SUSTAINABILITY POLICY



2022 Update



TABLE OF CONTENTS

Introductio	n3
Glossary	
Commitme	nts4
1. Hun	nan Rights
1.1.	Equality and Non-discrimination4
1.2.	Dignified Treatment
1.3.	Association Freedom and Rights to Collective Labor Agreements 4
1.4.	Upstream and Downstream Analysis
2. Labo	or Regulations
2.1.	Fair Working Conditions
2.2.	Eradication of Forced Labor5
2.3.	Rejection of Child Labor5
2.4.	Occupational Health and Safety5
2.5.	Dialogue with Stakeholders5
3. Envi	ronment6
4. Anti	-corruption7
4.1.	Business Ethics and Responsibility7
4.2.	Financial Strength and Long-term Focus7
4.3.	Operational Excellence and Innovation7
4.4.	Transparency and Accountability7
5. Doc	ument Modification history



Introduction

Cablerías Group is an agent that operates in a changing economic and social environment, in accordance with a society in which environmental concern is growing. Understanding that it is necessary to move in the same direction as a whole, Cablerías Group has to recognize its own impact, then analyze it and create a plan of actions and strategies to reduce it. This process begins with the present Sustainability and Environmental Policy, which contains the main points to be taken into account by the group.

Glossary

- <u>Sustainability</u>. According to the definition given by the 1987 United Nations Brundtland Commission, it is what makes possible to meet the needs of the present without compromising the ability of future generations to fulfill their own.
- <u>Sustainable Development Goals</u>. Set forth in the 2030 Agenda drawn up by the UN; these are 17 goals and 169 targets that all together seek to constitute a comprehensive action plan to eradicate poverty and ensure sustainable development in an integrated and balanced manner.
- <u>UN Global Compact</u>. An initiative to promote Sustainable Development and Corporate Social Responsibility.
- <u>Forced labor</u>. It is defined as any work or service imposed on an individual under the threat of any kind of penalty and for which the individual does not volunteer.



Commitments

The following are the commitments of Cablerías Group in accordance with the structure of the UN Global Compact:

1. Human Rights

1.1. Equality and Non-discrimination

Cablerías Group has no tolerance for any kind of discrimination, either by 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.

1.2. Dignified Treatment

Any type of harassment, threat or intimidation that takes place in the workplace is condemned, as Cablerías strives for a work environment in which trust, and mutual respect prevail.

1.3. Association Freedom and Rights to Collective Labor Agreements

As stated in the company's Human Rights Policy, freedom of association and the right of employees to belong to a union or other organization must be respected at all times and without exception.

1.4. Upstream and Downstream Analysis

All stages of the Cablerías Group's supply chain respect Human Rights, both in the procurement, processing, marketing and use of raw materials and/or finished products.



2. Labor Regulations

2.1. Fair Working Conditions

Cablerías Group understands that its staff is a key part of the development of its daily activities and that ensuring that employees feel fairly rewarded is essential to maintain motivation and ensure work-life balance.

2.2. Eradication of Forced Labor

It is fundamental to ensure the freedom of any employee to terminate his or her employment relationship when he or she deems it appropriate. Under no circumstances shall the use of forced or mandatory labor be permitted.

2.3. Rejection of Child Labor

Cablerías Group's commitment to children's rights and to ILO Convention 138 on minimum working age is not limited to its own company, as it will require its suppliers to act accordingly.

2.4. Occupational Health and Safety

Cablerías Group has a thorough network of specific action plans and commitments applicable to all employees, regardless of their function within the company. It is committed to the right of its workers to know the potential risks of their workplace, as well as the internal procedures and rules established to mitigate them. In turn, the Cablerías Group staff must properly follow these instructions.

2.5. Dialogue with Stakeholders

The Company maintains communication and dialogue channels with all stakeholders in order to meet their needs and expectations.



3. Environment

Being aware that every activity has an impact on the environment and that it is in the hands of each company the calculation, analysis and commitment to reduce the adverse effects it may have, Cablerías Group is committed to analyze all environmental matters that are relevant and to respond accordingly.

The Company aims at preserving the environment, developing actions of continuous improvement in several areas, among which are the following:

- Reduction of greenhouse gas emissions and carbon footprint.
- The pursuit of energy efficiency and promotion of the use of green energy.
- Reduction of natural resource consumption.
- Control of the use and disposal of potentially hazardous chemical substances.
- Reduction of waste along the production chain.
- Increase of environmental requirements to our suppliers.

All these points must be included in the Environmental Management System in order to guarantee the company's monitoring and commitment.

This Sustainability Policy serves as a framework for Cablerías Group's environmental and sustainability objectives.



4. Anti-corruption

4.1. Business Ethics and Responsibility

Ethical and responsible actions are promoted in the organization, facilitating preventive and control mechanisms to ensure compliance with the Group's policies and standards within the legal framework of the countries where it operates. As a basic minimum, respect for the rights recognized in the Declaration of Human Rights and in the Principles of the United Nations Global Compact is assumed.

4.2. Financial Strength and Long-term Focus

One of the Company's objectives is to ensure sustained economic growth over time, based on trustworthy and long-lasting relationships with customers, financial strength, profitability and prudent risk management.

4.3. Operational Excellence and Innovation

Efficiency and continuous improvement in management and operations are encouraged, in order to optimize the Group's resources —such as processes, technology and human talent—and therefore offer superior quality products and services.

In addition, the Company shall invest in R&D&I to increase the Group's capacity to offer value-added solutions to customers, especially in weight reduction and vehicle safety improvement.

4.4. Transparency and Accountability

To provide information in a transparent, truthful and rigorous manner to all stakeholders who require it.



5. Document Modification History

EDITION	DATE	MODIFICATION DETAILS	AUTHORSHIP
1	17/01/2021	Document creation	Javier Surís
2	09/12/2022	General revision, update and improvement	Cristina Vede