



**kovecta**

# Human rights policy

Corporate Policies 2025

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# Purpose

The objective of this Human Rights Policy (hereinafter, the “Policy”), which is part of the Human Resources Framework Policy, is to establish and disseminate the basic and general rules of Konecta, a multinational group of companies specializing in the provision of customer management services and digital solutions (hereinafter, “Konecta”, the “Enterprise”, the “Company”, or the “Corporation”), which serve as a framework for its business operations to be governed by processes and procedures aimed at guaranteeing respect for internationally recognized human rights, in any case and under any premise, in line with the values and principles that guide its activity.

This Policy responds to the expectations of its stakeholders (employees, clients, partners and shareholders, investors, financial entities, suppliers, public administration, and regulatory entities), referring to all company actions in this matter, within the framework of its activity, and will be available on the corporate website ([www.konecta.com](http://www.konecta.com)) to ensure it can be consulted by all interested parties.

Konecta ratifies this commitment as a signatory company of the UN Global Compact, which it joined in 2004, in line with the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work (“ILO Declaration”). Likewise, the company assumes the Sustainable Development Goals within the framework of the 2030 Agenda.



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# Scope of application

This Policy is of global application for all Konecta entities as part of its Compliance Program, and is supported by the company's general management.

Consequently, its content must be strictly observed for all Konecta workers, regardless of their position or function or geographical location.

Notwithstanding the foregoing, its scope of application may be extended, when necessary and possible due to the nature of the relationship, to all those natural and/or legal persons linked to Konecta by a business or professional relationship other than employment: suppliers, contractors, and workers in the supply chain, and business partners.

Given that many of Konecta's companies are domiciled outside the European Union, the internal regulation will be adapted to the specific regulations of each State, respecting and ensuring the basic principles collected here, aspiring to obtain continuous improvement to guarantee the well-being and professional development of the workers, as well as equal treatment and opportunities, gender equity, diversity, and inclusion of workers, directly or indirectly hired, and zero tolerance for discriminatory behaviors or practices or those that violate human rights.



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# General principles of action

Aware that each of the countries in which the Group operates has a different social context and needs, this Policy is articulated through plans and actions adapted to the reality of each of its local operations to achieve a safe and healthy work environment.

Konecta assumes the commitment to guide its actions based on the following principles:

### **Non-labor Human Rights**

- Respect for the rights of minorities and local communities in the areas where it operates, also respecting local laws, culture, and customs.
- Right to intimacy, data protection, and privacy of all people with whom it interacts, making appropriate use of personal data and information collected in all countries where it operates, with special care regarding the data of its employees and clients.
- Right to freedom of information and expression, within its scope of action, respecting the diversity of opinions and promoting communication with its stakeholders.
- Contribute to the fight against corruption, both directly and indirectly, in all its forms, including extortion and bribery, in accordance with Principle 10 of the United Nations Global Compact.
- Konecta has a global Compliance Program, which includes a criminal risk prevention model to avoid the commission of irregular or illicit conduct related to any type of corruption.
- Right to the environment, integrating criteria related to the natural environment, especially those related to the impacts of climate change in the development of its activities, and promoting environmentally responsible behaviors among its employees and suppliers.

### **Labor Human Rights**

- Rejection of the use of forced and child labor in the scope of any of its operations, or any other form of modern slavery, which includes human trafficking, bonded labor, or deceptive hiring of labor and services. It commits to comply with the labor legislation of the countries where it operates and, where appropriate, to take corrective measures.
- Commitment to diversity and rejection of any type of discrimination based on, among others, racial and ethnic origin, color, sex, sexual orientation, gender identity, disability, age, religion, political opinion, national ancestry, or social origin, or other forms of discrimination contemplated in European Union regulations and the local legislation of the countries where the company operates.
- Zero tolerance for situations of harassment, abuse, intimidation, discrimination, lack of respect and consideration, or any other type of physical or verbal aggression at work, fully rejecting any behavior contrary to these principles.
- Respect for the legally recognized rights of unionization, freedom of association, and collective bargaining, as well as the activities carried out by

workers' representative organizations, in accordance with the functions and competencies legally attributed to them.

- Protection of the health and safety of its workers, promoting their physical, mental, and social well-being, as well as the prevention of occupational risks, scrupulously complying with the legal requirements in this matter that are applicable according to the national legislation of the countries in which it operates.
- Fair, equitable, and favorable working conditions, offering its workers decent employment and remuneration in compliance with the labor regulations in force in all places where it operates, also guaranteeing the right to rest, and respecting that the working hours do not exceed the limit established by local legislation.

Konecta promotes a culture of respect for human rights and the awareness of its professionals in this matter. To this end, it will disseminate its commitment to these throughout its value chain—suppliers and contractors—encouraging them to subscribe to the company's principles of action in accordance with the precepts included in this Policy, the Code of Ethics, and the Code of Ethics for Suppliers, as well as procedures established in the purchasing area.

These principles of action respond to the impacts, risks, and opportunities (IROs) derived from the applicable material topics: generation of quality employment, occupational health and safety, diversity, equity, and inclusion, labor conditions and equal treatment and opportunities in the supply chain, adaptation and mitigation of climate change, information security, compliance and corporate ethics, and supplier management.

Both workers and any third party who suspect or are aware of any type of non-compliance or violation of human rights may transmit their information, doubts, or concerns, confidentially and without fear of reprisal, through the Information Channels available on the corporate website via the URL: <https://konecta.integrityline.com>, in accordance with the procedure PG COR 26 Information Channels, available in the same space, which specifies the different available channels and the nature of the communication that can be made through them.

This channel is available 24 hours a day, 7 days a week. No reprisal will be tolerated against anyone who, in good faith, communicates facts that could constitute a breach of this policy, and the guarantees and protections established by the applicable regulations and legislation will be applied to the communicators.

The pertinent disciplinary measures will be applied for non-compliance related to this policy in accordance with internal regulations and the legislation in force in each country, without prejudice to administrative or criminal sanctions that may also result therefrom, if applicable, and that may be imposed by the competent authority.

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# Update and review

This Human Rights Policy will be reviewed and updated periodically, or when necessary, to adjust it to the changes that the business model undergoes or that may occur in Koneccta's field of action or as a consequence of the approval of directly applicable regulations, ensuring its effectiveness and compliance.

NOTE: This Policy has been reviewed and approved on 16 December 2025 by the highest governing body and replaces any previous version thereof, with only this document being valid from the date.

## Version Control

Version	Review date	Reviewed	Validated	Approved	Reason for change
1	12/19/2022	Human Resources Organization & Procedure	Legal Affairs	Board of Directors	Initial edit
2	12/16/2025	Human Resources Organization & Procedure	Legal Affairs	Board of Directors	Alignment with legal requirements Alignment with the new format and branding