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# Human Rights Policy

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Grupo Catalana Occidente

## Description of the Document

<b>Title</b>	Human Rights Policy
<b>Description of the document</b>	<p>The purpose of this document is to describe the Human Rights Policy of Grupo Catalana Occidente, S.A. and the Entities that comprise it (hereinafter, indistinctly, the "Group" or "GCO").</p> <p>This Policy responds to the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, as well as an increasingly demanding European and national regulatory framework, including the principles of the Global Compact, the UN 2030 Agenda and the UN Sustainable Development Goals (SDGs) the Guiding Principles on Business and Human Rights, and the OECD Sustainability Guidelines for Multinational Companies on Responsible Business Conduct.</p> <p>This Policy is part of the set of Policies that make up the Group's governance system.</p>
<b>Party responsible</b>	Human Resources Department
<b>Frequency of review</b>	Annual, unless circumstances arise that make it advisable to carry out such review in a shorter period.

## Version Control

Version	Carried out by	Validated by	Approved by
1.0	Human Resources Department	Steering Committee	Board of Directors
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### Disclaimer

This document is a translation of its original version in Spanish. In case of discrepancy between both versions

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## 1. General provisions

The Human Resources Department of Grupo Catalana Occidente, S.A. (hereinafter, indistinctly, the "Group" or "GCO") is responsible for this Policy and for its annual updating and review. This Policy has been approved by the Board of Directors of Grupo Catalana Occidente, S.A., and subsequently, the Group's Individual Entities have adhered to it, by means of the corresponding agreement by each of the corporate bodies. The content of the Policy should be reviewed annually, unless circumstances arise that make it advisable to review it in a shorter period. The aforementioned review shall be carried out by the party responsible for the Policy and shall include any amendments that should be incorporated. For the purposes of this review, the party responsible for the Policy shall prepare a report that shall be submitted to the Board of Directors to validate the amendments suggested therein, approving the amendment of the Policy in the sense established by the Board of Directors.

This document is based on GCO's Code of Ethics and its implementing regulations, which sets out the principles and values that govern the actions of the Group and the entities that comprise it. In addition, the commitments and responsibilities assumed in this Policy are aligned with other specific rules and policies, such as the Privacy Policy, Diversity and Equality Policy, Environment and Climate Change Policy, the Protocol for moral or psychological harassment at work, the Protocol for sexual and gender-based harassment, and the Equality Plans of the Group's Entities, among others.

### 1.1. Purpose

Human rights as right to no discrimination, right to fair wages and safe working conditions, rights to privacy, freedom of associations and collective bargaining, freedom from forced and child labour, right to rest and leisure, etc., are universal, meaning that every person in the world deserves to be treated with dignity and have their interests equally valued. While governments have a legal obligation to protect people from human rights abuses, companies also recognise their responsibility to create an environment where human rights are safeguarded.

This Policy expresses GCO's commitment to respect and promote human rights across all of the organisation's activities and processes. Therefore, the Group strives to ensure that there is no abuse or violation of human rights among its stakeholders and is committed to upholding compliance in all its activities and in the regions where it operates.

### 1.2. Scope of application

This Policy applies to GCO and to the Entities that are part of it.

Notwithstanding the foregoing, Entities that, due to their speciality or any other reason, need to adapt this Policy to their specific circumstances may approve an individual policy with the same purpose, while respecting the general framework contained herein.

### 1.3. Policy Governance

The Board of Directors of Grupo Catalana Occidente, S.A., shall be responsible for this Policy, and must approve any changes or substantial reviews. It shall also monitor the effectiveness of this Policy and the commitments contained therein.

In parallel, GCO's Audit Committee is responsible for supervising the Group's performance in relation to Sustainability issues, including this policy and its corresponding and relevant updates. In addition, GCO's Sustainability Committee shall act as coordinator and supervisor of the different issues included in the Policy, ensuring its consistency with the Group's General Policies.

GCO's Human Resources Management is responsible for preparing this Policy and for its annual update and review.

The contents of the Policy shall be reviewed by the GCO Sustainability Committee with an annual periodicity, when circumstances arise that make such a review advisable in a shorter period.

The Board of Directors of Grupo Catalana Occidente, S.A. will approve the reviews of this Policy at the proposal of the GCO Sustainability Committee, and the rest of the Group's Entities described in the "Scope of application" section must take account of them.

