



HUMAN RIGHTS POLICY



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1 INTRODUCTION

Grupo IGNIS (or the “Company”) undertakes to carry out all aspects of its activity fulfilling the highest legal and ethical standards. To this end the Company has implemented this Human Rights Policy of Grupo IGNIS (hereinafter the “Policy”) which purpose is the promotion and respect of all human rights acknowledged in international treaties and applicable legislation.

This Policy is conceived on the grounds of the mission, vision and values of the Company and aligns with the rest of policies and internal Policies of Grupo IGNIS.

All employees, managers, directors of Grupo IGNIS or anyone acting in its name and in general, any member of Grupo IGNIS (hereinafter, the “Employees” or in singular the “Employee”) will adhere to the Policy and all other policies and internal policies previously approved by the Company for the sake of avoiding and detecting the commission of any unlawful act.

Grupo IGNIS shall make available for all Employees this Policy which shall be subject to the necessary actions for its communication, implementation, training and awareness.

This Policy and in general all actions of the Company with respect to human rights are based on the available international benchmarks mentioned below:

- The United Nations Charter on Human Rights (UN) formed by: the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights.
- The International Labour Organization (ILO) Declaration regarding the Fundamental Principles and Rights at Work and all other ancillary conventions.
- The Convention on the Rights of the Child and all other UN treaties on human rights.
- The UN Guiding Principles for Companies and Human Rights.
- The UN Global Compact.
- OECD Guidelines for Corporations.
- Labour Organization Tripartite Declaration of Principles on Corporations.



- Constitutions and national legislation applicable to the Company acknowledging or applying human rights to the corporate sector.

2 SCOPE OF APPLICATION

The Policy is addressed to Employees during the exercise their activities regardless of their type of contract defining their professional and/or employment relationship or of the place where they carry out such activity for them to act with the same purpose with respect to human rights and contribute to integrate such values in their operating strategy and global value chain.

Compliance with this Policy is mandatory for all Employees and its observance does not exempt from the fulfilment of all other standards to be applied pursuant to the current legislation of the areas where Grupo IGNIS operates.

Provisions of this Policy as well as of all other internal regulations of the Group are subject to the regulations governing each country. Should there be any discrepancy between this Policy and other Group policies and the regulations governing each area, the Company shall make its best endeavours to apply at least the basic principles of this Policy according to its sphere of influence. However, in the event of discrepancies the issue shall be referred to the *Compliance Officer* of Grupo IGNIS.

3 BASIC PRINCIPLES OF ACTION

The Company has defined in the commitments mentioned below, its priority areas of action following the guidelines of the Guiding Principles of the United Nations and having special consideration for the reality of specially vulnerable groups.



3.1 Commitments with employees

<i>Prohibition of forced labour and human trafficking</i>	<ul style="list-style-type: none">✓ No form of forced labour included bondage-regime labour, debt bondage, forced labour in prison, slavery or human trafficking will be tolerated.
<i>Prohibition of child labour</i>	<ul style="list-style-type: none">✓ No form of child labour pursuant to the provisions of Convention 138 of the International Labour Organization (ILO) and the principles of the UN Global Compact will be tolerated.
<i>Work conditions</i>	<ul style="list-style-type: none">✓ No form of humiliating or degrading treatment i.e., among others, physical punishment, sexual or racial harassment, verbal abuse or power abuse or any other form of harassment or intimidation will be permitted.✓ Ensure that working hours and remuneration of employees will satisfy their basic needs and the needs of their families with a remuneration consistent with the duties carried out as well as in compliance with legislation and ILO standards applicable to working hours, minimum salary and social security.✓ Provide legal contracts for all employees declining any practice far from this principle.✓ Meet the requirements established in national legislations with respect to security and health at workplace adopting the appropriate measures to guarantee the safety and health at work place.✓ Ensure the respect for the right to vacations, rest and conciliation of professional, personal and family life as well as the development of actions seeking the wellbeing of employees.✓ Carrying out training initiatives which allow the training and qualification of employees to safely develop their tasks, unfold and adapt to the different needs in the development of their tasks.
<i>Freedom of association and collective bargaining</i>	<ul style="list-style-type: none">✓ Guarantee trade union freedom, the right to association and collective rights of professionals without involving any sort of damage, retaliation or discrimination.✓ Protect in any circumstance, the right to strike and the right to collective bargaining, protecting the freedom of operation of employees' organizations pursuant to their Articles and standards without authorities' interference.
<i>Inclusion and</i>	<ul style="list-style-type: none">✓ Actively promote and respect an inclusive work



