



## **ITÍNERE Group Human Rights Due Diligence Policy**

### **ITÍNERE Group commitment to respect human rights**

We consider that our business and that of the individuals and legal entities associated to it (including the subsidiaries forming the "ITÍNERE Group" or the "Group") must be performed with maximum respect towards human rights, which must be observed and respected throughout all operations carried out by employees and companies, without distinction, within the ITÍNERE Group.

The ITÍNERE Group promotes its own respect towards human rights in all its business relationships, and the adherence of its contractors, suppliers and business partners to the same principles, paying special attention to high-risk and conflict situations.

### **International benchmarks**

This Policy is informed by the following treaties under international and European law:

1. The International Charter of Human Rights of the United Nations (UN).
  - a) The Universal Declaration of Human Rights.
  - b) The International Covenant on Civil & Political Rights.
  - c) The International Covenant on Economic, Social & Cultural Rights.
2. The fundamental conventions of the International Labour Organisation (ILO) numbers 29, 87, 98, 100, 105, 111, 138 and 182, and the ILO Declaration on fundamental principles and rights at work.
3. The fundamental conventions of the International Labor Organization (ILO) numbers 29, 87, 98, 100, 105, 111, 138 and 182, as well as the ILO Declaration on fundamental principles and rights at work.
4. The European Convention on Human Rights.

The most recent versions of the following business standards and voluntary initiatives have also been considered:

1. The principles of the United Nations Global Compact.
2. The Guidelines of the Organization for Economic Cooperation and Development (OECD) for Multinational Enterprises.
3. The ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.
4. The United Nations Guiding Principles on Business and Human Rights: Implementation of the United Nations framework to "protect, respect and remedy".

The term "business relationships" encompasses "relationships with business partners, value chain entities, and any other non-state or state entity directly related to the company's business operations, products, or services" (see Principle 13 of the Principles UN Guides on Business and Human Rights: Implementing the United Nations Framework to "Protect, Respect and Remedy").



## **Domestic and internal benchmarks**

The following documents are our benchmarks for Spain:

1. Due Diligence on Human Rights in companies.
2. National Business and Human Rights Action Plan.

The following internal documents supplement and are linked to the principles consigned to this Policy:

1. The ITÍNERE Group Code of Conduct.
2. The Operating Regulations of the Compliance Unit.
3. The Criminal Liability Risk Prevention Model.
4. The Labour Risks Prevention Model.
5. The Whistleblower Channel Protocol.

## **Principles**

### **Rejection of forced or compulsory labour and child labour**

The ITÍNERE Group rejects the use of any form of forced or compulsory labour –as defined in ILO Convention 29– and does not confiscate money or identity documents at the beginning of the employment relationship in order to retain workers against their will.

Forced or compulsory labor is understood as: any work or service required of an individual under the threat of any penalty and for which said individual does not volunteer (see article 2.1 of ILO Convention 29).

The ITÍNERE Group respects the rights of children and rejects the use of child labour according to the definition of this concept included in the current legislation in the country in which the corresponding activities are carried out and respecting, in all cases, the minimum age established in ILO Convention 138.

### **Respect for diversity and non-discrimination**

The ITÍNERE Groupo rejects all forms of discrimination and maintains its commitment to ensure that all its workers are treated with respect and offered equal opportunities, on establishing the employment relationship and at any stage of its development.

The term "discrimination" includes all kinds of direct or indirect discrimination, especially:

- a) any distinction, exclusion or preference based on race, colour, sex, religion, political opinion, national roots or social origin that may nullify or alter equality of opportunity or treatment in employment and occupation;
- b) any distinction, exclusion or preference that may nullify or alter equality of opportunity or treatment in employment or occupation. (See article 1.1 of ILO Convention 111.)



### **Freedom of association and collective bargaining**

The ITÍNERE Group recognises the right of its employees to form or participate in organisations whose purpose is to defend and promote their interests, and does not interfere with their choices in this regard. It also recognises workers' right to representation within their different work units, by trade unions and other forms of representation chosen in accordance with labour legislation.

The ITÍNERE Group recognises the value of collective bargaining as a preferred instrument for determining the contractual conditions of its employees, as well as for regulating relations between the management and the trade unions.

### **Health & Safety at work**

The ITÍNERE Group is committed to ensuring that optimum health & safety conditions are respected in workplaces.

The ITÍNERE Group promotes the dissemination and reinforcement of a safety culture, developing awareness of risk and fostering responsible behaviour among its workers, through information and training sessions and other activities.

The ITÍNERE Group works to protect the health and safety of its employees and the interests of other stakeholders, principally by application of preventive measures.

### **Fair and favourable working conditions**

In order to maintain a positive and respectful work environment, the ITÍNERE Group rejects all forms of harassment --be it verbal, physical, sexual or psychological--, threat or intimidation in the workplace. Our remuneration policy takes into account the principle of fair remuneration for work and respects the principle of equal remuneration between male and female employees for work of equal value, based on objective job assessment, taking as baseline the work entailed (ILO Convention 100).

The minimum remuneration received by ITÍNERE Group employees may not be less than the minimum stated in the collective agreements and in the prevailing labour regulations, pursuant to the provisions of the ILO International Agreements.

The ITÍNERE Group also recognises the importance of training and professional guidance for the development of human resources and their capacities, promoting different forms of involvement and participation for employees and their representatives.