### 1.4. Communication of the Policy

This Policy shall be communicated internally and externally. The following communication process is defined:

- Once the Board of Directors of Grupo Catalana Occidente, S.A. has approved the policy or any of its subsequent modifications, the Investor Relations, Rating and Sustainability Unit of GCO shall be in charge of circulating it together with the rest of the Group's Sustainability Policies.
- The Policy shall be published on the Intranet Portals of the Group's Entities so that the entire organisation is aware of it.
- Externally, the Policy shall be published on GCO's corporate website, under the Sustainability section.

## 2. Action framework

GCO's position on human rights is aligned with the main national and international standards:

- Sustainable Development Goals (SDGs) and Agenda 2030 of the United Nations. Specifically, the activity carried out by GCO, and the work conducted from the Occident and Mémora Foundations are aimed at contributing to the following SDGs related to human rights:
  - Goal 1: End of poverty
  - Goal 3: Health and well-being
  - Goal 4: Quality education

- Goal 5: Gender equality
- Goal 8: Decent work and economic growth
- Goal 10: Reducing inequalities
- Goal 11: Sustainable cities and communities
- Goal 13: Climate action
- Goal 16: Peace, justice and strong institutions
- Goal 17: Alliances to achieve the goals.
- The United Nations International Bill of Human Rights, which includes:
  - The Universal Declaration of Human Rights.
  - The International Covenant on Civil and Political Rights.
  - The International Covenant on Economic, Social and Cultural Rights.
- The UN Convention on the Rights of the Child.
- ILO Declaration on Fundamental Principles and Rights at Work.
- United Nations Global Compact Principles.
- United Nations Guiding Principles on Business and Human Rights.
- Organisation for Economic Co-operation and Development (OECD) Sustainability Guidelines for multi-national companies.
- Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU as regards sustainability reporting by companies (CSRD) in accordance with its transposition regulations.
- Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on due diligence by companies in matters of sustainability and amending Directive (EU) 2019/1937 and the Regulation (EU) 2023/2859 (CSDDD Directive), in accordance with its transposition regulations.

### 3. Specific commitments to stakeholders

GCO is committed to refraining from and avoiding complicity in any action that may compromise human rights recognised in both national and international law and included in its internal regulations. To achieve this, it strives to ensure that these fundamental rights are fully respected for and by all its stakeholders, including employees, customers, suppliers and partners, as well as for the well-being and progress of society as a whole.

#### 3.1. Commitments to employees

As part of its commitment to the protection and promotion of human rights, GCO emphasises the fundamental importance of its workforce. For this reason, the Group aims to be a responsible employer, fostering a working environment in which employees' rights are ensured and respected.

Likewise, GCO shall ensure that employees respect and contribute to the Group's compliance with human rights, acting as a first line of defence by showing strict respect for human rights. In addition, employees have a responsibility to ensure compliance with this Policy and the human rights regulatory framework throughout the Group by reporting any potential human rights impacts through available Whistleblowing channels.

### **Avoiding practices that are discriminatory or that undermine the dignity of individuals.**

GCO strives to create an inclusive environment where every individual is valued and treated with respect, rejecting any discriminatory practices or those that undermine the dignity of individuals in the workplace. In this sense, the term 'discrimination' includes any distinction, exclusion or preference based on gender, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, wealth, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or position.

GCO works in all areas of human resources to avoid discrimination and promote an inclusive environment where employees can develop their potential without barriers or prejudice. In addition, it ensures confidential and diligent processes for reporting incidents and for corrective or disciplinary measures.

### **Respecting freedom of association, collective bargaining and trade union rights**

GCO supports the right of association and union representation, allowing employees to join and participate in unions and collective bargaining. Furthermore, the Group maintains an open dialogue with employee organisations and ensures that no employee suffers reprisals or discrimination for being a member of a trade union organisation and/or a works council or participating in its activities.

In addition, the Group promotes the participation of employee representatives in these processes, reporting on relevant issues and the company's situation.

### **Ensuring free labour**

GCO consciously refuses to resort to any form of compulsory or forced labour, understood as any type of work or service that has not been offered voluntarily or that has been obtained under threat or sanction. It is also committed to respecting the freedom of movement of employees, without coercion or undue restrictions, thus promoting a respectful and abuse-free working environment.

Similarly, the Group does not tolerate coercion, harassment, whether physical, psychological, moral, sexual or abuse of authority, and any conduct that intimidates or violates the rights of individuals, including those arising from smuggling, human trafficking or any form of modern slavery. In addition, GCO prohibits the employment of children in its operations and among its suppliers, respecting the provisions of the ILO Convention and the strictest local regulations, advocating the abolition of child labour

### **Protecting the health and safety of employees**

GCO is committed to protecting the health and safety of its employees through preventive measures in accordance with legislation. The company promotes safe and healthy working environments, supported by a health and safety management system that complies with all applicable laws.

