



Human Rights Policy

December 20, 2024

The United Nations Guiding Principles on Business and Human Rights, the ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, as well as all applicable national laws and regulations in this area, serve as fundamental guides and references for **the Azkoyen Group** (hereinafter “Azkoyen”). These establish how all individuals within the organization, as well as all external relations, should be treated.

Azkoyen promotes the prevention of human rights violations and establishes measures to avoid abuses in this area, complying with applicable legal regulations in all countries where it operates.

The **Board of Directors** of Azkoyen, aware of the importance of respecting, protecting, and fulfilling internationally recognized human rights, and exercising its authority to approve and update corporate policies, approves this Human Rights Policy, whose purpose is to establish the basic principles of action, and assumes the following commitments:

Respect for human rights: *Respect and promote internationally recognized human rights in all activities and business relationships, in accordance with international principles and standards, including the United Nations Guiding Principles on Business and Human Rights.*

Non-discrimination and fair treatment: *Do not discriminate against anyone based on race, color, gender, religion, national origin, sexual orientation, disability, or any other status protected by national or international law.*

Right to decent work: *Respect the right of all workers to decent work, including fair working conditions, work-life balance, adequate remuneration, protection of health and occupational safety, and freedom of association and collective bargaining.*

Child labor and forced labor: *Do not use child labor or forced labor in any activities or at any stage of the supply chain, and take measures to investigate and eliminate any form of illegal or unethical work.*

Employment contracts: *Fully comply with all laws and regulations regarding employment contracts and working hours, including overtime and its compensation, as well as respecting and facilitating legally entitled leaves.*

Communication and transparency: *Provide clear and transparent information about policies and practices related to human rights, and listen and respond to concerns and complaints from all workers, customers, suppliers, and other stakeholders.*

Safe working conditions: *Azkoyen has established a strong occupational risk prevention culture, which is essential to ensure the safety and health of all workers. Azkoyen maintains zero tolerance and does not allow employees to be on premises under the influence of alcohol or drugs.*

Freedom of association and collective bargaining: *All Azkoyen employees are free to join or not join an association of their choice, as well as to create any association they wish, and to organize and negotiate collective or individual agreements in accordance with applicable laws. No employee should face harassment or retaliation for exercising these rights.*

To achieve these commitments, the Board of Directors of Azkoyen, through its **Board Sustainability Committee**, oversees the development and implementation of this Policy, the strategies, and the plans derived from it.

Likewise, the **Sustainability Committee** (comprising executives from various areas and representing all business segments of the Azkoyen Group), the General Management teams, and the Human Resources Department, in accordance with this Policy, promote and implement strategies, plans, programs, and initiatives, assign responsibilities at different organizational levels, involve all employees, and support the Committee in its actions.

To ensure communication, transparency, accountability, and the achievement of human rights objectives, Azkoyen has control bodies that continuously monitor, measure, and evaluate Azkoyen's performance and progress toward established goals, as outlined in the Sustainability Policy.

Additionally, as an identification and evaluation mechanism, Azkoyen annually updates the Risk Management model (risk map) with the assistance of an external advisor, identifying, categorizing, and prioritizing risks (including ESG, governance, and compliance risks) to establish mitigation actions for the most significant risks and an audit plan for those actions.

This Policy is also related to and complements the following internal Azkoyen regulations:

- Sustainability Policy
- Internal Reporting and Whistleblower Protection System Policy and Procedure
- Whistleblower Channel Privacy Policy
- Risk Management and Control Policy
- Compliance Manual
- Code of Conduct
- Equality, Diversity, and Inclusion Policy
- Health, Safety, and Well-being Policy
- Responsible Supply Chain Policy
- Corporate Work-Life Balance & Employee Well-being Policy

This Policy constitutes a corporate policy and applies to all companies within the Azkoyen Group.

This Policy was approved by the Board of Directors on December 20, 2024, and came into effect upon approval.