Human Rights Policy







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01 Introduction

1.1. Purpose

Through this Policy, the Group sets out the values and general principles on human rights that guide Grupo EULEN's business activities across all its operational areas and corporate strategy.

With this policy, Grupo EULEN formalizes its commitment to human rights, ensuring all activities are conducted respectfully towards people and society by implementing good practices across its business models.

1.2. Scope of application

This policy applies to all companies within Grupo EULEN. It will be distributed and communicated to all the company's stakeholders, both internal and external: all people working in the organization, our customers, the supply chain (suppliers and subcontractors), and the general public.

This policy may wholly or partially apply to any other individuals and/or legal entities linked to Grupo EULEN through a nonemployment relationship, where feasible and aligned with the policy's aims.

1.3. International leaders

This policy takes into account the following international treaties:

- » The United Nations International Bill of Human Rights, which includes:
 - a. The Universal Declaration of Human Rights.
 - **b.** The International Covenant on Civil and Political Rights.
 - c. The International Covenant on Economic, Social, and Cultural Rights.

Fundamental conventions of the International Labor Organization, as well as the Declaration of the International Labor Organization on Fundamental Principles and Rights at Work.

The following international standards and initiatives were also considered:

- » The Ten Principles of the United Nations Global Compact.
- » The United Nations Guiding Principles on Business and Human Rights.
- » The 2030 Agenda and the 17 Sustainable Development Goals of the United Nations Global Compact.

1.4. Related Policies

- » Code of Ethics
- » » N-0017-820_Grupo EULEN hiring policy
- » » N- 0018-820_Equality and work/life balance policy
- » » N-0022-800~Criminal compliance policy
- » » N-0014-820_Grupo EULEN no harassment policy
- » » N-0023-800~Anti-corruption policy
- » » N-0013-900~Information security policy
- » » N-0020-800~Corporate personal data protection policy
- » N-0024-800 Internal information system and whistleblowing channel policy

2 Our commitments

Respect for the rights of minorities and communities

Grupo EULEN is committed to respecting the rights of local communities and indigenous peoples in all its operational regions, always adhering to local laws, cultures, and customs.

For all projects directly or indirectly impacting local communities, we undertake to conduct human rights impact assessments and to minimize these impacts through open dialogue with stakeholders, focusing particularly on the most vulnerable groups.

Right to personal security

Grupo EULEN is committed to upholding the Voluntary Principles on Security and Human Rights, ensuring any private security organizations engaged with it comply with national laws and respect human rights, thereby safeguarding the security of individuals interacting with the company.

Right to privacy and protection of personal data.

Grupo EULEN respects the right to privacy and intimacy of all individuals it interacts with, and will make appropriate use of all personal data and information collected in those countries where it operates, paying particular attention to safeguarding the data of employees, customers, and users. Respect and compliance with personal data protection obligations and rights are therefore guaranteed.

Right to a fair salary

Grupo EULEN is committed to ensuring fair salaries by providing just and equitable conditions. This commitment reflects Grupo EULEN's dedication to contributing to the economic and social well-being of its principal stakeholders.



Right to health

Grupo EULEN is committed to taking all necessary actions to ensure that its products and services do not compromise the safety, health, or physical integrity of its employees, customers, and users.

Grupo EULEN also recognizes the right to a clean and healthy environment, striving to minimize environmental impact in order to safeguard public health.

Right to freedom of opinion, information, and expression

Grupo EULEN is dedicated to upholding and advocating for freedom of opinion, information, and expression within its area of influence, respecting diverse viewpoints and encouraging open communication with stakeholders.

Right to education

Grupo EULEN is committed to eliminating child labor in all its operations and business relationships while promoting children's right to education, in line with UNICEF's Rights of the Child and Business Principles.

Right to a protected environment

Grupo EULEN is committed to respecting the right to an environment that fosters personal development by minimizing the impact of its activities wherever it operates and implementing protective measures. It is also committed to taking the necessary actions to prevent forced eviction and deprivation of land, forests, and water in the acquisition, development, or other use of these resources.

Contribute to the fight against corruption

Grupo EULEN is committed to combating corruption in all forms, direct and indirect, including extortion and bribery, in line with the Tenth Principle of the United Nations Global Compact.

Support, promote and disseminate human rights

Grupo EULEN is committed to supporting and respecting the protection of internationally recognized human rights within its area of influence, complying with legislation and implementing best practices in the human rights field at all times.

Communication and whistleblowing channels and procedures are in place for reporting potential human rights violations, along with mechanisms to develop and implement actions to prevent and mitigate these risks.



The policy will be reviewed and updated regularly to accommodate changes in Grupo EULEN's business model, incorporate best practices, or respond to new regulations.



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