

2023

Human Rights Policy



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1. Introduction

A unique way of working

1.1 Justification

Ecoener has always had a **long-term view** and is committed to **value creation** that ensures balance and respect for the natural environment and **the development of communities** where it operates its projects.

Through the Human Rights Policy, Ecoener expresses its **commitment, support, respect and contribution to the protection of** internationally recognised fundamental human rights, incorporating them as guiding principles for its policies and the development of its activities.

1.2 Goal

With this policy, Ecoener formalises its commitment to human rights, as recognised by national and international legislation. This framework of action **establishes the principles and basic guidelines that define its conduct with regard to** compliance with human and labour rights **in all places where it is present**.

Ecoener is committed to respecting human rights. In the event of any negative impact, Ecoener will act to remedy it. It undertakes to **encourage the adoption of these principles and values** and **not be complicit in any form of abuse or violation** of human rights among its employees, suppliers, partners and investors and in the communities that are affected by the development of its activity.

2. Scope of application

Ecoener is committed to the respect, compliance and protection of internationally recognised human rights in **all its activities, labour and commercial relations and in the different geographical areas** where it is present, paying particular attention to human rights where there is a greater risk of violation in the development of its activities.

The policy sets out commitments in three areas of action:

1. **Basic principles of conduct.**
2. **Employees – work practices.**
3. **Communities.**
4. **Environment.**

Ecoener promotes respect for human rights and will seek adherence to these principles by its contractors, suppliers and commercial partners, paying special attention to situations of conflict and high risk.

3. Regulatory framework

Ecoener is a company that recognises and respects human rights. This commitment to action is in line with the provisions of the **United Nations (UN) Universal Declaration of Human Rights** and its main instruments, as well as the **principles established by the International Labour Organisation (ILO)** on the Fundamental Principles and Rights at Work.

In this regard, with this policy, Ecoener not only **commits itself to respecting internationally recognised human rights**, but also adopts the established requirements in different international standards, which establish the importance of performing actions aimed at protecting and ensuring respect for human dignity and rights. Ecoener shares and promotes, in each of its actions, respect for all the rights expressed in the **European Convention on Human Rights**, the ILO Conventions 107 and 169 on the rights of indigenous and tribal peoples and the United Nations Convention on **Children's Rights**.

In line with the above, for the implementation of its projects and the development of its activity, Ecoener will proceed in accordance with the principles and good practices set out in various **international reference standards**, and which have been validated by the relevant authorities. Ecoener is also committed to taking into account the provisions of voluntary initiatives, notwithstanding their non-binding nature, including, but not limited to:

- The 2030 Agenda of the **Sustainable Development Goals (SDGs)**.
- The **10 Principles of the United Nations Global Compact**.
- The guidelines of the **Organisation for Economic Co-operation and Development (OECD)** for Multinational Companies.
- The United Nations **Guiding Principles on Business and Human Rights**.
- The Corporate Responsibility to Respect Human Rights: An interpretive 2012 guide by the United Nations.
- The Tripartite Declaration of **Principles on Multinational Companies** and the Social Policy of the ILO.
- The **Equator Principles**.
- The United Nations Basic Principles and Guidelines on **Evictions and Displacements Induced by Development**.
- The Voluntary Principles on **Security and Human Rights**.
- United Nations Basic Principles on the **Use of Force** and Firearms by Law Enforcement Officials.
- The International Covenant on **Civil and Political Rights**.
- The International Covenant on **Economic, Social and Cultural Rights**.
- The Guidelines of the Global Reporting Initiative (GRI).
- Other relevant standards.

This Policy complements the provisions of the **Code of Conduct**, the **Sustainability Policy** and Econer's **Community Relations Policy**, and in any case, must be seen as an integral system that reflects the company's commitment to human rights and sustainability. In those countries where the national legislation or regulations may conflict with the respect of human rights, Ecoener will establish the measures and actions to control and mitigate the risks as defined in this regulatory framework.

4. Our commitments

4.1 Basic principles of conduct

Protecting, respecting and mitigating:

Ecoener is committed to protecting, respecting and ensuring compliance with human rights, in all its actions and in the development of its activities.