To guarantee health and safety, GCO promotes a culture of occupational risk prevention, drafts protocols for the management of illnesses, includes benefits in collective agreements in the event of incapacity for work and creates an Employee Well-Being Plan for comprehensive health care and the reconciliation of personal and professional life.



### **Act as a responsible employer**

GCO is committed to guaranteeing fair and dignified working conditions, promoting equal opportunities and rejecting any form of discrimination. In the same way, the Group ensures a safe and healthy working environment, with flexibility to balance professional and personal life, and fosters well-being and motivation in its teams.

Training and professional development are priorities for GCO, offering continuous training to improve skills and promote professional development. In addition, the company aligns individual skills with professional requirements, periodically assesses performance and encourages internal promotion, innovation and teamwork.

GCO's remuneration system is based on a balance between market standards and internal equity, with criteria that recognise the responsibility and complexity of the tasks, and that allow for the objective levelling of remuneration, guaranteeing the application of the principle of equal pay for work of equal value.

In addition, working hours, rest periods, leave entitlement are subject to local labour legislation and regulation. The Group also strives to provide flexible working hours and to ensure a work-life balance for its employees.

### **Protect freedom of opinion, information and expression, as well as data privacy and confidentiality.**

GCO is committed to ensuring the privacy and confidentiality of its employees, protecting all personal data, including sensitive information such as health and financial data, and respecting the confidentiality of personal communications.

GCO guarantees the security of personal data by implementing appropriate physical, technical and organisational measures to safeguard the information it collects. In addition, personal data will be gathered and processed for specific, explicit and legitimate purposes, in accordance with the purpose and objective informed to the interested party at the time of obtaining the data.

Likewise, GCO ensures the respect for private and family life, for the address and communications, freedom of opinion, freedom of expression and information. In addition, the Group provides channels of communication that protect freedom of expression, without undue restricting, while ensuring the privacy of employees.

## **3.2. Commitments to customers**

GCO is dedicated to building strong, lasting relationships with its customers. These contractual relationships are underpinned by honesty, good faith, trust, transparency, confidentiality and professionalism, ensuring fair and equitable interaction at all times.

In its dealings with customers, GCO not only ensures that its services reflect the highest ethical and quality standards, but also promotes respect for human rights and is committed to identifying and mitigating any possible adverse effects regarding its relationship with them.

### **Rejecting all forms of discrimination**

GCO is committed to treating every customer with dignity, respect and fairness, ensuring fair and unprejudiced treatment, regardless of their individual views or circumstances. In this way, the Group rejects any form of discrimination and guarantees equal access to its products and

services. It also works to remove barriers to accessing information and adapting its processes, as well as training its staff, to ensure that all customers receive a quality level of care and service.

#### **Respecting confidentiality. right to confidentiality and privacy of customer data**

GCO guarantees the lawfulness, fairness and transparency in the processing of personal data, obtaining them in a lawful, transparent manner, providing clear information to data subjects and obtaining their explicit consent when necessary. Purpose limitation is also ensured, so that personal data are collected and processed for specified, explicit and legitimate purposes, informed to the data subject at the time of collection.

Likewise, GCO complies with the rights to access, rectification, suppression and the right to be forgotten, object, restrict processing and data portability data, and undertakes to notify personal data breaches to the supervisory authority and to potential data subjects when a high risk is detected. Furthermore, it limits data retention to the time necessary for their processing and compliance with legal obligations, and ensures data integrity and confidentiality through appropriate technical and organisational measures.

#### **Promoting transparent communication**

GCO promotes transparent communication with customers, ensuring that the information provided is clear, accurate and truthful. In addition, relevant information on products and services must be provided, offering full and honest advice so that customers can make informed decisions.

In addition, commercial practices that may be ambiguous to customers are avoided by ensuring clarity and transparency in the communication of the terms and conditions, benefits, risks and costs associated with each product or service offered. This approach respects the human right to information and self-determination, promoting a relationship of equality and mutual respect.

### **3.3. Commitments to suppliers and partners**

GCO considers its suppliers and partners as key allies in complying with this policy and expects them to implement these values throughout their value chain.

