



**HUMAN RIGHTS POLICY**  
**POLICY**

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**INDEX**

<b>1. INTRODUCTION.....</b>	<b>2</b>
<b>1.1 PURPOSE .....</b>	<b>2</b>
<b>1.2 SCOPE OF APPLICATION .....</b>	<b>2</b>
<b>2. PRINCIPLES .....</b>	<b>3</b>
<b>3. COMMITMENTS AND PRINCIPLES FOR DIFFERENT STAKEHOLDERS .....</b>	<b>4</b>
<b>4. INTEGRATION.....</b>	<b>5</b>
<b>5. MONITORING AND COMMUNICATION.....</b>	<b>5</b>



# HUMAN RIGHTS POLICY

## POLICY

### 1. INTRODUCTION

Through this Policy, Opdenenergy Holding S.A. and its subsidiaries (hereinafter "Opdenenergy" or the "Organization") commit to supporting and respecting Human Rights as recognized at both national and international levels.

In this regard, this Policy outlines the Organization's commitment to Human Rights during the performance of its activities, ensuring respect for these rights in both internal and external relations.

Furthermore, for the Organization, respect for human rights is an integral part of its values within the broader framework of business activities carried out across all regions and geographies in which it operates.

#### 1.1 PURPOSE

The purpose of this Policy is to reinforce the Organization's commitment to human rights and to ensure their protection in accordance with the highest standards.

Additionally, this Policy complements the Organization's Code of Ethics and the other corporate policies that comprise the Compliance Model.

#### 1.2 SCOPE OF APPLICATION

This Policy applies to all employees of the Organization, its subsidiaries, directors, legal representatives, and any individuals providing services—whether directly employed, collaborators, professionals, or subcontracted entities.

Accordingly, the companies that form part of the Organization must inform the aforementioned parties of the obligation to implement measures equivalent to those set out in this Policy.

## 2. PRINCIPLES

The Organization's commitment to respecting Human Rights is guided by the following international standards:

- Universal Declaration of Human Rights
- International Labour Organization Conventions
- United Nations Global Compact Principles
- Sustainable Development Goals

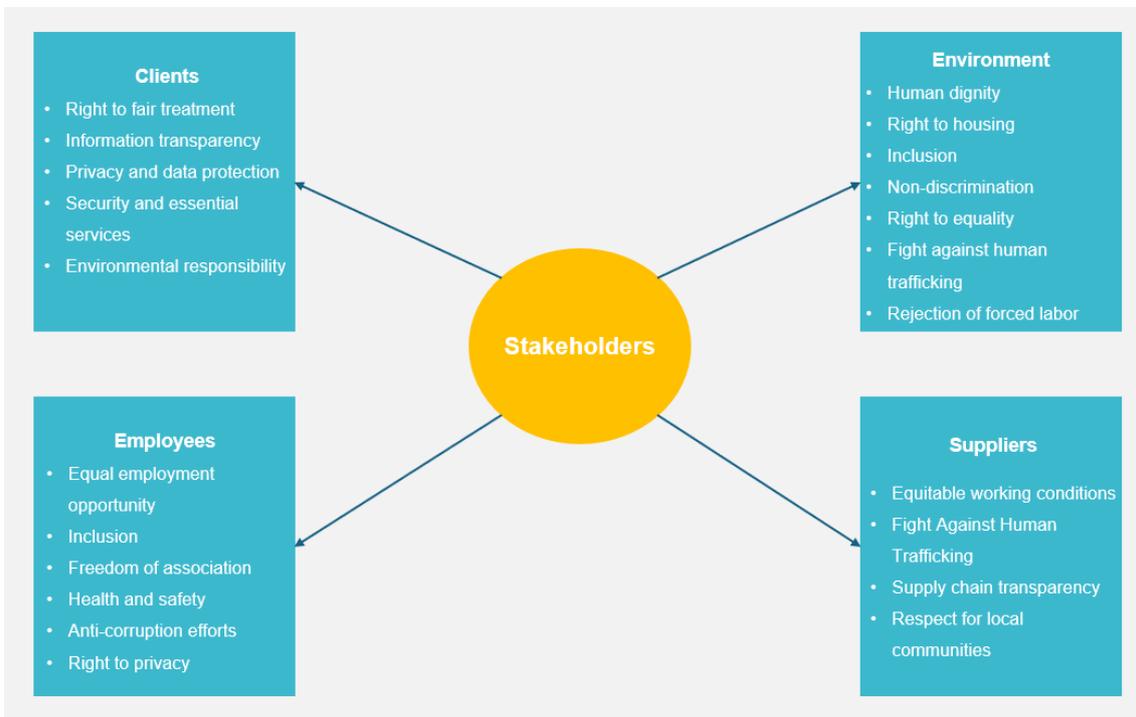
In this respect, Opdenenergy undertakes to carry out its activities based on the following principles:

