



TECNICAS REUNIDAS

**Human Rights Policy of the Técnicas
Reunidas Group**

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HUMAN RIGHTS POLICY OF THE TÉCNICAS REUNIDAS GROUP

I. INTRODUCTION

The Board of Directors of Técnicas Reunidas, S.A. (hereinafter, "Técnicas Reunidas", "TR" or the "Company"), as a listed company, is empowered to determine and approve the general policies and strategies of the Company and the Group of which it is the parent entity (hereinafter, the "Group"), a power that has been included in article 27.i) of the Bylaws and in article 5.1.(x) of the Regulations of the Board of Directors of the Company.

TR aim to promote the creation of long-term value for all its stakeholders, such as employees, customers, subcontractors, suppliers, business partners, local and indigenous communities, public administrations, sectoral associations and other organizations with which it collaborates or shareholders, as well as society in general (hereinafter, "Stakeholders"), for which it is committed to respecting and promoting Human Rights.

The present Human Rights Policy of the Técnicas Reunidas Group (hereinafter referred to as the "Policy") has been prepared considering the provisions of (i) the United Nations International Charter (Universal Declaration of Human Rights, International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights); (ii) the Fundamental Conventions of the International Labor Organization (ILO) 29, 87, 98, 100, 105, 111, 138, 155, 182 and 187; (iii) the International Labor Organization Declaration on Fundamental Principles and Rights at Work; (iv) the United Nations Convention on the Rights of the Child; (v) the ILO Convention 169 on the Rights of Indigenous and Tribal Peoples; (vi) the European Convention on Human Rights; (vii) the principles of the United Nations Global Compact; (viii) the OECD Guidelines for Multinational Enterprises; (ix) the United Nations Guiding Principles on Business and Human Rights: Implementation of the United Nations Framework to "Protect, Respect and Remedy"; (x) the United Nations Declaration on Indigenous Peoples; (xi) the United Kingdom Modern Slavery Act of 2015; (xii) the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy; (xiii) United Nations Resolution A/76/L.75 recognizing the right to a clean, healthy and sustainable environment; (xiv) the International Covenant on Civil and Political Rights; (xv) the United Nations Convention on the Rights of Persons with Disabilities; (xvi) the United Nations Convention on the Elimination of All Forms of Discrimination against Women; (xvii) the United Nations International Convention on the Elimination of All Forms of Racial Discrimination; as well as other current treaties, conventions and standards relating to this matter, which the Society is aware of, assumes and applies. These minimum guarantees are without prejudice to the application of the regulations of the European Union or of the country where TR performs its activity when it is more stringent in the areas of environment, health and safety, and social sustainability.

Likewise, the Company must consider the local legislation of each country where it operates, always considering Human Rights and implementing risk prevention and mitigation actions in cases of conflict.

In accordance with the foregoing, the Board of Directors of the Company, as established in article 249.bis.b) of the Capital Companies Law and in accordance with the ESG principles (environmental, social and good governance), has agreed in its session of November 14th of 2023 to approve this Policy, following the proposal of the Audit and Control Committee approved in its session of October 25th of 2023, and with which one of the objectives contained in the Sustainability Plan 2021-2023, developed under the Sustainability Policy, is fulfilled. This Policy shall form part of the corporate governance regulations of the Company and its Group and shall be interpreted in coordination with the other regulations that make up said structure.

II. PURPOSE

The Group is a leader in energy transition and provides value-added engineering and industrial plant construction services for the sustainable production of clean fuels, natural gas, and chemicals for customers across the globe. In the framework of its activity, the Group promotes the creation of long-term value for all its Stakeholders thus promoting the values of sustainability, which forms a pillar of the Group, and in particular respect for Human Rights, and thus favoring the achievement of the Sustainable Development Goals ("SDGs") and incorporating the Ten Principles of the Global Compact.

In accordance with the foregoing, the aim of this Policy is to formalize the Group's commitment to the human rights in the exercise of its activities by the Company and its subsidiaries in its value chain, as well as with the Group's principles of action in this matter, and to define the principles that it will apply for due diligence in the field of Human Rights, complementing what is already established in other corporate documents such as the Sustainability Policy, the Code of Conduct and the Code of Ethics of the Supply Chain, as well as the internal regulations developing them.