To achieve this goal, Ecoener has established the following basic principles of conduct that must be taken into account in each of the projects and geographical areas in which it carries out its activities:

4.1.1 Due Diligence

Ecoener is committed to **proceeding with due diligence** with respect to human rights in all its activities; for this purpose, when carrying out its activities, its commitment is to:

- To continuously consider the potential impacts on human rights in the development of its projects from beginning to end; that is, during the stages of design, development, construction and operation.
- **To take appropriate and necessary measures to prevent or mitigate negative impacts** on human rights directly related to the development of its activities, and to remedy such impacts in the event that they should occur.
- To correct bad practices that may be identified with regard to compliance with human rights, and when appropriate, to report the situation to the relevant authorities.
- To periodically evaluate the effectiveness of the due diligence system.
- To communicate the measures and actions taken to prevent or mitigate the consequences of its activities on human rights.
- To publicly report any situation identified as a serious violation of human rights.

4.1.2 Complaints

As part of its commitment to human rights, Ecoener undertakes to have complaint and claims mechanisms in place to deal with possible cases of violation of human rights, making it easier for anyone, external or internal to the organisation, to bring to the company's attention any situation that may affect compliance with this policy.

For this purpose, Ecoener undertakes to:

- Having **mechanisms for complaints and claims** with appropriate procedures for their resolution.
- Monitor the effectiveness of the measures taken to resolve the reported situation.

4.1.3 Training

Ecoener **promotes a culture of respect for** human rights throughout its value chain; for this purpose, it is committed to:

- Communicate the Human Rights Policy to all persons who carry out activities and actions with Ecoener.
- Carry out related awareness-raising processes with employees, suppliers and partners.

4.1.4 Integrity

Ensuring compliance with legislation, transparency and ethics in business is a commitment.

Ecoener rejects corruption in all its forms and strives to avoid carrying out activities that incite or encourage practices that can be considered dishonest or corrupt.

4.1.5 Privacy of information

The information and privacy of persons are valuable assets. As part of the commitment established to always act ethically and responsibly, Ecoener undertakes to:

- Respect the confidentiality and the right to privacy of all persons with whom it deals.
- Use all information correctly and not disclose confidential information.

4.2 Suppliers

Ecoener's main suppliers and their employees shall be informed that their commitment to respecting human rights is essential to the company. They must therefore agree to (i) **ensure that they take the measures required to prevent any abuse or violation in this regard**, (ii) promote decent employment in their workplaces, (iii) eliminate all forms or modalities of forced or obligatory labour, (iv) reject child labour, (v) respect the right to freedom of association and to collective bargaining, and (vi) respect the local regulations in force.

5. Employees – Work practices

Respect for human dignity and rights is an inherent premise of the company, regardless of the person's location, position or level of responsibility. Ecoener supports decent, fair, favourable working conditions for all employees.

With the aim of ensuring the best working practices with regard to human rights, Ecoener makes the following commitments:

5.1 General

- **To respect the human rights of all employees.**
- To foster and encourage a culture of respect for human rights among the employees.

5.2 Decent employment

Ecoener understands decent employment as the possibility for people to have a job that helps them to fulfil their personal and professional aspirations, a job that recognises their dignity as persons and that ensures their development and growth. For this purpose, Ecoener makes the following commitments:

- **To promote decent employment**, in all places where it operates.
- To seek to ensure fair and decent remuneration, so that this compensation can contribute to improving the quality of life of all its employees and that of their families. The minimum remuneration received by the employees of Ecoener cannot be less than the minimum stated in the collective agreements and the labour regulations in force in each country in which it is present.
- To take into account the **principle of fair compensation** for work and to respect the principle of equal pay.
- To protect the right to rest.
- To establish and promote actions that facilitate the reconciliation of private and professional life.

5.3 Equality and Non-discrimination

Providing a **work environment with maximum respect for human dignity**, respecting diversity and preventing all forms of discrimination is one of the main objectives. Ecoener is committed to rejecting all forms of discrimination, and to ensuring that all people are treated with respect for their diversity. For this purpose, the following commitments are made:

- To guarantee equal opportunities among its employees and to reject any form of discrimination based on sex, ethnic origin, religion, age, disability, political

affiliation, sexual orientation, nationality, citizenship, civil status, socioeconomic status or any other distinction.

- To prevent and reject all forms of harassment, threats, intimidation or violence – whether verbal, physical, moral, sexual or psychological – in the workplace, or any other conduct that intimidates or violates the rights of persons.

5.4 Forced labour and child labour

Ecoener is committed to ensuring that in all its activities, and regardless of the place where they are carried out, children's rights and the human rights of all persons with whom it is involved are respected and guaranteed, and therefore commits itself to:

- Respect the right of persons to not be victims of forced or compulsory labour.
- Reject forced labour in all its forms and any form of labour exploitation.
- Recognise children's rights and guarantee that under no circumstances will child labour be encouraged or promoted.
- Ensure that the minimum working age is respected, in accordance with the regulations in force in the country where the activity is carried out and in accordance with ILO standards.