- **Reject all forms of discrimination and promote equal opportunities** for employees, across all operations and throughout the supply chain, fostering an inclusive work environment that respects the dignity of individuals regardless of age, gender, marital status, nationality, religion, disability, race, ethnicity, or any other personal circumstance.
- **Reject child labor and all forms of forced or compulsory labor** across operations and throughout the supply chain, while ensuring decent working conditions.
- **Promote a culture of occupational health and safety**, encouraging responsibility among all internal and external members of the Organization for the prevention of occupational risks, thereby ensuring a safe work environment.
- **Implement due diligence** procedures to identify, prevent, mitigate, and account for potential negative impacts on human rights, including accessible grievance and remediation mechanisms for employees, communities, and other stakeholders.
- **Guarantee the right to a clean, healthy, and sustainable environment** by minimizing the environmental impact of operations and promoting responsible practices that support the health of local communities.
- **Respect the fundamental rights of individuals**, including—among others—the right to life, equality before the law, the right to privacy, and the protection of individual and collective property.

- **Uphold freedom of association and collective bargaining.** Employees have the right to join and participate in organizations that promote and defend their interests. The Organization also recognizes the right to worker representation.

### 3. COMMITMENTS AND PRINCIPLES FOR DIFFERENT STAKEHOLDERS

Through this Policy, the Organization commits to a set of principles designed to promote and respect human rights within its sphere of activity, taking into account its relationship with various stakeholders: employees, clients, suppliers, and the surrounding environment.



#### Clients

Clients are expected to respect the rights established herein, adopting a conscious and collaborative approach that fosters fair, transparent, and sustainable relationships with the Organization, communities, and the environment.

#### Employees

Employees are expected to maintain a proactive commitment to an ethical, diverse, and safe work environment, where mutual respect, collaboration, and integrity are at the core of all actions and professional relationships.



## HUMAN RIGHTS POLICY POLICY

### **Suppliers**

Suppliers must operate with integrity, ensuring responsible practices, transparency throughout the supply chain, and respectful treatment of workers and local communities.

### **Environment**

Communities are encouraged to foster environments where human dignity and equality are core values, promoting inclusion and firmly rejecting all forms of exploitation or forced labor.

## **4. INTEGRATION**

The Organization integrates its commitment to supporting and respecting human rights into its strategy, processes, and operational model. All entities within the Organization are expected to assume responsibility for ensuring compliance within their respective spheres of influence, with the goal of achieving the human rights objectives established.

This commitment is particularly reflected in corporate financing decisions, human resources management, and in supplier selection and contracting processes.

## **5. MONITORING AND COMMUNICATION**

At Opdenenergy, we view our commitment to human rights as an opportunity for continuous improvement and evolution in how we manage the Organization. We are therefore committed to allocating the necessary resources to advance in this endeavor.

Regarding the monitoring and communication of these objectives and related actions, both internally and externally, the Organization will ensure that stakeholders are appropriately informed and aligned with the commitments set out in this Policy.

**I. ANNEXES AND RELATED POLICIES**

• P-OPD-RC-IN-0002 Criminal Risk Prevention Procedure for Legal Entities
• P-OPD-RC-IN-0002-R01 Catalogue of Criminal Offences
• Declaration of equality
• C-OPD-RC-EX-0002 Code of Ethics
• C-OPD-RC-EX-0003 Anti-Corruption Policy
• C-OPD-SB-EX-0001 Sustainability Policy
• C-OPD-CA-EX-0001 Política de Medio Ambiente, Calidad y Seguridad y Salud
• C-OPD-RC-EX-0004 Política del Sistema Interno de Información
• C-OPD-RH-EX-0003 Política de Prevención del Acoso Laboral
• I-OPD-RC-EX-0001 Regalos y Hospitalidad Empresarial
• M-OPD-RC-IN-0001-A01_Política de Gestión de Riesgos