III. SCOPE OF APPLICATION

In general, this Policy applies to the Company and to the other organizations of the Group, including all their managers, directors, and employees, as well as to affiliates not integrated into the Group over which the Company has effective control, all within the legally established limits.

In this sense, compliance with the commitments of this Policy is mandatory for all employees, managers and employees of the Group and its affiliates, promoting the joint action of the staff within the same Human Rights paradigm, thus allowing the integration of these principles in all their activity and value chain.

In those affiliates, where this Policy does not apply, the Company will promote, through its representatives in its governing bodies, the alignment and compatibility of its own policies with those of the Company.

In addition, this Policy will also be applicable, as far as appropriate and possible, to temporary unions of companies, *joint ventures* and other equivalent associations, whether national or foreign, that are used for implementing a specific project or business, when any of the companies that make up the Group have control of its management and always within the legally established limits, and to all members of the value chain of any Group entity.

IV. GENERAL PRINCIPLES OF ACTION

The Técnicas Reunidas Group commits to follow the general principles of action set out below in all the countries where it operates, considering the cultural, social, and economic diversity of each of them, in order to allow TR to identify and evaluate possible Human Rights risks in the Group:

- Act on Human Rights as per international standards of reference.
- Have a Due Diligence system that identifies the situations and activities performed by the Group with the highest risk of human rights violations, with the aim of developing risk prevention and mitigation mechanisms, including adequate complaint mechanisms and with guarantees for all those involved, as well the ones for remediation of impacts in case they occur.
- Periodically evaluate the effectiveness of the Due Diligence system through monitoring indicators, communicating the result of the evaluation of the effectiveness of the Due Diligence system in the statement of non-financial information.
- Foster a culture of respect for Human Rights and actions aimed at raising awareness in this area among professionals from all the Group's companies.
- Adopt the appropriate measures in case of detecting a violation of Human Rights in the Group's premises or those of its suppliers and inform the competent public authorities when such violation may infringe regulations. In the same way, the Company will adopt the necessary measures to prevent that a violation reoccurs.

IV.1 PRINCIPLES OF ACTION IN RELATION TO WORKERS AND THE VALUE CHAIN

Rejection of forced or compulsory labor and child labor

The use of any form of forced or compulsory labor and all forms of slavery and human trafficking and use of child labor, as defined in the current legislation in the country where the activities are performed and in ILO Convention 138, are rejected.

Prohibition of slavery

Any form of slavery is prohibited, considered as such, in accordance with ILO Convention 29 on Forced Labor, any situation in which one person deprives another person of his or her freedom to exploit him or her for personal or commercial purposes.

In particular, this prohibition of modern slavery shall include the following behaviors:

- Forced labor, considered as such any work or service demanded of an individual under the threat of any penalty and for which that individual does not offer himself /herself voluntarily.
- Bonded labor, considered as such that of people who contract a loan or debt and are forced to work multiple hours, in poor conditions and for a derisory salary to meet these payments.
- Child labor considered as such the employment of children in business activities.
- Human trafficking, considered as such recruiting, transporting, relocating, accommodating, or receiving a person, through any coercive means (such as threat, use of force, deception, or abuse) for the purpose of exploitation. Such exploitation shall include, at a minimum, the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs; When the victim is under the age of 18, for considering human trafficking coercive means do not necessarily need to be applied.
- Corporal punishment.
- Any other that is considered slavery in accordance with the applicable national or international regulations.

Respect for diversity and non-discrimination

It promotes the principles of diversity, inclusion, equal treatment, and opportunities and establishes a commitment to guarantee the right to labor conditions that respect the dignity of each person and to maintain a work environment where people are treated fairly and valued for their professional skills.

Likewise, any form of behavior that causes discrimination in relation to birth, gender, sexual orientation or identity, age, disability, nationality, racial or ethnic origin, religion, beliefs, political opinions, or any other form of individual diversity and, likewise, any form of harassment, threat or intimidation (whether verbal, physical, sexual or psychological) in the work environment is rejected.

