

# Human rights policy

## Objective

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This Policy is aligned with the provisions contained in Zelestra's General Sustainability Policy. The Policy sets out the Company's commitment to:

- The human rights and civil liberties recognized in the United Nations Universal Declaration of Human Rights.
- The Declaration on Fundamental Principles and Rights at Work of the International Labor Organization (ILO) and other related instruments.
- Principles of the United Nations Global Compact.
- The OECD Guidance on Responsible Business Conduct.
- The UN Guiding Principles on Business and Human Rights.

Furthermore, respect for human rights is present in the Sustainable Development Goals of the United Nations 2030 Agenda, goals to which Zelestra is publicly committed.

Zelestra supports, protects and cooperates with the protection of fundamental human rights recognized in national and international legislation, ensuring that it does not participate in any form of violation of these rights among employees, suppliers, contractors, collaborators, partners, competitors and society in general.

Therefore, the Company establishes principles and guidelines for action to identify, prevent, mitigate and repair current or potential impacts, reinforcing its commitment to human rights.

The commitments will be updated as the Company's activity evolves, and Zelestra is committed to continuously improving its human rights efforts in its areas of influence, as well as in all the countries where it operates.

## Commitments

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The Company undertakes to foster the adoption of the principles set out in the main international instruments on respect for human rights in the framework of its operations, in all the companies in which it participates, as well as to support, defend and promote their compliance and protection throughout the value chain.

- a) Global human rights management and due diligence procedures
  - Identification and assessment of relevant human rights issues: Assessing the company's human rights impact, areas of risk, their likelihood and identifying priority human rights issues.
  - Compliance with legislation: Applying the regulatory provisions in each market in which it operates
  - Due Diligence: Integrating evaluation findings across relevant internal functions and processes and following up on the effectiveness of the response.
  - Establishment of remediation measures: Cooperating promptly in remedying adverse human rights situations that the company has caused or to which it may have contributed
- b) Specific human rights
  - i. Commitment to its employees
    - Health and safety in the workplace: Providing a safe and healthy workplace, free from harassment, bullying and violence, and respecting the Company's requirements and obligations regarding employee health and safety.
    - Decent employment: Treating employees in a dignified manner, providing them with remuneration commensurate with their knowledge, experience, duties and tasks in accordance with applicable regulations and the corresponding socio-economic environment.
    - Freedom of information, expression and opinion: Recognizing the right to freedom of thought, conscience, religion and expression, and providing channels of communication to enable workers to express their views and ideas.

- Freedom of association and collective bargaining: Considering the right of employees to join, form or associate themselves with a trade union without fear of reprisal, intimidation or harassment.
  - Child and/or forced labor: Rejecting child labor and forced or compulsory labor as well as any other conduct affecting people's rights.
  - Equity and non-discrimination: Providing equitable opportunity and treatment in order to eliminate discrimination on the grounds of race, color, gender, sexual orientation, gender identity, religion, nationality, political opinion, disability, age or any other status of individuals not related to their ability to perform the job.
- ii. Commitment to suppliers, contractors and collaborators
- Adoption of human rights in its value chain: Promoting the adoption of human rights commitments and extending them to suppliers, business partners and third parties, monitoring compliance with established commitments, as well as promoting participation and collaboration.
- iii. Impact on local communities
- Respect for indigenous communities and their right to land: Providing the necessary means and resources so that the company's activities do not have a negative impact on indigenous populations, favoring an open dialogue that respects their rights, customs and traditions, as well as mechanisms for prevention and care of the land, its environment and ecosystem.
- iv. Respect and promotion of a clean, healthy and sustainable environment
- Care for the environment. Respecting and promoting a clean and healthy environment, respecting biodiversity and ecosystems and an environment free of pollution and waste
  - Recognizing the human right to a clean, healthy and sustainable environment: Respecting the right to a clean, healthy and sustainable environment free of pollution and waste.
  - Right to energy: Identifying and tackling fuel poverty within the communities in which it operates.

## Human rights prevention and mitigation

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In addition to the commitments acquired in the area of human rights for the current and potential risks identified, Zelestra has established a series of prevention and mitigation mechanisms to ensure their correct management.

- Channels of communication, complaints and claims: Establishment of complaint mechanisms and formalized procedures so that affected individuals may report such events.
- Access to remedies: Implementation of a complaints and grievance resolution process that expeditiously facilitates access to remedies.
- Training actions: Establishment of a training program on human rights for employees so that they form part of the system of prevention and mitigation of human rights violations and thus ensure compliance with the commitment made by Zelestra.
- Stakeholder engagement: Promotion of the participation of stakeholders in establishing appropriate measures for respecting human rights.

## Monitoring system

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The approval of the Human Rights Policy is the responsibility of Zelestra's Board of Directors, which, either directly or through a Committee appointed for such purpose, will supervise it, ensure its compliance and periodically review it for its continuous suitability.

The Company shall establish an internal monitoring system that allows the correct implementation of the Policy at all organizational levels, as well as the monitoring of the relevant associated indicators.

## Communication and stakeholder engagement

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This Policy is communicated and understood within the organisation and is available through the information and communication channels that the Company makes available to all its stakeholders.

The policy is publicly available on Zelestra's website.

In order to make it easier for anyone to report confidentially and/or anonymously any breach of the principles described in this Policy, Zelestra's Ethics Channel (<https://zelestra.integrityline.com/>) guarantees independence, impartiality and the absence of conflicts of interest throughout the process of receiving, processing and resolving complaints.

## Scope

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This Policy applies to all the companies of the Zelestra Group, to ZELESTRA CORPORACIÓN, S.A.U., and to those companies in which a majority of the shares, equity interests or voting rights are held, directly or indirectly, or in whose governing or administrative body it has appointed or has the power to appoint a majority of its members, such that it effectively controls the company. In those investees in which the companies of the Zelestra Group do not have effective control, Zelestra shall promote principles and guidelines consistent with those set forth in this Policy.