the construction and property maintenance sectors. Potential risks in these sectors are related to occupational safety and workers' rights in particular. In our construction contracts, we require supervision and screening of contractors by a third party, providing confirmation that the collective agreement or key employment terms and conditions are applied, documentary evidence that accident insurance has been taken out, and verification that occupational health care has been arranged. All employees must be given site-specific orientation by the construction company and be registered as employees, in addition to which dedicated supervisors must be present on each site commissioned by OP Real Estate Asset Management Ltd. For our property management and rental activities, we use partners subject to the same sustainability and corporate responsibility requirements as our other subcontractors.

Insurance companies

OP Pohjola's insurance companies – OP Life Assurance Company and Pohjola Insurance – take account of human rights impacts in their investment and insurance activities.

In their investment activities, the insurance companies comply with the responsible investment principles accepted by their boards of directors. They take account of key sustainability factors – ESG (environmental, social and governance) factors – to enhance long-term returns, reduce risks and foster the realisation of positive ESG impacts. Our insurance companies' investments comply with the same practices and principles as those presented above, in OP mutual funds. Responsible investment is also the key principle underlying the range of unit-linked investments offered to customers of OP Life Assurance Company.

In line with the UN Principles for Sustainable Insurance, Pohjola Insurance has committed itself to take account of and promote positive impacts on society and people in all its activities and decision-making. For example, Pohjola Insurance provides occupational safety inspections to support corporate customers in this respect. Moreover, Pohjola Insurance processes confidential and sensitive data (such as patient data) when providing personal insurance – OP Pohjola ensures the secure handling and privacy protection of such data as part of its data security and protection activities.





As a service provider

In our services for customers, key human rights issues concern the accessibility of banking and insurance services, and the secure use and management of customer data.

Customers must be treated equally and without discrimination. Discrimination is forbidden, in all cases, on the basis of age, gender, origin, nationality, language, religion, beliefs, opinions, political activity, trade union activity, family relationships, state of health, disability, sexual orientation or other personal characteristics. OP Pohjola is continuously developing its digital services, enhancing the accessibility of its websites and services so that special groups, such as people with disabilities, can use digital services. We recognise that our customers include groups whose only genuine alternative for managing banking and insurance is via a branch or interpreter – we offer services in support of these customer groups. Our Finnish and Baltic operations have procedures to enable customer feedback and complaints processes.

Diligent and careful processing of personal data is a





priority, to ensure that such data cannot be abused with criminal intent or to cause harm to customers. OP Pohjola has common, well-rehearsed procedures for preparation, protection, detection and deviation response in case of cybersecurity and data protection threats. We provide training to ensure that every employee of OP Pohjola is familiar with these procedures.

We process personal data in compliance with data protection legislation and good data governance and processing practices, and ensure that privacy protection is not compromised. In our annually published OP Pohjola Data Balance Sheet, we present a more detailed description of key principles, practices and figures related to personal data processing, data security and information security.

Human trafficking and money laundering can be interrelated. OP Pohjola processes billions of payment transactions a year and uses various systems and experts to monitor them. We continuously invest in financial crime prevention, based on our employees and system development. Employees of OP cooperative banks and OP Pohjola's other companies also play an important role in Know Your Customer (KYC) activities, maintaining customer data, monitoring

customers' account transactions, and identifying suspicious activities. All OP Pohjola employees are regularly trained in matters such as the detection and reporting of unusual transactions. In this way, we ensure that they understand regulations, guidelines and procedures related to anti-money laundering (AML) activities and sanctions.

As a purchaser

We aim to act as a responsible purchaser within our supply chains. OP Pohjola purchases both services and goods. Most of its suppliers are based in Finland and provide services in the domestic market, but also produce some goods and services abroad. In the case of OP, human rights risks are focused and managed differently depending on the purchase category.

