



VERSION: 02

Human and Labour Rights Policy

Purpose

Aratubo management is responsible for approving this policy establishing the basic action principles in terms of fulfilling human and labour rights, based on the principles set out in the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Guiding Principles on Business and Human Rights, the United Nations Universal Declaration of Human Rights, the Ten Principles of the UN Global Compact, the Grupo Arania's Code of Conduct and Aratubo management policies.

Scope

The human and labour rights policy applies to Aratubo management and personnel everywhere the company operates.

Basic Action Principles

- > Respect human rights, applying a **due diligence process** on human rights to identify, prevent, mitigate and ensure accountability for how Aratubo addresses its impact on human rights.
- > Reject **corruption** in all forms including **extorsion** and **bribery**, with zero tolerance for malpractice.
- > Foster **decent employment**, rejecting all forms of so-called modern exploitation (child exploitation, forced labour, slavery and work in extreme situations), compensating people based on their training, experience, responsibilities and functions, pursuant to the applicable law and socioeconomic context.
- > Ensure employment is based on the principle of **equality and inclusion, preventing discriminatory conduct** based on sex, age, disability, sexual orientation, religion, politics, nationality, socioeconomic status, health or any other variable.
- > Guarantee the **right to a maximum number of hours per day and breaks** for personnel pursuant to the applicable law.
- > Manage **training and continuous learning** at Aratubo, improving the team's professional qualifications.
- > Ensure **occupational health and safety**, guaranteeing the workplace is safe and healthy pursuant to the law and the commitments set out in Aratubo's Occupational Health and Safety Policy.

- > Respect freedom of assembly and the right to collective bargaining, as well as the right to unionise and recognised protection of workers' representatives, pursuant to current law and ILO conventions.
- > Work in a culture of respect for human and labour rights by sharing the content of this policy with all stakeholders and carrying out actions to raise awareness and provide training.
- > Guarantee the right to privacy, protecting and properly using stakeholders' personal data.
- > Encourage respect for human rights throughout the value chain, insisting that the commitments set out in this policy be extended to suppliers and their staff.
- > Minimise Aratubo's environmental impact, recognising the right to a clean and healthy environment for the community.

Monitoring and Oversight Systems

The Sustainability Committee periodically oversees the level of fulfilment of the commitments made in the Human and Labour Rights Policy. It also reviews this policy regularly to ensure it remains appropriate and is focused on adding value.

A due diligence process and whistleblower hotline are available to identify and handle potential and actual human rights violations.

Disciplinary Scheme

Anyone who violates this policy may be subject to disciplinary measures and legal sanctions.

Disciplinary measures may also be applied to anyone who does not use due diligence to detect an infraction, fails to collaborate or hinders an investigation into potential violations.



Alberto Lejarreta

Chief Executive Officer of Grupo Arania

6 March 2023

