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HUMAN RIGHTS POLICY

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TABLE OF CONTENTS

1. Introduction	3
2. Purpose	3
3. Scope of Action	3
4. Commitments	3
4.1 Respectful Treatment and Non-Discrimination	3
4.2 Equal Opportunities	4
4.3 Freedom of Association and Collective Bargaining	4
4.4 Decent and Paid Employment	4
4.5 Eradication of Any Form of Child Labour	4
4.6 Eradication of Forced Labour	4
4.7 Occupational Health and Safety	4
4.8 Privacy of Personal Data	5
4.9 Human Rights Training	5
4.10 Commitment to Suppliers and Subcontractors	5
4.11 Respect for Communities and the Environment	5
5. Supervision and Monitoring Systems	6
6. Validity	6

1. Introduction

Copisa Group, hereinafter the "Group", operates in the construction, industrial projects, concessions and maintenance industries. Today, our organisation has a strong presence in the global market, hoping to contribute to the shaping of fairer societies in increasingly sustainable environments. For this reason, in 2010, we joined the United Nations Global Compact, and in 2013 we joined the Spanish Global Compact Network.

One of the Group's main objectives is to create value in all the geographical areas where it is present, acting as an economic and social engine through the development of infrastructures and industry.

As an engine of transformation, innovation fosters our progress in the application of construction processes and new materials, thus making us more efficient and competitive in the development of more sustainable and high-quality infrastructures, contributing to economic progress and to people's well-being.

We aspire to achieve increasingly ambitious goals, such as those currently proposed by the United Nations Development Programme (UNDP) with our contribution to the achievement of its 17 Sustainable Development Goals (SDGs), trying to influence climate change, economic inequality, innovation, sustainable consumption, peace and justice.

2. Purpose

The purpose of this Policy is to formalise the Group's commitment to the respect of human rights contained in the principles on which the United Nations Global Compact, the International Labour Organisation (ILO) conventions, the Sustainable Development Goals (SDGs) approved by the United Nations, and the Group's Code of Ethics and Code of Conduct are based.

3. Scope of Action

This Policy is applicable to all the activities of the subsidiary companies (in which it holds at least 50%) that are part of the Group and to everybody in said companies, regardless of the type of contract that determines their employment relationship, the position they hold or the place where they carry out their work.

4. Commitments

The Group's performance in relation to its stakeholders and the environment is based on compliance with national and international laws and regulations in force in the countries in which it operates. All actions of the Group and its employees shall uphold a scrupulous respect for Human Rights and Public Freedoms and shall be mandatory for all members of the Group.

4.1 Respectful Treatment and Non-Discrimination

The Group must maintain a work environment free from all discrimination and any conduct involving personal harassment. Every worker must be treated fairly and with respect by their superiors, subordinates and colleagues. Any abusive, hostile or offensive conduct, whether verbal or physical, shall not be tolerated.

4.2 Equal Opportunities

The Group fosters the professional and personal development of all its employees, ensuring equal opportunities for the development of their professional careers regardless of their age, sex, marital status, race, nationality, political or union opinions, religion or any other personal, physical or social condition. The selection and promotion of employees is based on the objective criteria of merit and ability.

4.3 Freedom of Association and Collective Bargaining

All the companies that make up the Group guarantee freedom of association and the freedom to form and join trade unions.

4.4 Decent and Paid Employment

The Group guarantees adequate working conditions, decent and paid employment, and ensures its employees maintain a rational work-life balance, along with the management of diversity and equal opportunities, well-being at work, health and safety.

The Group is committed to fair compensation based on the labour market, the training, experience and responsibilities of the worker, and in accordance with the labour agreements and legislation in force in each country.

4.5 Eradication of Any Form of Child Labour

The Group does not tolerate work with minors. The Group endorses and encourages compliance with Human Rights and avoids collaborating with those organisations that violate them. Therefore, it undertakes to respect all the provisions that are issued in this regard by the International Labour Organisation (ILO) and the United Nations Global Compact.

4.6 Eradication of Forced Labour

The Group undertakes not to resort to forced or compulsory labour. Furthermore, the Group shall avoid hiring suppliers, contractors or external collaborators at risk of developing such practices.

4.7 Occupational Health and Safety

The Group shall provide its employees with a safe and stable environment and undertakes to permanently update its occupational risk prevention measures, as well as to scrupulously respect the applicable regulations on this matter, in all places where it carries out its business activities.

All of its employees are responsible for rigorously complying with health and safety regulations. Furthermore, they must responsibly use the equipment assigned to them when they carry out risky activities and shall disseminate knowledge among their colleagues and subordinates and promote compliance with risk protection practices.

4.8 Privacy of Personal Data

The Group undertakes to only request and use the data of its employees that are necessary for the effective management of its businesses or if the data are required by applicable regulations. Furthermore, the Group shall take the necessary measures to preserve the confidentiality of the personal data available to it and to guarantee that the confidentiality in the transmission thereof, when necessary for business reasons, complies with current legislation.

4.9 Human Rights Training

The Group undertakes to disseminate its commitments in the field of human rights, as well as to encourage the implementation of training initiatives among its employees in this field.

4.10 Commitment to Suppliers and Subcontractors

The Group's relationship with suppliers and subcontractors is based on a climate of mutual collaboration based on legality, ethics and transparency. Sharing the Ten Principles of the United Nations Global Compact and maintaining a zero-tolerance policy against possible illicit, criminal acts, situations of fraud or of any other nature in all areas of action.

The Group transfers its values and corporate principles to the supply chain through a specific clause in the signed contracts that require suppliers to declare their knowledge of and commitment to the Group's compliance system.

All employees who participate in the selection processes of contractors, suppliers and external collaborators have the obligation to act impartially and objectively, applying quality and cost considerations and preventing their personal interests from conflicting with those of the company.

4.11 Respect for Communities and the Environment

The Group is committed to socially responsible action, assuming the responsibility of respecting the diversity of cultures and customs and principles in force among the people and communities affected by its activities:

Respect for the rights of minorities: thus, all of the Group's companies must respect the rights of indigenous peoples, ethnic, religious and linguistic minorities, people with disabilities and migrant workers and their families, in accordance with national and international conventions and regulations.

Probity in management: The Group prohibits bribes to authorities and civil servants and forbids its employees from giving or receiving undue payments of any type from third parties, as well as gifts, donations or favours that fall outside of ordinary social use or that, due to their value, characteristics or circumstances, may reasonably represent an alteration to the execution of commercial, administrative or professional relationships in which its companies are involved.

5. Supervision and Monitoring Systems

This Policy, like the rest of the Group's policies, is aligned with the Code of Ethics and Code of Conduct, and with the Group's compliance model.

The Compliance Committee's mission is to ensure knowledge of and compliance with the Code of Conduct and the Code of Ethics, and to resolve any incidents or questions about their interpretation and ensure their fair application in the event of a claim.

Any violation of the Policy must be communicated through the channel established in the Group's Code of Ethics.

6. Validity

This policy has been approved by the Copisa Group Board of Directors on the 8th of February, 2021, and shall remain in force for as long as the Board does not approve the review, update or repeal thereof.