In addition, the Company will adopt the necessary measures to prevent any kind of torture, cruel, inhuman, or degrading treatment.

Freedom of Association and Collective Bargaining

It recognizes the right of employees to participate in collective organizations to defend and promote their interests, as well as to be represented by trade unions or other forms of representation chosen according to current legislation and practices in different countries where they work.

Health, Safety and Well-being

A commitment is established to protect the health, safety, and mental and physical well-being of employees, implementing a strong culture of safety and well-being to promote a work environment with no risks for health that facilitates the balance of work and personal life.

Fair and Favorable Working Conditions

It recognizes the right of all persons to work in decent conditions that establish maximum working day, adequate rest periods and paid holidays per year.

Likewise, employees must receive fair and decent compensation for their work, which may not be lower than the minimum wage established by collective agreements and the regulations applicable in the different countries, applying equal remuneration between men and women for work of equal value, all in the terms provided by law.

It recognizes the importance of development plans and vocational training in the development of personnel and their skills, and the improvement of these skills will be promoted through specific training programs.

Right to privacy

The Group commits to protect the privacy, honor, data protection and privacy of its workers' communications, in compliance with the Group's current internal rules on electronic devices use and, similarly to those developed by the Company with its customers.

IV.2 PRINCIPLES OF ACTION IN RELATION TO ETHICAL BEHAVIOUR AND CORRUPTION

The Group promotes ethical behavior in all its activities and rejects corruption in all its forms, maintaining a policy of zero tolerance for corruption.

In compliance with this principle, the Group has a Code of Conduct and a crime prevention model with internal regulations for the development of internal anti-corruption regulations and system framed within the TR Criminal Compliance Management System

(<https://www.tecnicasreunidas.es/es/sostenibilidad/etica-y-complimiento/>).

This system seeks to promote a culture of ethics and respect for regulatory compliance, as well as to prevent, detect and, where applicable, punish conduct that may generate criminal liability, including corruption offenses in both the private and public sectors.

IV.3 PRINCIPLES FOR ACTION IN RELATION TO THE ENVIRONMENT

The Group has a strong commitment to the environment, being the leader of the fight against climate change, and recognizes the human right to a clean, healthy, and sustainable environment. For this purpose, the Group must respect the following principles, already included in its Sustainability Policy:

- Preserve and promote the biodiversity of ecosystems, landscapes, and species in the territories where Group operates.
- Promote the transition to the low carbon economy and prevent pollution by gradually reducing the intensity of greenhouse gas emissions, progressively applying the most efficient and least carbon intensive technologies both in its facilities and in the industrial plants it designs and builds for its customers.
- Ensure, through the implementation of the Company's environmental management system, the correct identification and compliance with all environmental requirements in each project.
- Consider the variable of climate change in internal decision-making processes, as well as when analyzing and managing long-term risks for the Group.
- Optimize the management of hazardous and non-hazardous waste through implemented systems that set objectives and goals on, among other aspects, waste reduction, the adherence to good practices and the use of recycled materials.
- Make commitment to the circular economy as a way to avoid the generation of waste and the reuse of materials.

IV.4 PRINCIPLES FOR ACTION IN RELATION TO SOCIETY, LOCAL COMMUNITIES, AND INDIGENOUS PEOPLES

The Group Técnicas Reunidas is aware of the social impact of its activities and projects. Therefore, it combines technical excellence in the implementation of sustainable plants for its clients, with consideration for the needs of its stakeholders, by means of conducting a continuous proactive and transparent dialog with them. This dialog reinforces its contribution to the sustainable environments where it operates, by generating a positive impact.

In this sense, the Group is committed to performing its projects in a sustainable way, contributing to the socio-economic development of the communities in which it operates, and fostering initiatives of cultural, social, and economic value, respecting local communities to promote inclusion and social development through education and training.

Similarly, the Group commits to pay special attention to indigenous and tribal communities and to respect the United Nations Declaration on the Rights of Indigenous Peoples. Therefore, in case that the execution of a project could affect indigenous and tribal communities, the Group commits to dialog with them and to involve them, to the possible extent and jointly with the rest of the stakeholders in the project, in its implementation.

