



# CABLERIAS GROUP



## HUMAN RIGHTS POLICY

December 2022

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## 1. Introduction

The violation of human rights is a current risk in today's workplace. It is an obstacle to economic and social development, it weakens the rule of law and is detrimental to the market and to corporate reputation. Cablerías Group (or "Group") and the companies in which it has control have the strong commitment to ensure that the activities carried out for the development of its business comply with the principles of its Code of Ethics and Conduct, with this Human Rights Policy (hereinafter the "Policy"), and with the applicable laws in all the countries in which it operates, particularly with those laws and principles related to human rights.

Cablerías Group is committed to the Ten Principles of the United Nations Global Compact. This Global Compact is a practical framework for developing, implementing and promoting corporate social responsibility policies and practices regarding human rights, labor standards, the environment and anti-corruption.

The purpose of this Policy is to outline and establish the general parameters of action that should govern the daily activity of Cablerías Group, and thereby send a strong message of opposition to the violation of human rights in all its manifestations, unequivocally conveying the Group's willingness to comply with international best practices in this area.

This policy develops the internal regulations on human rights already established in the Code of Ethics and Conduct.




## 2. Scope of application


This Policy will be applicable to employees, managers and members of the administrative entities of Cablerías Group. Similarly, it will be applied in those companies in which Cablerías Group participates, and where it does not maintain control, the company will promote the application of the Policy in the context of its participation in the administrative bodies.

Everyone belonging to Cablerías Group will have the obligation to know, understand and comply with the provisions set forth in this Policy, for which purpose its commitment and principles will be disseminated. In addition, the Company promotes respect for human rights among its suppliers and business partners.




## 3. Commitment

**Cablerías Group commits to respect and not be complicit in the violation of internationally recognized human rights and, in particular, those mentioned in:**

 **The International Bill of Human Rights**, consisting of the following instruments adopted by the General Assembly of the United Nations: the Universal Declaration of Human Rights of December 10, 1948, the International Covenant on Civil and Political Rights and its two protocols issued on December 16, 1966, as well as the International Covenant on Economic, Social and Cultural Rights of December 16, 1966. The International Labor Organization Declaration on Fundamental Principles and Rights at Work adopted by the International Labor Conference on June 18, 1998.

 **The Tripartite Declaration of the International Labor Organization (ILO)** concerning Multinational Enterprises and Social Policy adopted by the Governing Body of the International Labor Office in November 1977.

Likewise, the company undertakes to strictly comply with the applicable regulations, in accordance with the highest ethical standards and professional conduct, including:

-  **The Guiding Principles on Business and Human Rights** endorsed by the United Nations on June 16, 2011.
-  **The Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises of 1976**, in its latest revision.
-  **Principles of the United Nations Global Compact** announced at its 1999 annual meeting.

Furthermore, Cablerías Group is committed to assume the responsibility to protect, respect and compensate in case of violation of human rights caused, directly or indirectly, because of its activity, as well as to implement monitoring processes in order to ensure compliance.

## 4. Principles





The following is a list of the fundamental principles regarding human rights assumed by Cablerías Group in the development of its activity:

### 4.1. Labor principles



#### Fair working conditions

Cablerías Group strictly complies with the labor legislation applicable in each of the regions in which it operates, particularly:

-  It adjusts salaries and labor benefits to the applicable legislation in the corresponding territory and sector of activity with the aim of generating the greatest possible benefit to its employees and guaranteeing a level of social coverage.
-  It guarantees work-life balance.
-  The company ensures the maintenance of the employee's job in cases of maternity or paternity leave.
-  Cablerías protects the privacy and reputation of its employees. It promotes the personal and professional development of its staff.

**Equality and non-discrimination**

Cablerías Group explicitly agrees not to discriminate on the basis of age, sex (including pregnancy or maternity, gender identity and / or sexual orientation), nationality and race, religion, political ideology, disability, or any other personal, physical or social condition of people.

Similarly, it will maintain a rigorous and objective recruitment policy, based exclusively on the academic, personal and professional merits of the candidates and the needs of the Group. In particular, it will promote gender equality, especially in access to employment and internal promotion.

Cablerías Group promotes employees' professional development through training plans that guarantee equal opportunities and career development, actively contributing to achieve the Group's goals.

