

HUMAN RIGHTS POLICY



Madrid, December 19, 2022

Konecta





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This Policy specifies and develops Konecta's commitment to human rights to ensure that they are scrupulously observed within the organization, in accordance with the highest international standards.

Our commitment is also expressed in the principles of action promoted in our Code of Ethics and the Code of Ethics for Suppliers, as well as in our Framework Policies on Human Resources, Selection and Recruitment, Equality, Diversity, and our Corporate Values: Innovation, Sustainable Development, Professionalism, Integrity, Excellence, Flexibility, and Commitment.

1.- PURPOSE

This Policy aims to describe the corporate demands necessary to ensure that our business operations are governed by processes and procedures designed to guarantee respect for human rights in any case, and under any premise.

Our employees are our greatest asset. Therefore, Konecta complies with all national laws, and promotes human rights in all its operations. No form of harassment, discrimination, or favoritism is tolerated, and there is a complaint mechanism to investigate any possible abuse.

Konecta strives to create the best possible working environment for its workforce, and has a Compliance Program in which guidelines for managing occupational health and safety risks play a leading role.

2.- SCOPE OF APPLICATION

This Policy applies to all Konecta entities, and is endorsed by the General Management. Each member of the Company is responsible for promoting the principles and commitments contained herein while performing their duties.

In addition, Konecta shall ensure that the suppliers and third parties with whom the Company maintains professional relations are aware of the principles regulated in this Policy.

3.- GENERAL PRINCIPLES OF ACTION

Konecta is committed to guiding its performance on the basis of the following principles:

Preventing discriminatory practices

Ensuring a working environment free from discrimination on the grounds of gender, race, ethnic origin, religion, age, disability, political or trade union membership, sexual orientation, nationality, marital status, or socioeconomic status. Harassment, abuse, intimidation, discrimination, disrespect, and lack of consideration, or any other physical or verbal aggression, are unacceptable, and shall neither be permitted nor tolerated at work, and any behavior contrary to these principles shall be fully rejected.

Rejecting Forced and Child Labor

Ensuring that no cases of forced labor or exploitation occur in any of its activities. In this sense, Konecta relies on a mechanism for the prevention and control of the minimum age for employment, in accordance with the standards of the International Labor Organization, or with the applicable legislation, where the latter is more restrictive. Furthermore, the Company undertakes to comply with the labor laws of the countries where it operates and, where appropriate, to take the necessary corrective actions.

Offering decent employment

Paying its staff, in compliance with the labor laws in force in all the locations where it operates. Konecta also undertakes to guarantee the right of its employees to rest.

Protecting human health

Offering Konecta professionals a safe and healthy working environment, promoting physical, mental, and social well-being within the company's preventive culture, and scrupulously complying with the relevant legal requirements regarding occupational health and prevention of occupational risks.

Facilitating collective negotiation and freedom of association

Observing the legally recognized rights to organize, and the rights of association collective bargaining, as well as the activities conducted by the workers' representatives, in accordance with their legally attributed functions and responsibilities, with whom they shall maintain a relationship based on mutual respect.

Promoting a culture of respect for human rights and creating awareness on this subject among employees

Konecta shall disseminate its commitment to human rights throughout its value chain, and undertakes to disseminate this policy to suppliers and contractors, promoting and encouraging them to underwrite it through its Purchasing Portal.

Protecting the privacy of personal data

Respecting the personal and family privacy of all people, including that of employees or of any other person whose data is available to the Company as a result of its operations, ensuring, in any case, scrupulous compliance with the legislation in force in this area.

Konecta's working staff undertakes to communicate any possible breach of the commitments contained in this policy as soon as they become aware. Any communication received shall be processed with absolute confidentiality, and the assurance of no reprisals towards the informant.

In particular, the Company has an Ethics Line aimed at receiving notifications about irregular behaviors or activities that allow the persons who are part of the Group to submit, in complete confidentiality, any queries on these and other matters.

4.- UPDATE AND REVIEW

This Human Rights Policy shall be reviewed and updated, where necessary, to adjust to the changes experienced by Konecta's business model, or to those which may be likely to occur in the company's field of action, or to those resulting from the adoption of rules of direct application, while ensuring its effectiveness and compliance.

NOTE: This Policy of Human Rights was revised and approved on 19 December 2022 by the Konectanet Group's governing body, S.L.U.