V. RELATIONS WITH CONTRACTORS, SUPPLIERS AND OTHER BUSINESS PARTNERS

The Group will require that all its business partners comply with this Policy, considering as such, for the purposes of this Policy, any party, except the members of the organization, with whom the Company and its subsidiaries have or plan to establish any type of business relationship, including customers, *joint ventures*, *joint venture* partners, consortium partners, contractors, subcontractors, consultants, suppliers, advisors, agents, representatives and investors (hereinafter, the "Business Partners").

For this purpose, Técnicas Reunidas and the other Group companies shall:

- Prior to maintaining business relations with any Business Partner, make an integrity assessment analyzing whether it is aligned with the Group's values in the area of Human Rights, with the Principles of the United Nations Global Compact and with this Policy.

In particular, it should check the availability of commitments and the establishment of means and mechanisms to comply with this Policy and all the principles it contains.

- Establish the obligation for its Business Partners to be aware of and comply with this Policy, as well as the Code of Ethics of the Supply Chain of the Company, ensuring that all contracts of the companies that make up the Group with these Business Partners contain clauses on Human Rights that include the aspects mentioned in the principles included in this Policy. In this sense, the Company will ensure that contractual guarantees are obtained to comply with this Policy, supplemented, where appropriate, by the appropriate measures to verify its compliance, and it may even perform an independent check when necessary.
- Respect the Human Rights of its Business Partners, rejecting any type of discrimination, as well as respecting at all times the right to privacy, protecting and making correct use of the personal data entrusted by them.
- Apply the system of Due Diligence and third-party integrity assessment procedure valid at a given moment.

VI. COMPLIANCE WITH THIS POLICY AND COMPLAINT MECHANISM

Any person who has detected or suspected that a situation of potential violation of Human Rights or the Principles established in this Policy is occurring in any form and in any part of the business, shall inform on it as soon as possible through any of the following communication channels of the Group:

- Web page mailbox:
<https://canaletico.tecnicasreunidas.es/tecnicasreunidas>
- Email: compliance@tecnicasreunidas.es

The applicable procedure in this area is a document described in the Whistleblowing Channel Use Guide and Investigation Procedure, which may be accessed on the TR website.

The Company will not tolerate any retaliation against anyone who, in good faith, reports on facts that could be considered a breach of this Policy and will at all times maintain the highest standards of confidentiality in these notifications.

Failure to comply with the provisions in this Policy may give rise to the corresponding disciplinary sanctions in accordance with the collective bargaining agreement, labor legislation and other civil and commercial obligations that the employee has accrued.

In case of Business Partners, failure to comply with these provisions could give rise to the relevant civil and commercial liabilities and may seriously infringe contractual obligations that gives rise to the termination of the contract with the Business Partner.

Likewise, the Company will adopt the necessary measures to prevent that the violation or breach of this Policy reoccur.

Likewise, the most serious breaches can lead to criminal consequences.

If the procedure has concluded that Human Rights have been directly or indirectly violated, the Company commits to initiate actions to remedy said violation that ensure that those affected by this breach get an effective remedy, by restoring those affected persons or groups in which they would have been if this violation had not occurred. If it had not been possible, to assess the most appropriate alternative mechanism of remedy depending on the circumstances. Likewise, the Company will adopt the necessary measures to prevent that a violation reoccurs.

VII. TRAINING AND EDUCATION

The Company shall perform the necessary dissemination, awareness-raising and training actions that ensure the appropriate knowledge of this Policy and, in general, of Human Rights, by the employees of the Group and by the Business Partners with whom it relates.

It will be published in intranet and on the Company's website.

VIII. POLICY MONITORING

The Board of Directors of the Company, through the Audit and Control Committee, will receive periodic information on the measures and procedures adopted in the Group to implement and follow up on the provisions of this Policy.

Likewise, the Audit and Control Committee is responsible for periodically supervising the implementation of this Policy, as well as reviewing it, and for submitting any amendments it deems appropriate to the Board of Directors.