In particular, suppliers and partners shall, both within their companies and in their own value chains (i) take the necessary measures to eliminate all forms of forced labour and any form of modern slavery in their organisation; (ii) expressly reject the use of child labour; (iii) respect the freedom of trade union association and the right to collective bargaining of their employees, (iv) avoid any discriminatory practices based on any condition or characteristic; (v) set the wages of their professionals in accordance with the applicable laws, respecting minimum wages, overtime and social benefits; and (vi) provide a safe and healthy workplace through the adoption of occupational health and safety procedures and regulations.

In the supplier tendering process, the Group facilitates maximum transparency, providing all participants with reliable information and giving opportunities to alternative suppliers. This transparency is aligned with the respect for human rights, as it ensures that business decisions are made without discrimination and with equal opportunities.

### **3.4. Commitments to society**

GCO respects human rights in the wider community, recognising the importance of building relationships of trust and partnership. This commitment is reflected in the implementation of responsible practices that ensure the well-being and dignity of people who may be affected by its operations.

#### **Preserving the environment**

GCO recognises access to a clean, healthy and sustainable environment as a fundamental human right, an essential principle for ensuring the health, well-being and dignity of all people. This recognition is based on the understanding that a healthy environment is crucial to human existence and survival.

Although GCO does not cause a significant environmental impact, it actively works to protect and preserve the environment, promoting a culture of sustainable development and efficient use of resources, managing and measuring the environmental impact of its operations and protecting natural resources for future generations.

#### **Anti-corruption**

Corruption is one of the factors that undermines institutions, weakens justice and compromises the economic and social development of societies. GCO rejects corruption in all its forms, enabling its stakeholders to interact with the Group without fear of the risks arising from misuse of the financial system and other sectors of economic activity. For this, the Group undertakes to conduct all its activities in accordance with the laws in force in all areas of activity and in all countries in which it operates.

#### **Responsible investment**

As a signatory of the United Nations Principles for Responsible Investment (PRI), GCO has joined the commitment to achieve a global, sustainable financial system by incorporating environmental, social and corporate governance (ESG) factors in its investment decisions and in the active exercise of ownership. GCO therefore carefully assesses the social and environmental impact of its investments, ensuring that its actions not only comply with applicable regulations, but also reflect the Group's values and ethical principles.

## **4. Due Diligence on human rights issues**

Due diligence is the process by which GCO takes all necessary and effective measures to identify, prevent, mitigate, account for and respond to actual or potential negative human rights impacts caused by its own activities or those of its value chain.

In order to ensure the proper implementation of this process, GCO has a procedure consisting of the set of steps listed below:

### **1. Cross-cutting integration of due diligence**

The Group and its Entities must integrate the concept of due diligence, observing this policy, into their management systems to specifically address human rights principles and requirements.

## **2. Assessment of adverse human rights impacts**

The Group and its Entities must take appropriate measures to identify and assess actual and potential adverse human rights impacts arising from their own activities or those of their Entities and from their established business relationships.

The assessment of potential adverse impacts or effects shall be carried out on the basis of their severity and likelihood and on an annual basis.

Indicators for measuring human rights may include cases of non-compliance with human rights in the Group, ESG rating of the Group's suppliers according to rating agencies or external sustainability data providers.

## **3. Prevention, mitigation and management measures**

Appropriate measures must be taken to prevent or, where prevention is not possible or not immediately possible, to mitigate the identified potential adverse effects of the infringement of human rights.

The prevention measures defined include the adoption of the GCO Code of Ethics for all employees, agents and collaborators, as well as the inclusion of clauses on compliance with the GCO Code of Ethics, which includes the obligation to safeguard human rights, in contracts with the Group's supplier.

GCO is committed to establishing legitimate and effective mechanisms to mitigate the adverse impacts that it may cause or contribute to generate regarding the human rights of its stakeholders.

## **4. Grievance and remediation mechanisms**

Due diligence seeks to prevent or avoid any potential adverse impact of the Group on human rights, but where harm has already been caused, the harm must be addressed and different actions must be put in place to address the harmed parties. The Group therefore has grievance, remediation and follow-up mechanisms in place to redress harm in accordance with the following guidelines.

The Group should have a Whistleblower Channel so that potentially affected groups can communicate or report any human rights issue and thus set in motion remediation mechanisms as soon as possible. It should be ensured that such a Whistleblower Channel can be used by persons who are or may be affected by an adverse impact, trade unions and other workers' representatives representing the affected groups and civil society organisations active in areas related to the affected groups.

Remedial measures in the event of a proven actual adverse effect should address and investigate the source of the effect in accordance with internal procedures, legal regulations and applicable conventions and if appropriate develop and implement a corrective action plan and take appropriate disciplinary action.