OP Pohjola has a high amount of extended workforce in both Finland and abroad, particularly in India. Depending on the work's purposes and goals, extended workforce is based on various types of contracts, e.g. agency workforce or service providers. The same values and basic principles apply to all persons working at OP Pohjola: we do not permit discrimination against any workers and

aim to ensure a good working environment for our extended workforce, whether they are located in Finland or abroad. Potential salient human rights issues related to our purchases in Finland concern sectors with risks in areas such as employee rights, working conditions and sufficient pay. We recognise that some of our service providers' sectors involve special risks to occupational safety and working conditions. Regardless of the type of employment, we provide all our employees with sufficient orientation that covers the job in question, workplace practices and premises, in accordance with the Occupational Safety and Health Act. Alongside our largest providers of extended workforce, we also monitor jointly agreed targets related to e.g. progress in achieving equality.

OP Pohjola needs multiple goods suppliers in addition to providers of extended workforce. Because we have long subcontracting chains, our activities may be subject to indirect risks in terms of working conditions or sufficient pay. Long supply chains can also involve risks concerning the rights of women or members of minorities to work, and child and forced labour.



We require our suppliers of goods and services to comply with OP Pohjola's Supplier Code of Conduct, OP Pohjola's General Procurement Terms and Conditions, and any applicable legislation and international agreements. Our Supplier Code of Conduct is binding on all suppliers and partners of OP Pohjola. By signing up to the Code, our suppliers undertake to monitor their service providers and suppliers, ensuring that they comply with all laws, regulations and OP Pohjola's principles of corporate responsibility. In addition to the minimum requirements in general instructions, we aim to identify the key responsibility themes and criteria of each purchasing category.

The supplier's responsibility is assessed during supplier approval, tendering exercises and then regularly during the actual partnership in line with the agreed procedures. We perform supplier audits on a risk basis. In audits, we analyse our suppliers' commitment to our responsibility requirements and their practices in requiring that their own supply chains comply with similar responsibility principles.

As a member of the local community

OP Pohjola provides extensive support for cultural, sport and other types of associations in Finland. It plays a significant role in promoting wellbeing and equal opportunities at local community level, and in creating positive impacts. In cooperation with our partners, we foster people's financial and digital skills. We also facilitate summer employment for thousands of youngsters each year, by donating young employees' pay to associations that agree to provide summer jobs. However, our sponsorship and donations could also have adverse impacts e.g. on the equal treatment of members of our partner associations.

Responsibility and respect for human rights are part of our sponsorship criteria, based on which we assess all potential sponsorship partners. Most of our sponsorship and donation activities are targeted at children and youngsters – we treat their wellbeing and rights as key priorities when we select partners.

Most OP cooperative banks have their own Representative Assembly, which is the bank's

highest decision-making body. Members of the Representative Assembly are elected: every owner-customer has the right to stand for election and each owner-customer has one vote. This increases the activeness of owner-customers, because the Representative Assembly can propose matters to the OP cooperative bank that have an impact on people in the local community.

Our human rights work is continuous, and we persistently develop our human rights-related risk management and processes. We are also increasing our employee training on this theme. By developing our activities, we aim to prevent any adverse human rights impacts to which we may be contributors.