**Proper treatment of people**

Cablerías Group ensures a working environment in which trust and mutual respect prevail for all its staff, rejecting any kind of unequal treatment or any form of harassment, threat or intimidation in the workplace.

**Eradication of Forced Labor and Other Forms of Modern Slavery**

Cablerías Group respects the freedom of its workers to terminate their labor relationship. Under no circumstances does it resort to forced or compulsory labor, understood as any work or service demanded of an individual under the threat of any kind of penalty and for which said individual does not offer him/herself voluntarily.

**Rejection of Child Labor**

Cablerías Group respects the rights of children, and consequently rejects child labor. Cablerías Group complies with the legislation in force in the countries where it operates and, in any case, with ILO Convention 138 on the minimum working age.

**Occupational Health and Safety**

Cablerías Group ensures that the strictest occupational health and safety conditions are respected in the workplace, in the form of specific action plans and commitments applicable to all parties involved, regardless of their role within the company.

Cablerías Group also provides its personnel with information on the risks existing in their workplace, as well as on the internal procedures and rules established to mitigate and/or eliminate them.

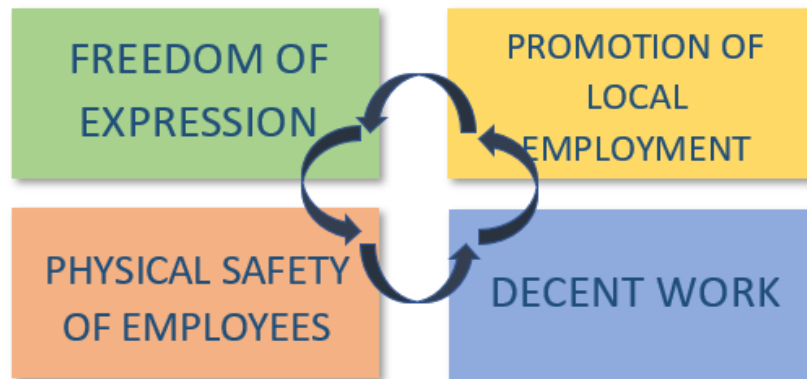
**Freedom of Association and the Right to Collective Negotiations**

Cablerías Group respects the principle of freedom of association and the right of employees to choose for themselves whether they want to join or be part of trade unions or other similar organizations.

Cablerías Group respects the right of its employees to appoint their representatives in accordance with the applicable regulations, and works together with them.



#### 4.2. Environment-related Principles



##### **Employees' freedom of expression and opinion**

Cablerías Group respects the right of individuals to express verbally, in writing or symbolically, their concerns, perceptions and ideas about the context and reality in which they live. It seeks dialogue as an instrument for the solution of internal differences that may arise due to opposing or conflicting opinions.

##### **Promotion of local employment**

Cablerías Group contributes to the economic and social growth of the communities where it operates through the creation of stable sources of employment and collaboration with local agents in those aspects in which it can add value.

##### **Physical safety of employees**

Cablerías Group is committed to ensure the physical protection of employees, especially of those who are at risk of social exclusion.

##### **Decent work and migrant's rights**

Cablerías Group is aware of the vulnerable condition of migrants and their families, as well as their legal status, and offers development opportunities respecting their rights and guaranteeing dignified work.

## 5. Non-compliance and Reporting Channel

In the event that there are reasonable indications that any irregularity, illegal act or violation of the principles of action established in the Code of Ethics and Conduct or in the present Policy has been committed, the hierarchical superior shall be informed or, if the circumstances require it, HR shall be informed through the channels established in the Code of Ethics and Conduct.

Any doubts or queries regarding compliance, application or interpretation of this Policy should be notified to Human Resources, through the e-mail address [rrhh@cableriasgroup.com](mailto:rrhh@cableriasgroup.com).

## 6. Monitoring and Control

The Human Resources Management will be responsible for compliance with the Policy, ensuring the fulfillment of the principles contained therein, applicable in all areas of the company.

## 7. Approval

This Policy has been approved by the Board of Directors of the Company and any modification of the same shall require the consent of said body.

This Policy shall be revised and updated when necessary, so as to adapt it to the evolution of the legal, social or economic reality taking place at any given time.

## 8. Document modification history

EDITION Nº	DATE	MODIFICATION DETAILS	AUTHORSHIP
1	18/12/2020	Document creation	Araitz Otazo
2	20/12/2022	Revision and update	Andrea Garriga