



Human Rights Policy

Grupo Catalana Occidente

Description of the Document

Title	Human Rights Policy
Description of the document	<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>
Party responsible	Human Resources Management
Frequency of review	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
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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 Management of Grupo Catalana Occidente, S.A. (hereinafter, indistinctly, the "Group" or "GCO") is responsible for the Human Rights Policy (hereinafter, the "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, Human Resources Policy, Diversity and Equality Policy, Climate Change and Environment Policy, the Protocol for moral or psychological harassment at work, the Protocol for sexual and gender-based harassment, the GCO's Whistleblowing Channel for reporting irregularities and fraud, 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 fundamental rights are safeguarded.

This Policy expresses GCO's commitment to respect and promote human rights across all 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 the GCO's Sustainability Master Plan and its corresponding and relevant updates. For its part, 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 this 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 1.2. "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 Rating, Shareholders 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 (CS3D Directive), in accordance with its transposition regulations.
- Directive (EU) 2025/794 of the European Parliament and of the Council of 14 April 2025, amending Directives (EU) 2022/2464 and (EU) 2024/1760 as regards the dates from which Member States are to apply certain corporate sustainability reporting and due diligence requirements.

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 acknowledges the fundamental importance of its workforce. The Group is dedicated to being a responsible

employer by, fostering a working environment in which employees' rights are respected and upheld.

GCO also ensures that employees understand and actively support the Group's human rights compliance, serving as a first line of defence through ethical and respectful conduct. Employees are equally responsible for adhering to this Policy and the applicable human rights regulatory framework and for reporting any potential human rights impacts through the GCO's Whistleblowing Channel for reporting irregularities and fraud, available on the Group's website.

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, sexual orientation, language, religion, political or other opinion, national or social origin, socioeconomic status, association with a minority, or any other personal characteristics which has the effect of nullifying or impairing equality of opportunity or treatment in the workplace.

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 actively involves employee representatives in decision-making processes by consulting them on relevant topics and regularly updating them on key reports and the company's overall performance.

Ensuring free labour

GCO rejects any form of compulsory or forced labour, defined as any work or service not offered voluntarily or imposed through threat or sanction. It upholds the freedom of movement of employees, ensuring no coercion or undue restrictions, and fostering a respectful and abuse-free workplace.

Similarly, the Group rejects all forms of coercion or harassment, whether physical, psychological, moral, sexual or abuse of authority, or any behaviour that intimidates or violates the rights of individuals. It does not tolerate any behaviour that intimidates or violates individual rights, including those linked to smuggling, human trafficking or any other form of modern slavery. GCO also strictly prohibits child labour in its operations and supply chain, fully complying with 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 inclusive, accessible, safe and healthy working environments, through 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, develops specific protocols for the management of illnesses, includes benefits in collective agreements in the event of incapacity for work and offers an Employee Well-Being Plan aimed at comprehensive health care and facilitating a balance between personal and professional life.

Act as a responsible employer

GCO guarantees fair and dignified working conditions, promoting equal opportunities and rejecting any form of discrimination. In the same way, the Group creates a working environment that supports employee wellbeing through flexible arrangements that balance professional and personal life—and, as well as implementing benefits that address the diverse needs of its workforce.

Training and professional development are priorities for GCO, offering continuous training to strengthen skills, enhance talent, and drive innovation.. In addition, the company aligns individual skills with professional requirements, periodically assesses performance and fosters active participation in professional and personal growth programmes.

GCO's remuneration system is based on a balance between market standards and internal equity, using criteria that recognise the responsibility and complexity of each role. These criteria 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 work arrangements to support a healthy work-life balance for its employees.

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

GCO safeguards the privacy and confidentiality of its employees, protecting all personal data, including special categories of personal data (e.g. health, racial or ethnic, trade union membership, criminal background checks) and sensitive personal data (e.g. financial data, location data), and respecting the confidentiality and privacy 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 communicated to the individual at the time of collection of the data.

GCO also upholds the right to family life, home and communications, freedom of opinion, expression and access to information. The Group provides maintains open communication channels 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 opinions, circumstances or individual characteristics. In this way, the Group rejects any form of discrimination and guarantees equal access to its products and services. Furthermore, the Group works continuously to identify and remove potential barriers that may limit customer satisfaction, through the ongoing review and improvement of its processes, staff training and awareness initiatives, and the adaptation of services and communication channels to ensure accessibility and equal treatment for all individuals.

Respecting confidentiality, right to 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 to their rights and freedoms, in particular their right to personal data protection. 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.

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. Likewise, the Group manages and measures 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 contribute to fulfilling the Group's commitments, thereby reflecting its values and ethical principles **as set out in GCO's Code of ethics**.

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 business relationships.

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

Indicators for measuring human rights may include cases of non-compliance with human rights in the Group and 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's Code of Ethics which sets out the general guidelines that must govern **the conduct of GCO's directors and employees, regardless of their position or level, as well as the Group's network of agents and associates**, as well as the inclusion of sustainability clauses in contracts with the Group's suppliers, which includes the obligation to safeguard human rights.

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 has 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 measures.