<i>Diversity</i>	environment boosting diversity in their different dimensions such as: abilities, cultural, gender, generational or sexual orientations.
<i>Equal treatment and opportunities</i>	<ul style="list-style-type: none">✓ Encourage equal treatment under a policy that completely rejects abusive or hostile conducts such as discrimination by race, sex, sexual orientation, beliefs, ideology, religion, social origin, disability, nationality, age, memberships or any other legitimate criteria according to current legislation; or labour harassment, either sexual or of any other kind.✓ Guarantee equal opportunities among employees guaranteeing the selection and promotion of employees based on objective criteria of merits and capacity and the same salary for work with the same value.

3.2 Commitments with clients

<i>Safe and respectful products and services</i>	<ul style="list-style-type: none">✓ Provide services and products that attending to their nature are safe and respectful with the environment.
<i>Exhaustive and transparent information</i>	<ul style="list-style-type: none">✓ Offer products and/or services adapted to the needs and circumstances of our clients or potential clients.✓ Provide accurate information on products and/or services supplied easing the understanding of the terms, conditions, benefits, risks and costs of products and/or services.
<i>No discrimination and respect for privacy</i>	<ul style="list-style-type: none">✓ Avoid any unjustified discrimination of the recipients of product offers and/or services respecting at all times the privacy of data and intimacy.
<i>Confidentiality</i>	<ul style="list-style-type: none">✓ Guarantee confidentiality, appropriate use and privacy of data of Grupo IGNIS, its employees and third parties with which it interacts undertaking to use the necessary means to safeguard privacy. All of it without prejudice of legal, administrative or judicial provisions demanding their disclosure to entities or people or making them public.



3.3 Commitments with suppliers, contractors and other collaborators (joint ventures and partners)

<i>Respect of human rights throughout the supply chain</i>	<ul style="list-style-type: none">✓ Encourage the respect of human rights and labour rights acknowledged in OLI conventions as well as the OLI Declaration on fundamental principles and rights at work throughout the supply chain encouraging to extend the commitments stated in this policy to their relevant supply chains always respecting their management autonomy and applying the procedures and practices contained in the regulations of the Group on procurement.✓ Demand our suppliers and contractors the fulfilment of the specific requirements considered in the Suppliers' Code of Conduct of Grupo IGNIS.
<i>Communication and whistleblowing channels</i>	<ul style="list-style-type: none">✓ Encourage the creation of communication channels with suppliers and contracts to allow the notification of potential adverse impacts on human rights.



3.4 Commitments with local communities and society

<i>General principles</i>	<ul style="list-style-type: none">✓ Encourage positive impacts of our activity and promote the shared value in order to encourage sustainable development of the communities where we operate.✓ Implement the necessary measures to avoid negative impact on personal and professional traditions and customs of those living in the areas of operation.✓ Promote proactive and transparent dialogue in all stages of our projects.✓ Ensure fulfilment of local laws and respect of rights, culture, customs and values of people of local communities potentially affected by the development of the activities with special consideration of vulnerable groups.
<i>Indigenous Communities</i>	<ul style="list-style-type: none">✓ Respect the rights of indigenous population, tribes and locals pursuant to the current legislation and with Conventions 107 and 169 of the ILO.
<i>Safety and respect for the environment</i>	<ul style="list-style-type: none">✓ Reduce the environmental impact of our transactions applying:<ul style="list-style-type: none">• A preventive approach avoiding when possible, the location of projects in ecosystems of high ecological value and in its areas of connectivity.• The principle of mitigation hierarchy (avoid, minimize, restore and ultimately, offset) and if the event of offsets, the principle of no net loss.✓ Establish the safety measures necessary to prevent our premises from involving a risk for the physical safety of third parties.✓ Manage in environmentally safe manner all hazardous substances, wastes, residues and emissions generated during activity applying the appropriate prevention measures to avoid environmental accidents.
<i>Displacement and/or evictions</i>	<ul style="list-style-type: none">✓ Attending the provisions of the Basic principles and Regulations of United Nations on Displacement and Evictions consequence of the Development of 2007.✓ Consulting local communities on activities, projects, strategies or works affecting their territories and life through a Free, Prior and Informed Consent process (CLPI for its



