

1. SUBJECT

At the ALUDEC Group we are aware of the impact that our activity can have on our surroundings. Not only on those closest to us where it is more directly reflected, but also on those environments that are indirectly altered by our actions.

Understanding all action as a fact that implies movement or change, from our inception we have understood the need to move in order to change things. Consequently, the demands we have placed on ourselves are the best reflection of our strong desire to avoid any harmful effects to the environment.

We do not understand or tolerate growth as something that generates inequalities or negative effects on people or the environment. Growth, on the contrary, must contribute to the development of a fairer, less unequal and more respectful society.

For this reason, this Policy aims to reflect all those values that have brought us this far, not only as a mere declaration of intent, but also as a commitment that the management of the GROUP wishes to convey to all our employees, suppliers and customers. Because we understand that only through the closest cooperation by all of us can we achieve the highest levels of well-being.

This Human Rights Policy has been developed in accordance with the United Nations Guiding Principles (UNGPs) on Business and Human Rights, as well as the agreements and commitments that the ALUDEC Group has assumed as necessary to achieve our objectives:

- United Nations Universal Declaration of Human Rights
- United Nations International Covenant on Economic, Social and Cultural Rights.
- United Nations International Covenant on Civil and Political Rights.
- United Nations Global Compact.
- Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises.
- Fundamental Conventions of the International Labour Organisation (ILO).
- United Nations Convention on the Rights of the Child.
- United Nations Convention on the Rights of Persons with Disabilities.

Understanding the need to involve all workers who are part of our value chain, whether they provide their services directly for the companies that make up the ALUDEC Group or for any of the companies that, either directly or indirectly, participate in some way in our corporate purpose, they must all be aware of and understand the Human Rights Policy. It must be strictly adhered to by all workers.

Due to the international nature of the ALUDEC Group, with a presence in more than eight countries and three continents, as well as exporting all over the world, our experience with different legal systems and working and socio-cultural environments has led us to develop our own framework which, while respecting the law in force in each country, encourages the adoption of more demanding measures in those countries with less interventionist regulatory frameworks.

2. GUIDING PRINCIPLES OF THE HUMAN RIGHTS POLICY

The responsibility assumed by the ALUDEC Group, and which all of the GROUP's collaborating companies also assume and accept, means that it must not infringe the human rights of third parties and must accept responsibility for any negative consequences that its actions may have caused to them. Therefore, the following principles are followed in every action that we carry out at the ALUDEC Group:

- a. To establish concrete and specific commitments on human rights and integrate them into the company's business model.
- b. b) To gauge the risks and potential impacts on human rights that the company's activities could cause. We must take into account both our own risks and those of third parties.
- c. c) While prevention should be at the forefront of any action, we must put in place reparation mechanisms to mitigate negative impacts if they occur.
- d. d) To promote respect for human rights and raise awareness of this issue among all the people who form part of the GROUP.
- e. e) To require that our business partners undertake to guarantee that the ALUDEC Group respects and complies with human rights, by promoting respect for them in the course of their business.
- f. f) To establish internal controls to ensure respect for



human rights. At ALUDEC Group we put this principle into practice transparently way through non-financial information statements.

Regardless of the requirements that the governments of the different countries in which the companies that make up the ALUDEC Group carry out their businesses have freely and sovereignly established in terms of human rights within their legal systems, we assume the duty to guarantee and support the fulfilment of human rights throughout our corporate activity.

3- OUR COMMITMENT TO SOCIETY

Knowing that we are not perfect, we are committed to pursue excellence in every step we take, no matter how small. Both for the workers who work directly in the GROUP's companies and for those who indirectly provide their services to the companies that make up the GROUP, the ALUDEC Group is committed to guaranteeing a respectful and healthy working environment that guarantees human dignity above any private interest.

Child labour:

Child labour not only deprives children of their right to education and play, it also exposes them to abuse and violence, and perpetuates cycles of poverty and inequality. For this reason, the ALUDEC Group prohibits all forms of child labour. Either through direct employment in any of our companies or through any of our business partners and/or third parties.

Therefore, the employment of any person under 15 years of age is strictly prohibited. However, if the labour regulations of the country in which the business is carried out are more demanding, they shall apply.

Modern slavery:

Modern slavery is a complex crime that often crosses borders and jurisdictions undetected, penetrating various sectors and businesses. Our commitment to its eradication requires a duty of vigilance by all those involved (Group companies, suppliers, customers, etc.) in order to detect those attitudes that represent exploitation through deception and/or violence against people to force them to work against their will.

Any of the following actions are examples of what we at the ALUDEC Group consider to be modern slavery and are, of course, strictly prohibited:

- Confiscation of identity documents, passports or educational certificates.
- Physical and sexual violence.
- Debt bondage. That is, loans that must be repaid before the employee can terminate their contract.
- Restriction of movement. This is understood as not allowing employees to leave the company's premises.

