



HUMAN RIGHTS POLICY

GRUPO FEDOLA

GF-JURIDICO

VERSION CONTROL

VERSION	DATE	RESPONSIBLE	COMMENTS
1.0	28/10/2022	Legal Department	Creation
	11/11/2022	Board of Directors	Approval
	19/04/2024	Criminal Compliance	Review
	06/11/2024	Criminal Compliance	Review and adaptation to inclusive language

The following is a translation of this policy provided for informational purposes only. In the event of any discrepancy or inconsistency, the Spanish version shall prevail and be considered the sole legally valid and binding text.

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1. Introduction

The Board of Directors is entrusted with the authority to design, assess, and permanently review the governance and sustainability system and, specifically, to approve and update corporate policies, which contain the guidelines governing the actions of all the companies forming part of **Grupo Fedola** (hereinafter, the **Group**). Accordingly, respect for **Human Rights** is a fundamental part of the Group's sustainability.

The purpose of this policy is to formalise the Group's commitment to the human rights recognised in national and international legislation, as well as to define the principles that the Group shall apply for due diligence in the field of human rights, in accordance with the **Guiding Principles on Business and Human Rights**, the **OECD Guidelines for Multinational Enterprises**, the principles on which the **United Nations Global Compact** is based, the **Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy**, the conventions of the **International Labour Organization (including Convention 169)**, the **Sustainable Development Goals (SDGs)** approved by the **United Nations**, the Group's **Code of Ethics**, as well as the documents and texts that may replace or complement those referred to above.

This policy applies to all the companies forming part of the Group.

2. Basic principles

In line with its sustainability policy, the Group undertakes to respect and promote human rights within its sphere of action, and to prevent, or where appropriate minimise, any violation directly caused by its activity.

In order to achieve the above commitment, the Group adopts and promotes the following **basic principles of action** in each area:

A) In relation to the workforce: employees of the Group have the right to enjoy a **decent working environment**. To this end, a basic principle of action within the Group is to provide **equal opportunities** in access to employment and professional promotion, ensuring at all times the absence of discrimination on grounds of race, sex, age, gender, sexual orientation, ideology, religion, nationality, marital status, or any disability. In the same way, the Group undertakes to maintain a working environment free from harassment, abuse, intimidation, or violence. It also rejects knowingly resorting to any form of forced or compulsory labour.

It recognises the fundamental right of employees to form or join trade unions or representative bodies. It also guarantees respect for freedom of opinion, the exercise

of trade union activity, collective bargaining, and the protection granted to workers' representatives, in accordance with labour legislation.

The Group considers occupational health and safety of employees to be fundamental, with the permanent improvement of working conditions being a priority objective. The Group shall comply with the requirements established in national legislation in this field, adopting the appropriate measures to guarantee safety and health in the workplace.

The Group remunerates employees in a dignified manner, in line with their training, experience, responsibilities, and functions, in accordance with applicable legislation and the socio-economic context. It also guarantees employees' right to rest in accordance with social legislation. The Group safeguards employees' right to the protection of their personal data and their privacy.

B) In relation to clients and suppliers: employees of the Group shall pay special attention to offering clients only those products and/or services that are suited to their circumstances and needs, facilitating the understanding of their terms and conditions, benefits, risks, and costs, and avoiding any unjustified discrimination against the recipients of its offer of products and/or services.

The Group shall promote respect for human rights throughout its supply chain and, in particular, shall urge that the commitments set out in this policy be extended to its suppliers or supplier companies and to their employees, always respecting their managerial autonomy.

C) In relation to society in general: the Group undertakes to support and directly promote human rights in the society in which it is present (**in cooperation with governmental bodies, non-governmental organisations, and other institutions**) and to monitor the impact of its production processes.

The Group recognises society's right to enjoy a **clean and healthy environment** and undertakes to encourage the minimisation of consumption and waste in production processes, as well as to optimise and rationalise the use of energy, in addition to promoting the proper treatment of waste through reuse and/or reduction, in line with the Group's sustainability.

The Group shall ensure that measures relating to physical and information security are developed in such a way that respect for human rights is guaranteed. The professionals performing these functions must prove their suitability for the position and shall receive the appropriate training.

In addition, the Group shall contribute to the eradication of corruption, as established in its **anti-corruption policy**.

3. Implementation, dissemination and control

The Group shall adapt its operational procedures to the basic principles of action set out in this policy and shall, where appropriate, monitor and update its content.

The Group shall give this policy adequate dissemination so that it is known both internally and externally. The organisation has a **whistleblowing channel** to receive reports related to the principles and rules of conduct referred to in this policy.

4. Approval

This policy was approved by the **Board of Directors of Grupo Fedola, S.L.** on **11 November 2022**.