



EZENTIS

HUMAN RIGHTS POLICY

GRUPO EZENTIS S.A.

26 March 2021

[Translation from the original in Spanish. In case of discrepancy, the Spanish version prevails]

1. OBJECT

The purpose of the Human Rights Policy (hereinafter, the "Policy") is intended to lay down the foundations and general principles guaranteeing and strict compliance with and respect for human rights in the performance of Ezentis Group activities, establishing a shared and horizontal reference framework allowing all employees, shareholders, suppliers, contractors and other stakeholders that form part of or interact with Ezentis Group may act and make decisions in accordance with the commitments and principles of action described in section 4.

With this Policy, Ezentis Group aims to ensure that all its activities are carried out in accordance with a strict due diligence model in order to identify, prevent, mitigate, remedy and account for management and performance in human rights matters.

2. SCOPE

This Policy applies at the corporate level and is therefore applicable to all companies comprising Grupo Ezentis, currently made up of the public limited liability company Grupo Ezentis, S.A. and its dependent companies (hereinafter, "Grupo Ezentis").

This Policy applies to all employees and lead them follow principles and guidelines aligned within this Policy and other internal rules, such as the Sustainability Policy and the Code of Ethics and Conduct. This Policy is therefore considered to be a corporate reference document and serves as a guide for all departments of the Group. The appropriate adaptations will be made, where necessary, in order to, among other reasons, comply with national and EU regulations, as well as with the recommendations or requirements formulated by the corresponding bodies.



Ezentis will also disclose this Policy to its customers, suppliers and contractors in order to ensure the integrity and transparency of its relationships with third parties.

Grupo Ezentis, S.A., in its capacity as parent company, is responsible for laying down the foundations, instruments and mechanisms required for appropriate and efficient coordination between the Company and the other members of the Group, so as to ensure compliance with this Human Rights Policy.

3. NORMATIVE REFERENCE FRAMEWORK

The following treaties or regulations in force at national and international level are adopted in this Policy:

1. United Nations International Bill of Human Rights.
2. United Nations Guiding Principles on Business and Human Rights.
3. United Nations Global Compact Principles and the Sustainable Development Goals (2030 Agenda).
4. International Labour Organization (ILO) Core Conventions Nos. 29, 87, 98, 100, 105, 111, 138 and 182, as well as the ILO Declaration on Fundamental Principles and Rights at Work.
5. Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.
6. Directive 2014/95 on non-financial information and diversity and its transposition into Spanish law through Law 11/2018 of 28 December.

Likewise, the Human Rights Policy will be complementary to the other internal regulations of Grupo Ezentis, such as, for example:

- Code of Ethics and Conduct
- Crime Prevention Protocol
- Sustainability Policy

4. COMMITMENTS AND MANAGEMENT MODEL

Pursuant to section 6 "Standards of Conduct" of Grupo Ezentis Code of Ethics and Conduct, the company explicitly assumes the commitment to:

a) Comply with and enforce compliance with the law wherever Ezentis is present.

b) Promote ethical behaviour that is consistent with corporate values and with the human rights set out in the United Nations Universal Declaration of Human Rights.

c) Ensure compliance with the provisions of the International Labour Organisation in relation to minors, not allowing any type of child labour, forced or compulsory labour.

d) To create a flexible working environment, adapted to the needs of each employee and establishing appropriate measures that favour the reconciliation of work, personal and family life.

e) Reject any conduct that is intimidating, offensive or disrespectful of workers' rights, as well as any manifestation of sexual or moral harassment or abuse of authority of any kind.


f) Respect freedom of association and collective bargaining.

g) Not to discriminate against people on any grounds (religious, political or trade union ideas, nationality, language, sex, marital status, race, ethnicity, age or disability).

h) To protect people's health.

i) Contribute to the socio-economic development of local communities, with special attention to the most vulnerable communities such as indigenous populations.





In order to adequately monitor and supervise compliance with the commitments set out above, Grupo Ezentis has implemented a management model which, in general terms, includes the following Due Diligence phases:

- **Public commitment:** Review, updating and dissemination of this Policy to all the employees of Grupo Ezentis and other stakeholders, and accessibility through its publication on the company's website.
- **Specific risk analysis:** Implementation and updating of a risk analysis in processes or activities where human rights violations could potentially occur. This risk analysis also applies to the main processes of relations with third parties and in the acquisition or incorporation of new companies into the Group.
- **Communication mechanisms in the event of detecting any violation of human rights:** Whistle-blowing channel set up on the company's website, as well as by post to the attention of the Chairman of the Ethics Committee: P.O. Box 14867, 28080 Madrid; or by e-mail: canaldedenuncias@ezentis.com.
- **Evaluation and resolution:** Involvement of the Ethics Committee in the analysis and resolution of the complaints received.
- **Accountability:** Reporting of human rights violations in the Non-Financial Information Statement of (Consolidated Management Report).

5. MONITORING AND SUPERVISION

The Board of Directors of Grupo Ezentis, S.A. is the body responsible for the approval of the Group's Human Rights Policy and, therefore for overseeing compliance with the principles and commitments set out in this regulatory framework.

The Appointments and Remuneration Committee has previously reviewed and reported favourably on the approval of this Policy. The Appointments and Remuneration Committee will therefore be the body responsible for periodically supervising the performance and monitoring the Ezentis Group's compliance with human rights.

The results of the application of this Policy, the evolution of stakeholder expectations, the company's strategy and current human rights regulations will be reflected annually in the Non-Financial Information Statement and in the Sustainability Report.

Without prejudice to the foregoing, this Policy will be developed and complemented with the different policies approved in the Group that are directly related to the principles of action defined in point 4.

The Human Rights Policy shall be disseminated within the organisation and to stakeholders, ensuring that it is available, updated and known to all stakeholders.



6. APPROVAL AND REVIEW

This Human Rights Policy was approved by the Board of Directors of the Company on 26 March 2021, will remain in force indefinitely and will be published on the Company's corporate website. Its content will be subject to periodic review, with any changes or modifications deemed appropriate.

In accordance with the provisions of the Board Regulations, the Board of Directors of the Company shall be periodically informed by the Appointments and Remuneration Committee as to the application of this Policy, the supervision of compliance with its general action principles, as well as the verification of the maintenance of the main relations of the Company with its stakeholders.





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