



ALEATICA

DSA-POLI-09 HUMAN RIGHTS POLICY

Policy Owner:**Reviewed by:**

Executive Management of
Sustainability and User
Attention

CEO

Approved by:

Date: March 8th, 2023
ALEATICA Board of Directors

Scope:

This shall apply to all of the companies in which ALEATICA SAU or ALEATICA SAB have a controlling interest. For those companies in which ALEATICA has an interest and where it has appointed a member of its governing body, such members shall propose that measures be taken which are similar to those stated herein and shall report to the keeper of this document on whether the investee company has taken measures that are comparable to those established here or adopted the latter.

Classification of the document:

Public

Change tracking

Review	Section	Brief description of the change
02		Change in the Normative Code to reflect that the Norm owner is the Sustainability and User Attention Function. Alignment with the content of the second pillar of the Guiding Principles for businesses and human rights, and to ensure compliance with the international legal framework in this regard.

Related and applicable documentation

	Code of Ethics and Conduct
DCR-POLI-02	Anti-corruption Policy
DPM-POLI-01	Regulatory and Quality Control Policy
RHS-POLI-02	Human Resources Policy

HUMAN RIGHTS POLICY

The purpose of this Policy is to establish ALEATICA's commitment to Human Rights and the introduction of management processes that allow to prevent and, where appropriate, mitigate negative impacts on them.

Our guiding principles are:

The ALEATICA Human Rights Policy is based on the results of a set of previously undertaken work that has made it possible to identify and prioritize the Principles to which the company commits:

- a. ALEATICA recognizes that its activities can have an impact on all the human rights of people. This includes human rights recognized in the legal framework of each country, the International Bill of Human Rights¹, and the principles related to the fundamental rights established in the ILO Declaration on Fundamental Principles and Rights at Work.
- b. Analysis of the country risk in the locations where it operates, based on public indicators provided by benchmark organizations and institutions in the area of human rights.
- c. Internal dialogue between the individuals ultimately responsible within the company in different spheres of action, to understand their perception of the risk of breach.
- d. Consultation with human rights experts to address risks or situations that may have a negative impact on human rights.
- e. Significant participation with the people who may be affected by the company's activity.
- f. Diligent action by all members of ALEATICA to avoid causing adverse impacts on human rights.

To operate based on the principles indicated above, ALEATICA has assumed the following commitments:

Human Rights Commitment

ALEATICA expressly declares through this Policy its commitment to respecting the human rights of the people who form part of the company, its supply chain and the communities that may be affected by the company's activity.

¹ The International Bill of Human Rights involves the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights.

This commitment is stated publically through its adhesion to the primary initiatives and directives in this regard, namely:

- The Universal Declaration of Human Rights
- The United Nations Global Compact
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- The OECD Guidelines for Multinational Enterprises
- The UN Guiding Principles on Businesses and Human Rights

Awareness Commitment

According with the Annual Sustainability Training Program, provide human rights training to workers, suppliers, and different stakeholders.

Due Diligence in Human Rights Commitment

ALEATICA shall manage the adverse impact it may cause on human rights and those resulting from collaborations with third parties, including suppliers and subcontracted personnel, through a due diligence process for human rights. This ongoing management process shall be aimed at preventing, halting, mitigating and, if applicable, repairing the negative impact on human rights.

ALEATICA shall perform due diligence processes to identify, prevent and manage human rights violations in accordance with the UN Guiding Principles on Businesses and Human Rights and the OECD Guidelines for Multinational Enterprises.

Due diligence for human rights shall consist of:

- Identification of adverse impacts on human rights, whether realized or otherwise.
- Assessment of the adverse impacts based on their scale, scope and correction with the affected party.
- Preparation of measures aimed at improving adverse effects through prevention, elimination or mitigation of the impact.
- Verification and follow-up on the implementation of measures and their results.
- Communication of how adverse impacts on human rights are addressed with the affected parties.
- Reparation of the damages caused in accordance with the guidance of experts in the field of Human Rights.

Implementation Commitment

Application of the ALEATICA Human Rights Policy shall be included in overall management across all levels of the operation.

