



HUMAN RIGHTS POLICY

May 2024

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1 Introduction

The Senior Management of all companies belonging to Valoriza, S.A. ("Valoriza"), within the framework of its general and non-delegable competence to determine the general policies and strategies of the Company, has approved this Human Rights Policy (hereinafter, the "**Policy**").

The purpose of this *Policy* is to define and establish the principles and mechanisms governing actions in the area of Human Rights, addressed to all stakeholders.

2 Purpose

Respect for Human Rights by VALORIZA and in relation to any stakeholder is a fundamental value in VALORIZA's public commitment.

For years, VALORIZA has recognized the need to respect and ensure respect for Human Rights in all the territories in which it operates. In this sense, VALORIZA's commitment is expressed through this *Policy* committed to the control and monitoring of compliance with Human Rights in relation to the people who work in the organization and on behalf of it, as well as with the various stakeholders with whom it relates in the performance of its activity.

VALORIZA, aware of its national and international responsibility to respect Human Rights, wants to actively and decisively contribute to a sustainable future, ensuring the elimination of any conduct and activities of VALORIZA and its Group companies that are not in line with this *Policy*, promoting all actions within its reach for this purpose.

With this *Policy*, VALORIZA demonstrates its public commitment at the highest level, to assume its responsibility to respect Human Rights, contributing to improve our environment, our society and our future.

3 Scope of Application

This *Policy* applies to all entities belonging to VALORIZA, according to their own characteristics. For the purposes of this document, VALORIZA is considered composed of (i) all subsidiaries or majority owned companies in respect of which, directly or indirectly, effective control is exercised by VALORIZA, S.A. regardless of their geographical location. Therefore, in all references that this *Policy* makes to VALORIZA, shall be understood to include all the companies listed above.

Not included in its scope of application are subsidiaries or minority interests in respect of which is not exercised, either directly or indirectly, effective control by VALORIZA, S.A., which will have, where appropriate, their own policies or internal regulations governing the matter, not being in any case, these may not be contrary to the provisions of this *Policy*.

4 International Framework

This Policy, the actions, procedures, activities and operations of VALORIZA with regard to human rights, are based on the following fundamental values of International and European Law, as well as other international standards on the subject:

1. The International Bill of Human Rights of the United Nations, consisting of:
 - The Universal Declaration of Human Rights (UN, 1948).
 - The International Covenants on Economic, Social and Cultural Rights (UN, 1966).
 - The International Covenant on Civil and Political Rights (UN, 1966).
2. The European Convention on Human Rights.
3. The United Nations Convention on the Rights of the Child.
4. Convention on the Rights of Persons with Disabilities (UN, 2006).
5. The Charter of Fundamental Rights of the European Union (2000).

6. Resolution 48/13 of October 8, 2021 of the United Nations Human Rights Council recognizing the right to a clean, healthy and sustainable environment as a human right.
7. National constitutions and laws recognizing or implementing human rights.
8. Social Accountability Standard SA 8000.

5 General Principles

To achieve the implementation of this commitment, VALORIZA and the other companies belonging to its Group will be guided by the following general principles:

- (a) Identify, prevent, mitigate and account for how it addresses its impact on human rights in all its operations and activities.
- b) Remedy, to the extent possible, any adverse human rights impacts that they have caused or contributed to.
- c) Encourage and promote training and awareness initiatives for VALORIZA's stakeholders on Human Rights.
- d) Actively encourage a culture that promotes respect for Human Rights, as well as behaviors that promote such respect.
- e) Voluntary adherence to public or private agreements in order to make commitments and define actions with the aim of reducing deviant behaviors of this *Policy*.
- f) Obtaining and maintaining certifications in accordance with internationally recognized standards.
- g) Encouraging suppliers to assume the commitment to comply with this *Policy*.

- h) Compliance with applicable requirements related to respect for Human Rights, as well as the monitoring of recommendations on the subject, nationally and internationally.
- i) Active and continuous communication on the actions of VALORIZA in relation to respect for Human Rights.
- j) Respect human rights in the field of children and youth law and, especially, not to take part or support the use of child labor.
- k) Respecting the United Nations Guiding Principles on Business and Human Rights.
- l) Assessment of human rights risks based on the results of corporate and project risk assessments.
- m) Reduce exposure of operations to human rights issues.
- n) Comply with applicable human rights legislation.
- o) Adoption of grievance mechanisms in matters related to Human Rights.
- p) Take appropriate measures to ensure a safe working environment and avoid the use or support of forced or compulsory labor.
- q) Respect the right to freedom of association and the right to collective bargaining.
- r) To prevent any type of discrimination based on race, caste, sex, nationality, religion, disability, gender, sexual orientation, political or union affiliation.

- s) Respect the working day according to regulations or through collective bargaining applicable in each workplace.
- t) Ensure a salary in accordance with what is determined by law or through collective bargaining applicable in each workplace.

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