Conditions of employment contracts:

All workers have the right to decent conditions that, at least, comply with all applicable legal requirements in the country where the business is carried out. In addition, all workers have the right to be provided with information about their working conditions in clear and easily understandable language.

Freedom of association:

All workers have the right to form an association and to associate to represent their interests as employees, to organise and to bargain collectively or individually. Employees also have the right not to join a trade union.

If any restriction on the right to freedom of association or collective bargaining is established under local law, alternative forms of representation, association and bargaining must be established internally.

Both the companies that make up the ALUDEC Group and any of the GROUP's business partner companies must guarantee that no workers suffer any reprisals in the legitimate exercise of their right to freedom of association, to strike or to negotiate their working conditions individually.

Wages and benefits:

In accordance with the regulations in force in each country, employees must be clearly and transparently informed of the wages and benefits to which they are entitled according to their professional category. In all instances, these wages may never be lower than those fixed by law or agreed by collective or individual bargaining.



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The absence of a living wage in the supply chain is not only contrary to the values of the ALUDEC Group, but also limits the positive effects that efforts to ensure sustainable and responsible supply chains are intended to have.

Working hours:

The ALUDEC Group will ensure strict compliance with the legally permitted working hours, both by the companies that make up the GROUP and by those that form part of its value chain (customers, suppliers, etc.). Specifically, but not exclusively, a minimum rest period between working shifts must be guaranteed to ensure the health and safety of workers and the compensation they have earned for the extra hours worked.

Health and safety at work:

Committed to the well-being of our workers, the ALUDEC Group has established all the necessary measures to guarantee the safety of our workers. In addition to creating action protocols to ensure a healthy environment, regular reviews and checks are carried out to examine the effectiveness of the measures implemented.

The ALUDEC Group aims to exceed the legally required minimum standards and we also require the same commitment to excellence from all participants in our value chain.

Equality, diversity and non-discrimination:

Any discrimination based on gender, race, religion, sexual orientation, political opinion, social origin, trade union membership or any other personal or social condition or circumstance is prohibited.

Regardless of the laws that may exist in the country in which the business is carried out, constant and proactive work must be done, through the establishment of internal policies, in order to guarantee the practical application of the principles of equality and non-discrimination. The ability and performance of workers should be the sole determining factors when considering their promotion.

Women's rights:

Aware of the barriers that have been overcome and those that remain in terms of equality between men and women, the ALUDEC Group has worked and will continue to work tirelessly to apply the principles set out in various conven-

tions and agreements for the elimination of all forms of discrimination against women. In this sense, in addition to being able to proudly display the Women Owned Business certification, we have approved the first Aludec S.A. Equality Plan.

Harassment:

Understanding harassment as repeated exposure to a wide variety of negative actions such as abuse, mockery, cruel treatment (both verbal and physical) or sexual harassment, the ALUDEC Group is committed to eradicating any conduct that undermines the dignity of workers. To this end, in addition to fostering a positive culture and eliminating situational factors to prevent harassment, employees (regardless of their hierarchical position) are trained and educated to be able to detect, inform and advise victims through adaptive coping strategies.

Minority and indigenous peoples' rights:

Regarding the rights of people belonging to national or ethnic, religious and/or linguistic minorities, the ALUDEC Group respects and supports the right to the existence and national or ethnic identity of minorities within their respective territories.

Right to land and natural resources:

Understanding natural resources as community assets whose use, access and management are socially defined, the ALUDEC Group believes that this collective dimension is crucial to ensuring the individual enjoyment of this right. Therefore, the obligation to respect natural resources and the environment has not been conceived as a mere objective to reduce our environmental impact, but as an obligation to respect the right to land and resources of society as a whole. ALUDEC is committed to the development of policies and actions aimed at improving people's living resources through the long-term conservation of land and other natural resources.

Private or public security forces:

The growth and expansion of the ALUDEC Group has been based on an analysis of the socio-economic circumstances of the territory in which it has chosen to establish a new centre or headquarters. Respect for human rights within

said territory and respect for the rule of law have been key factors in the growth of the GROUP. Therefore, although the most advanced security systems have been implemented within the organisation in order to guarantee the security and continuity of our business project, the guarantees in terms of human rights and individual liberties within the countries in which we operate have been a determining factor in ensuring that any exceptional deployment of security forces and bodies must not represent a violation of the rights and liberties of individuals.

4. COMPLAINTS

The ALUDEC Group is made up of more than 1,000 workers around the world. Therefore, although our principles are globally known by them as well as by our suppliers and customers, we know that we can only achieve our objectives through the synergies created with all those involved in our value chain.

In order to avoid undesirable practices within the organisation, the ALUDEC Group has created a complaints channel through which both workers and any third parties related to the companies that make up the GROUP can report practices that are contrary to our principles and to the legal system.

Ponte Caldelas - March 23rd, 2023

Ernesto Lumbreras Peláez (Dirección General)