The company's Controlling Bodies (Audit Function, Compliance Function and ESG Committee) are the highest bodies responsible for ensuring ALEATICA's compliance with human rights in accordance with this Policy, and they assume follow-up and control functions through the company's Internal Audit Executive and Compliance and Risks Executive Department.

Identification of Human Rights Violations Commitment

ALEATICA, through its ethics reporting channel, facilitates communication of any situation that may represent a violation of the principles and a breach of this Policy. The Ethics Channel has established a process for receiving and attending to claims related to adverse impacts caused by ALEATICA or impacts it has been a contributor to through its supply chain.

The process for attending to claims must be legal, accessible, predictable, fair, transparent, compatible with the rights, and be a source of ongoing learning and be based on participation and dialogue.

ALEATICA's investigation and attention process for claims related to adverse effects on human rights must not impede access to legal or out-of-court mechanisms, and must protect the victims or reporting parties from repercussions.

The measures used to repair adverse impacts on human rights must be focused on reestablishing the situation to the status it was in prior to the impact, in proportion to the scale of the impact, and considering the expectations of the affected parties.

Scope of the Human Rights Policy Commitment

Without prejudice to its responsibility to respect internationally recognized human rights, ALEATICA commits to including the following actions in all its operations:

- **Eradicate modern slavery:** ALEATICA applies a zero-tolerance policy on modern slavery, human trafficking, and any other form of forced labor in the communities where it operates (including the supply chain).

ALEATICA opposes all forms of slavery and human trafficking and does not tolerate it in any part of its business, this includes, but is not limited to:

- i. Engaging in any form of human trafficking,
- ii. Procuring commercial sex acts,
- iii. Use forced labor in the performance of any work,
- iv. Destroying, concealing, seizing, or otherwise denying an individual access to the individual's identity or immigration documents and,
- v. The use of deceptive or fraudulent practices during the recruitment of candidates or the offer of jobs/contracts.

- **Forced labor:** ALEATICA commits to creating employment that is freely chosen and agrees to not use forced or mandatory labor in any of its forms. Along this same line, it will support the eradication of forced labor in its supply chain, and with its suppliers and contractors.
- **Equality and fighting against discrimination:** ALEATICA promote equal opportunities and commits to making the required means and resources available to all its collaborators so that they can experience professional and personal development under conditions of equality, expressly prohibiting all types of

discrimination (gender, race, sexual orientation, disability or any other condition subject to discrimination).

- **Offer decent work:** ALEATICA offers all of its employees, suppliers and contractors decent employment, based on their abilities, responsibilities and functions, and is committed to the ILO guidelines.
- **ALEATICA applies the same labor standards and rights to migrant workers and their families:** ALEATICA understands the importance of having fair and transparent hiring processes, and is committed to ensuring that migrant workers are informed of their rights, both verbally and in writing, at the time they are contracted.
- **Ensure fair and satisfactory working conditions:** ALEATICA respects human rights in the countries where the company operates. As a result, the company is committed to providing the necessary means and to implementing and communicating best practices related to health and labor risk prevention.
- **Respect for minorities and indigenous communities:** ALEATICA respects the rights of minorities, indigenous communities and all marginalized communities in all of the environments in which it operates, and it agrees to work and engage in dialogue with these communities to minimize negative impacts on these communities and their way of life, acting within the existing legal framework, at both the national and international level.
- **Encourage freedom of association and collective negotiation:** The company promotes and respects the right to association and collective negotiation in the labor environment and agrees to not interfere with the free and voluntary adhesion of its workers to legal union organizations or to adopt discriminatory measures for this reason.
- **Eradicate child labor:** Hiring of minors is expressly regulated by the company's policy in accordance with the ILO agreements that regulate the minimum working age. ALEATICA shall not tolerate the contracting of children or adolescents under the legal working age in its supply chain, suppliers or contractors.
- **Protect the environment:** ALEATICA is committed to respecting people's right to enjoy a healthy environment that is risk-free, clean, healthy and sustainable.
- **Protect the safety and wellbeing of personnel in the context of security services companies:** ALEATICA agrees to comply with the Voluntary Principles on Security and Human Rights for surveillance and physical security services. The company agrees to provide working facilities and overnight facilities, when applicable, in conditions of appropriate safety, wellness and hygiene that meet the applicable requirements for safety, space, temperature, lighting, ventilation, drinking water and restroom facilities.