5.5 Health and safety

Ecoener works on the premise of offering a decent, safe, healthy work environment wherever it operates. For this purpose, it is committed to:

- **Ensure the safety and health** of all employees and personnel that work in its facilities, whether its own or externally recruited.
- Comply with the legal requirements in the places where the activities are carried out.
- Adopt the best practices, standards and procedures with regard to risk prevention and occupational health and safety.
- Promote the adoption of the highest standards with regard to risk prevention.
- Promote **a culture of safety among the employees**, encouraging responsible behaviour and risk prevention in the work environment.

5.6 Training

Ecoener recognises the importance of facilitating spaces for the professional growth and development of its employees; for this purpose, it is committed to **encouraging vocational training** and taking the necessary measures to facilitate training actions when they are required.

5.7 Freedom of association

Recognising and respecting **the freedom of affiliation, association and the right to collective bargaining**, is one of Ecoener's commitments and it has therefore undertaken to:

- **Respect the exercise of union activity**, and other forms of representation in accordance with the legislation and the practices in force in the different countries where it operates.
- Support its employees when, in the exercise of their professional obligations, they may be arbitrarily arrested.

6. Communities

Fostering sustainable development and fueling the social development of the places where it is present is the driving force behind Ecoener. Recognising the dignity of the people with whom it has relations and interacts is an inescapable commitment for the company. Thus, Ecoener acts and will always act in the best way to ensure that its activities do not cause or cannot possibly cause a negative impact on human rights and especially on the communities affected by the development of its projects.

When it comes to relations with communities, Ecoener's **goal is to be able to facilitate value creation and establish solid relationships of trust with them**, and this indisputably requires recognising and respecting their rights.

6.1 General

Ecoener respects and does not accept the violation of human rights of persons with whom it has relations, as well as its suppliers, partners and local communities where it operates; therefore, it is committed to:

- **Respecting the rights of persons and communities.**
- Complying with the provisions in the Ecoener **Community Relations Policy**.
- Paying **special attention to the most vulnerable communities**, specifically the indigenous populations and ethnic minorities.
- Respecting the right of the communities to access food, water and energy, and to enjoy a wholesome and healthy environment.
- Recognising the right to the freedom of opinion and expression and the freedom of thought and religion.
- Promoting and supporting projects of development that benefit the communities.
- **Reducing the impact on the communities to a minimum**, and encouraging dialogue and close interaction.

6.2 Ethnic minorities and indigenous peoples

Ecoener assumes responsibility for developing coordinated and systematic actions to protect the rights of these people and ensure respect for their integrity. For this purpose, it undertakes to:

- Recognise and respect the **rights of ethnic minorities and indigenous peoples**.
- Respect the right to maintain their customs and traditional ways of life.
- Encourage transparent, open and ongoing dialogue.
- Have the necessary means to avoid negative impacts on their lifestyles, habits and customs.
- Ensure fair compensation in the event of being affected negatively as a result of the actions carried out.

7. Environment

Ecoener conducts its activities in different locations around the world; thus, **ensuring the sustainable development** of these places is also a responsibility assumed by the company when it carries out its projects.

To drive the development of the territory and to preserve the environment, Ecoener will ensure the development of responsible actions around all its projects. Thus, the company is committed to acting with integrity, to looking after the environment, and to ensuring that with its actions, it provides a safe environment.

7.1 Environment

The activity carried out by Ecoener depends on the natural resources, the protection of which ensures the well-being of all. This is why the priority in each of the projects is to take respect the environment and to treat each site as what it is: something unique, a space that must be preserved. With this in mind, the following commitments are made:

- To respect the **right to the environment** of all the communities that are affected by the different activities pursued.
- To minimise the negative environmental impact and always ensure the preservation of nature and the environment.
- To establish the necessary measures to evaluate, prevent and mitigate the possible negative impacts on the environment.

7.2 Security

Ensuring that the actions pursued do not compromise the safety and physical integrity of the environment or third parties is a priority for the company. Ecoener is committed to taking the necessary measures to ensure that its resources are not used to commit violations of human rights, establishing the following principles of action:

- **Assess the security risks** in the regions of conflict or with low institutional presence.
- **Interact respectfully with public security.**
- Ensure that the private security forces that protect Ecoener personnel and properties **act in accordance with international law, legislation** and the national regulations in force.
- **Evaluate the background of the security personnel**, and avoid hiring those persons who have been involved in cases of abuse of human rights.

8. Compliance procedures

8.1 Execution and control

All Ecoener employees are required to know, understand and comply with the provisions of this Policy, regardless of the country or region where they are located. In addition, they must report any possible impact or non-compliance in this regard.