	Spanish initials) using the appropriate cultural procedures.
<i>Fight against corruption</i>	<ul style="list-style-type: none">✓ Act honestly and integrally.✓ Fight against corruption in its different forms by the creation of a control environment (internal policies, procedures and training of our employees).
<i>Contribution to energy transition</i>	<ul style="list-style-type: none">✓ Boost the development of a more efficient and sustainable energetic model that contributes to a more agile and fairer energy transition.✓ Encourage innovation of the energy sector to promote fundamental rights of people and society in general.
<i>Dialogue and listening</i>	<ul style="list-style-type: none">✓ Establish claim mechanisms from the beginning so that people potentially affected may inform Grupo IGNIS of any situation of potential impact on human rights aspects.✓ Encourage transparent, ethical and collaborative dialogue with groups of interest in order to know their expectations, establish alliances and create effective and valuable contributions.



4 COMPLIANCE OF THE POLICY

Employees and Suppliers in the development of their duties shall not only make their best endeavours to act according to the law but also to do so according the social corporate responsibility of Grupo IGNIS in order to guarantee that the principles and standards included in this Policy govern the global operation in all the value chain of the Company.

The Company shall implement all resources necessary for everyone to whom this Policy applies, to act always honourably assuming the following responsibilities:

- Reading, knowing and understanding this Policy as well as the rest of policies, principles and procedures of Grupo IGNIS aimed at guaranteeing adherence to all its requirements.
- Meeting each and all of the aspects included in the Policy, policies, principles and procedures of Grupo IGNIS.
- Ensuring that all Suppliers and collaborators affected by this Policy and other policies, principles and procedures of Grupo IGNIS undertake and fulfil it
- Demonstrating in day to day activities the commitment with the principles of the Policy and other policies and procedures of Grupo IGNIS as well as setting an example for the rest of collaborators.
- Avoiding any situation which may give rise to illegal practices or inconsistent with the basic principles of action contained in this Policy.
- Collaborating with compliance and audit bodies providing the information requested and being faithful to reality.
- Checking with the *Compliance Officer* in case of doubts with respect to the actions to be taken pursuant to the provisions of this Policy and other policies, principles and procedures of Grupo IGNIS.
- Communicating any incidence arising from the knowledge or suspicion of breach of this Policy and other policies, principles and procedures of Grupo IGNIS.

The breach of the provisions in the Policy may be the object of legal actions. In the event of breach of the provisions of the Policy, the Company and its Employees shall react immediately subject to the framework allowed by the regulation to be applied, implementing all legitimate measures applicable.



The response will be consistent with the seriousness of the facts regardless of the hierarchy of the people involved.

5 QUERIES AND COMPLAINTS

Grupo IGNIS makes available for all Employees as well as for third parties the Internal Information System (hereinafter the “Whistleblowing Channel”) for any party interested in reporting incidents, queries, doubts or complaints regarding the breach of the commitments of this Policy as well as all other internal and external regulations applicable.

The Whistleblowing Channel is available on Grupo IGNIS corporate website for its use by all those Employees and third parties that require it.

Any Employee who is aware or has reasons to strongly suspect of a breach of this Policy or of conducts or acts contrary to the legal system shall contact through the Whistleblowing Channel with the Compliance Officer immediately.

The Whistleblowing Channel of Grupo IGNIS fulfils all demands and guarantees provided for Law 2/2023, of February 20, regulating the protection of persons who report regulatory violations and the fight against corruption, guaranteeing:

- Confidentiality of information.
- Lack of retaliation against the informant.
- Integrity of the traceability and management of complaints and/or queries made in good faith.

The Compliance Officer shall initiate an investigation in case of detection of signs of an irregularity provided for in the policies and/or in the applicable legislation and shall notify the beginning of such investigation to the informant and if applicable, the person denounced.



6 APPROVAL AND OPERATION OF THE POLICY

This Policy was approved by the Board of Directors of Grupo IGNIS on July 6th, 2023.

Since its approval the Policy is included in the regulations of Grupo IGNIS being in force until its annulment, revoke or update.

The Policy is subject to periodical revision and update processes in order to adjust it to the applicable regulations from time to time, to the social and professional reality and context of the Company.

In the event of any update of the Policy the interested parties will be timely informed using the communication mechanisms provided for by Grupo IGNIS.