



## HUMAN RIGHTS POLICY

GRUPO COPISA

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| 1.0     | 08-02-2021       | Format Update  |
| 2.0     | 19-12-2022       | 4.3 Freedom of association, opinion and expression; 4.10 inclusion of the Code of Ethics and Conduct for Suppliers; 6 dissemination of Information.                          |
| 2.1     | 10-04-2025       | 4.4 Update to content on working hours; 4.10 update to the list of policies. Application of inclusive language. 5 location of the Ethical Channel. Update of logo and seals. |

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## **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 formalize the Group's commitment to the respect of human rights contained in the principles on which the United Nations Global Compact, the International Labour Organization (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, opinion and expression**

The Group recognizes the fundamental right of employees to form and join trade unions or representative bodies. It also guarantees respect for freedom of opinion, the exercise of trade union activity and collective bargaining.

**4.4 Decent and Paid Employment**

The Group guarantees adequate working conditions, promoting decent, safe, and compensated employment, in line with its commitment to Human and labor Rights. A comprehensive approach is adopted to promote:

- Work-life balance.
- Diversity management and equal opportunities.
- Well-being at work, including occupational health and safety.

All individuals within our organization carry out their professional activities under conditions that fully respect the legal limits established regarding working hours, rest periods, and vacation time.

Our organizational model prioritizes the creation of a healthy and balanced work environment, encouraging rational schedules and flexible work arrangements when circumstances allow, and avoiding any practice that involves excessive or unjustified working hours.

In exceptional cases where additional hours are required, these are carried out based on voluntary participation, fair compensation, and always within the legal limits defined by current legislation and applicable sectoral collective agreements.

Furthermore, the Group is committed to ensuring fair remuneration, appropriate to the reference labor market, the training, experience, and level of responsibility of everyone, and in full compliance with collective agreements and the labor laws in force in each country where we operate.

**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 organizations that violate them. Therefore, it undertakes to respect all the provisions that are issued in this regard by the International Labour Organization (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 supplier and subcontractor companies is based on a climate of mutual collaboration founded on legality, ethics, and transparency. It shares the 10 Principles of the United Nations Global Compact and maintains a zero-tolerance policy towards any unlawful acts, criminal behavior, fraud, or other misconduct in all areas of activity.

The Group extends its values and corporate principles to the supply chain through a contractual clause included in signed agreements, which obliges suppliers and subcontractors to commit to and comply with the conditions established in this document. For this purpose, the corporate website <https://www.grupocopisa.com> is made available, where the basic documentation forming the compliance system can be consulted: the Compliance Management Policy, the Code of Ethics and Code of Conduct, the Ethical Channel (whistleblowing channel), the Suppliers' Code of Ethics and Conduct, the Sustainability Policy, and the Human Rights Policy.

All personnel involved in the selection processes of contractors, supplier and subcontractor companies, and external collaborators are required to act with impartiality and objectivity,

applying quality and cost criteria and avoiding any conflict between their personal interests and 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 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, as well as the Group's compliance model.

The Compliance Committee is responsible for ensuring awareness and adherence to the Code of Ethics and Conduct, resolving incidents or questions regarding its interpretation, and ensuring its fair application in complaints.

Any violation of the Policy must be reported through the Ethical Channel established on the corporate website: [www.grupocopisa.com](http://www.grupocopisa.com).

### **6. Dissemination of information**

Copisa Group will promote awareness of this Policy, available on the corporate website [www.grupocopisa.com](http://www.grupocopisa.com) and the internal communication channels for all employees.

### **7. Validity**

This policy has been approved by the Board of Directors of Grupo Copisa on April 10, 2025, and will remain in force until such time as the Board approves its revision, update, or repeal.