That is why Grupo ITÍNERE considers that its relationship with its employees is one of its key responsibilities in the field of human rights. Our policy for recruitment, management, promotion and development is based on respect for diversity, equal opportunities, meritocracy and no discrimination by reason of gender, race, age, disability or any other circumstance.



## **Communities and society**

### **Respecting the rights of communities**

The ITÍNERE Group undertakes to respect the rights of local communities and contribute to enforcing such rights, even by promotion of free and informed consultation activities.

In the design, construction, conservation and/or exploitation of infrastructures, the ITÍNERE Group undertakes to pay significant attention, using appropriate environmental and social impact studies, to its environmental footprint and respect for human rights in the areas in which it operates such projects. When the execution of a project may lead to relocation of local communities, the objective will be to minimize the impact, through close interaction with community members and fair compensation.

**Integrity:** Zero tolerance for corruption. The ITÍNERE Group deems corruption to be one of the factors undermining institutions and democracy, ethical values and justice, and thus the well-being and development of society. Consequently, it rejects corruption in all its forms, whether direct or indirect.

### **Privacy and communications**

The ITÍNERE Group respects the confidentiality and the right to privacy of everyone with whom it interacts, pursuant to its code of conduct, and undertakes to correctly use all the information and data in its possession. The ITÍNERE Group also undertakes to ensure that all its institutional and commercial communications are non-discriminatory and respectful towards diversity, and pays special attention to avoid negatively impacting the most vulnerable members of society, such as children.

### **Enforcement and monitoring**

Consistent with the content of the "United Nations Guiding Principles on Business and Human Rights: Implementing the United Nations Framework to 'Protect, Respect and Remedy'", this document represents a public commitment to rights humans that the ITÍNERE Group has pledged to its stakeholders. In order to apply the commitments contained in this document, the ITÍNERE Group will establish appropriate due diligence procedures to guarantee its implementation and monitoring through the action plans stemming from the ITÍNERE Group's Regulatory Compliance Programme.

### **Breaches. Communication.**

Any person related to the ITÍNERE Group who considers their situation to run contrary to what is stated herein, can report it to the Compliance Area.

Communications can be submitted over the following channels:



- Online: Over the Compliance Channel available to employees and suppliers by clicking on the corporate webpage. <https://www.grupoitinerere.com/whistleblower-channel/>
- By mail to the following address:

Compliance Unit  
ITÍNERE, S.A.  
EDIFICIO EUROCENTRO  
Calle Poeta Joan Maragall, nº 1- 11th floor

In processing these communications, the Compliance Area, managing the Compliance Channel of the ITÍNERE Group, will act to protect whistleblowers from any form of retaliation, understanding as such any act that may give rise to the mere suspicion that the person may be subject to any form of discrimination or penalty. Moreover, the confidentiality of whistleblowers' identity is guaranteed, unless the applicable legislation establishes otherwise. In any case where a communication of this type leads to the revelation of a breach of this Policy's principles, the procedure established in the Code of Ethics and in the Whistleblower Channel Policy will be applied.

The Compliance Area, after making the necessary enquiries and verifications, will report to the ITÍNERE Group's Compliance Unit, with a proposed resolution.

#### **Competencies of the ITÍNERE Group Compliance Area**

For the purposes of this protocol of a corporate nature, the Compliance Area, through the ITÍNERE Group Compliance Unit, has the following duties:

- Planning and coordination of the implementation of the due diligence process, in collaboration with the other areas involved, within the scope of their responsibility.
- According to the Guiding Principles on Business and Human Rights (principles 17-21), the adoption of human rights due diligence refers to a continuous management system that the company adopts according to the sector in which it operates, the context of its operations, the size of the company and other factors, in order to ensure that human rights are respected and to avoid contributing to the infringement of those rights. This process involves "identifying, preventing, mitigating and being accountable" for the potential negative effects generated by the company.

#### **Review**

This Policy will be periodically reviewed to guarantee its adequacy and effective implementation.

#### **Communication and training**

The Human Rights Policy will be distributed to all those interacting with the ITÍNERE Group, whether internally or externally, through specific communication initiatives, chosen from among a range of possibilities, posted to the corporate website.



Training will be given to ensure that all ITÍNERE Group employees adequately understand the content of this Policy.

### **Business relationships**

Respect for Human Rights will preside over relations with business partners and other entities in the value chain, as well as with any other non-State or State-run entity directly related to the company's commercial operations, products or services. (Principle 13 of the "Guiding Principles on Business and Human Rights: Implementation of the United Nations Framework to 'Protect, Respect and Remedy'").

### **Discrimination**

For the purposes of the ITÍNERE Group, the term "discrimination" includes all types of direct or indirect discrimination that may imply any distinction, exclusion or preference based on race, colour, sex, religion, political opinion, national descent or social origin that nullifies or alters equality of opportunity or treatment in employment and occupation;

### **Due diligence**

According to the Guiding Principles on Business and Human Rights (Principles 17-21), the term "human rights due diligence" refers to a continuous management system that the company adopts depending on the sector in which it operates, the context of its operations, the size of the company and other factors, in order to ensure that human rights are respected and to avoid contributing to the infringement of said rights. This process involves "identifying, preventing, mitigating and being accountable" for the potential negative impacts generated by the company.