Examples of potential adverse human rights impacts that have been identified

Our role	Human rights	Example of potential adverse human rights impact	Examples of ways of preventing and mitigating impacts
As an employer	<ul style="list-style-type: none">• Right to non-discrimination• Minority rights	<ul style="list-style-type: none">• People with disabilities and other members of minority groups are not treated equally in recruitment	<ul style="list-style-type: none">• Training of recruitment experts, taking account of accessibility as part of office facility planning in every renovation project
Customer business	<ul style="list-style-type: none">• Right to good working conditions• Right to health• Right to life• Children's rights	<ul style="list-style-type: none">• Forced labour or child labour is used in global subcontracting chains that we finance, insure or invest in• Human trafficking or debt bondage is practiced through companies that we finance or insure• Occupational safety violations occur in companies that we finance, insure or invest in, which lead to an occupational accident	<ul style="list-style-type: none">• ESG analysis as part of investment decisions, screening for norm violations, active ownership via the Sustainalytics corporate engagement service, and exclusions from direct investments where necessary• ESG analysis as part of financing and investment decisions; discussions of ESG themes with customers; and anti-financial crime, anti-money laundering and KYC processes• Occupational health and safety (OHS) inspections of corporate customers' premises to ensure that OHS is taken into account in insurance activities
As a service provider	<ul style="list-style-type: none">• Right to privacy• Right to non-discrimination• Minority rights• Right to health	<ul style="list-style-type: none">• A customer's sensitive information falls into the wrong hands due to a data breach or leak• A customer is unable to use services on an equal basis because of limitations due to age, health issues, or a disability	<ul style="list-style-type: none">• Information security and data protection training for all employees, regular review of cyber risk map, data security audits, cooperation with third parties, and anti-financial crime, anti-money laundering and KYC processes• Accessibility analyses, enhancement of accessibility as part of digital service development
As a purchaser	<ul style="list-style-type: none">• Right to good working conditions• Right to health• Right to life• Children's rights• Minority rights	<ul style="list-style-type: none">• The working conditions and pay of people working in our subcontracting chain are inadequate• Forced labour, human trafficking or child labour occur in our supply chains or suppliers' subcontracting chains• Inadequate occupational safety practices in supply chains lead to an occupational accident involving employees• Supply chain employees work in countries where women's and minority rights are endangered	<ul style="list-style-type: none">• Suppliers' codes of ethics – which extend to the suppliers' subcontracting chains – suppliers' audits, agreement of possible supplier-specific goals
As a member of the local community	<ul style="list-style-type: none">• Children's rights• Minority rights• Right to non-discrimination	<ul style="list-style-type: none">• A case of discrimination arises in the operations of a sponsored partner• An association that has received a donation from us does not give a young employee sufficient orientation in their summer work, due to which an occupational accident occurs	<ul style="list-style-type: none">• Selection of sponsored organisations in line with responsibility criteria, orientation for the employer's association (to which we are donating the youngster's salary) about the employer's obligations



Reporting of adverse human rights impacts

OP Pohjola has channels for anyone who may experience adverse impacts of various kinds. This enables us to intervene at an early stage, prevent future human rights violations, and provide remediation for those who suffer from violations.

OP Pohjola encourages its employees to report their suspicions to their supervisors, local HR Manager, or the Compliance Officer. In addition, there is an external whistleblowing channel for employees and extended workforce of OP Pohjola, through which reports are directed to an independent compliance function for investigation. The whistleblowing channel is designated for the reporting of suspected wrongdoings and violations. Such potential wrongdoings or violations include e.g. fraudulent, suspicious, dishonest, illegal or unethical actions, or conduct by an employee and other actions in breach of rules or regulations.

The whistleblowing channel can be accessed at any time (24/7) via websites external and internal to OP.

The channel is anonymous and uses a secure and encrypted service: no information is saved on the basis of which the whistleblower could be identified. If the whistleblower has given their identity, it may only be disclosed to parties outside the investigation if this is required by law or has the whistleblower's consent. OP Pohjola's whistleblowing principles are public and can be viewed at op.fi.

The whistleblowing channel is not intended for giving customer feedback or filing complaints.

For functions based in Finland, the whistleblowing channel and customer feedback channels are available in Finnish, Swedish and English. Their accessibility has been assessed. Whistleblowing channels are available to employees of functions based in the Baltic countries. In addition, open whistleblowing channels are available via the bank's website in the local languages (Estonian, Latvian and Lithuanian) and in English.

[Reporting suspected misconduct](#) >



Links

[Human Rights Statement](#) >

[Code of Business Ethics](#) >

[Supplier Code of Conduct](#) >

[Shareholder Engagement Principles of
Funds Managed by OP Fund Management
Company Ltd](#) >

[Principles of OP Pohjola's whistleblowing
channel](#) >

[OP Pohjola reports](#) >

