HUMAN RIGHTS POLICY

CONTENUR

2025

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01.

INTRODUCTION

This Human Rights Policy defines and reinforces the commitment of the CONTENUR Group (hereinafter also referred to as “the Group” or “CONTENUR”) to respect human rights (hereinafter “HR”). This commitment is based on the ethical principles and corporate culture that guide our activities and seeks to actively contribute to sustainable, fair and inclusive development.

This policy forms part of CONTENUR's commitment to ethical conduct, already established in the Code of Ethics and in other corporate policies that directly or indirectly safeguard the fundamental rights of individuals.

02.

SCOPE

This policy applies to all CONTENUR activities and is therefore mandatory for all personnel providing services to CONTENUR in any of the territories where the Group operates, regardless of their hierarchical position (hereinafter "personnel" or "professionals").

It also extends to all persons or entities that maintain a close or permanent collaborative relationship with CONTENUR and that adhere to or must respect the principles set out in this policy as a consequence of the nature or purpose of their activities.

03.

COMMITMENTS TO HUMAN RIGHTS FOR SUSTAINABLE ACTIVITY

The main purpose of this policy is to promote and ensure the CONTENUR Group's respect for the human rights recognised in applicable legislation and leading international reference treaties.

In this regard, at CONTENUR we adopt the following principles of conduct:

- **Prohibition of and opposition to any form of child labour and/or child slavery, forced labour and/or labour performed under coercion, slavery** (including practices associated with modern slavery), **servitude and human trafficking** in the Group's operations.
- **We promote diversity, inclusion and equal opportunities in order to contribute** to the well-being of our employees and their families **by fostering a safe, diverse and inclusive working environment**. We establish equal opportunities, diversity, respect for people and non-discrimination (on the grounds of race, sex, age, language, religion, disability, sexual orientation, opinion, origin, economic status, birth, trade union membership or any other personal or social circumstance) as fundamental pillars of the Group. We pay special attention to ensuring equality between men and women in access to employment, working conditions and remuneration.
- We reject all forms of harassment, threats or intimidation, whether verbal, physical, sexual or psychological, within the workplace.
- We are committed to providing **a safe and healthy working environment** through the adoption of occupational health and safety procedures and regulations. We periodically update our occupational risk prevention measures at all levels of activity, manage them in an integrated manner, and ensure that all personnel are aware of and comply with them in accordance with applicable regulations. In addition, we work with the objective of achieving zero accidents. These workplace wellbeing requirements should be understood not only from a physical perspective, but also in

terms of the mental health of our professionals.

- We guarantee freedom of association and trade union rights, the right to strike and collective bargaining as fundamental pillars of respect for labour rights. Likewise, we actively promote **freedom of expression** for all professionals within our Group, ensuring an environment in which they can express their opinions without fear of retaliation.
- We adopt the necessary measures to ensure the proper processing of employees' personal data, in compliance with current privacy and data protection legislation and with the objective of guaranteeing absolute respect for these fundamental rights.
- We actively promote measures that support the work-life balance of our professionals wherever possible, taking into account the nature of their activities. We apply fair practices that **guarantee the right to digital disconnection** and establish a strict framework in which working hours, rest periods and schedules comply with current labour legislation. Likewise, we encourage the implementation of initiatives aimed at promoting the physical and emotional well-being of all individuals who form part of our organisation.
- CONTENUR is committed to the talent and professional development of its employees. In this regard, we undertake to provide continuous training that facilitates the technical and personal development of our professionals, enabling them to perform their duties safely, grow professionally, adapt to the changing needs of the workplace and understand their rights and obligations regarding human rights in the professional environment
- We maintain a strong commitment to improving social rights in all the regions where we operate, contributing, to the extent of our capabilities, to the construction of a fairer and more equal society. We recognise the right of local communities to well-being and a healthy environment as a human right in itself, which must be fully respected within the framework of our activities.
- We promote respect for and the protection of human rights throughout our entire operational value chain. To this end, we are committed to implementing a supplier and partner qualification and monitoring system to ensure that they act with strict respect for the human rights recognised under applicable national and international legislation.

04.

REPORTING AND GRIEVANCE CHANNEL

We make our Ethics Channel (https://contenurgroup.integrityline.com) available to all employees and partners as a confidential and secure mechanism for reporting any well-founded suspicion or knowledge of breaches related to the commitments established in this policy.

For further information regarding its operation, please refer to the Group Ethics Channel Policy.

05.

IMPLEMENTATION AND MONITORING

To ensure the proper implementation and monitoring of the provisions established in this policy, the Management Committee shall establish a periodic monitoring and reporting procedure.

The Management Committee shall receive periodic information regarding the measures and procedures adopted by the Group companies to implement and verify the effective compliance with CONTENUR's commitments concerning Human Rights for sustainable business activities.

06.

COMMITMENT TO CONTINUOUS IMPROVEMENT



CONTENUR's Management is committed to the continuous improvement process of the implemented Human Rights Policy, establishing the necessary actions, appointing responsible parties and allocating the resources required for this purpose.

07.

ENTRY INTO FORCE AND UPDATES

This policy shall enter into force upon its approval by the Management Committee, which shall approve any adaptation or improvement made thereto.

08.

CHANGE CONTROL

REVISION	DATE	MODIFICATION HISTORY
0	16/05/25	Drafting and approval

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