For that purpose, employees will be given a copy of this policy at the time of recruitment and will acknowledge receipt of it by signing a document pledging compliance.

Ecoener expects a great commitment from its employees to comply with these provisions.

Ecoener is committed to devoting the mechanisms required to ensure the effective implementation of this policy in all the places where it is present, taking special care regarding its correct application in all those places with greater risk of violation of human rights.

8.2 Non-compliance

The persons who violate the Human Rights Policy may be putting the company in danger; thus, they may be subject to disciplinary action and legal sanctions.

Each case of non-compliance will be analysed individually and, if necessary, sanctioned in accordance with the agreements and the legally applicable regulations.

If necessary, the matter will be referred to the competent judicial authority.

The following may be subject to disciplinary action:

- Persons who do fail to exercise due diligence in detecting a crime.
- Persons who fail to cooperate with investigations and specifically, those who destroy or conceal relevant information to an investigation, or provide false, incomplete or misleading information.
- Anyone who attempts to retaliate against anyone who, in good faith, reports a possible offence or cooperates with an investigation.

8.3 Communication and consultation

The Human Rights Policy will be **available on the website**.

In the event that an employee or an external person* deems that a situation exists which is contrary to the provisions of our Human Rights Policy, they may communicate this in the following manner:

- By email: canaletica@ecoener.es
- By post: Cantón Grande, nº 6, 6º. 15003 La Coruña. Spain.

*Ecoener shall act responsibly to **protect informants' identities**, unless otherwise specified under applicable legislation, **in order to avoid any sort of retaliation, discrimination or penalisation**.

8.4 Approval

This Policy was approved by the Board of Directors on 24 March 2023, and compliance with the Policy is effective as of that date.

8.5 Revision

This policy will be revised periodically to ensure its effective implementation, and in the event that it is necessary, pertinent adjustments can be made.

All revisions and adjustments must be approved by the Board of Directors and will be made known in the General Shareholders Meeting.

In the event of any significant change, Ecoener will communicate and make known the content of the new Policy to all its employees and other stakeholder groups.

9. Definitions

Value chain: The value chain of an organisation encompasses the activities that transform an input into a product, adding value to it. It includes the entities with which the organisation has a direct or indirect commercial relationship and which (a) supply products or services that add value to the products or services of the organisation itself or (b) receive products or services from the organisation.

Source: The Corporate Responsibility to Respect Human Rights: An interpretive 2012 guide by the United Nations (UN).

Local community: Persons or groups of persons who live or work in any area that are economically, socially or environmentally impacted (positively or negatively) by an organisation's operations.

Source: Global Report Initiative.

Corruption: "Abuse of entrusted power for private gain", which can be instigated by individuals or organisations.

Source: Transparency International.

Due Diligence: process of identification, prevention, mitigation and explanation of how an organisation addresses its potential and real negative impacts.

Source: GRI, Guidelines of the Organisation for Economic Co-operation and Development (OECD) for Multinational Companies of 2011 and The United Nations Guiding Principles on Business and Human Rights.

Human rights: Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.

Source: United Nations.

Discrimination: Act and the result of treating people unequally by imposing unequal burdens or denying benefits, instead of treating each person fairly on the basis of individual merit. Discrimination can also include harassment. This is defined as a course of comments or actions that are unwelcome, or should reasonably be known to be unwelcome, to the person towards whom they are addressed.

Source: Global Report Initiative.

Child labour: all work that deprives children of their childhood, their potential and their dignity and that is harmful to their physical and psychological development. Hence, it refers to the work that: is dangerous and harmful for the physical, mental or moral

well-being of the child; interferes with their schooling as it deprives them of the possibility of attending classes; forces them to leave school prematurely, requires them to combine study with heavy labour and that is highly time-consuming.

Source: International Labour Organisation.

Forced or obligatory labour: All work or service required from an individual under the threat of any penalty and which said individual does not offer to do voluntarily.

Source: International Labour Organisation.

Indigenous and tribal populations

The term is applied:

- (a) to the tribal peoples in independent countries whose social, cultural and economic conditions distinguish them from other sectors of the national community, and that are governed totally or partially by their own customs or traditions or by a special legislation;
- (b) to the peoples in independent countries, considered indigenous on account of their descent from populations that inhabited the country or a geographical region to which the country pertained in the time of the conquest or the colonization or of the establishment of the present state boundaries and that, whatever their legal situation may be, retain all or part of their own social, economic, cultural and political institutions.

Source: Convention 169 of the International Labour Organisation.



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