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1. Introduction

PASEK ESPAÑA S.A.U wishes to be an active agent for the protection of human rights in its sphere of influence and according to its degree of impact. Pasek España's Human Rights Policy formalizes, consistently with the Code of Ethics and the ten principles of the United Nations Global Compact, its commitment to this matter.

In order to define its policy, PASEK ESPAÑA S.A.U. starts from the International Bill of Human Rights and it is also based on the eight International Labor Organization core conventions. PASEK ESPAÑA S.A.U is committed to unequivocally respect the aforementioned declarations in all its activities and operations.

As a company committed to sustainable development, to the welfare of its employees and to the progress and prosperity of the communities where it develops its activities, PASEK ESPAÑA S.A.U respects and promotes the rights gathered in the aforementioned declarations and principles.

Throughout its history, PASEK ESPAÑA S.A.U has always distinguished itself for operating in accordance with the highest social and environmental standards. Even so, in order to guarantee some global requirements in this regard and satisfy the growing demands of third parties, the Company has decided to promote a policy that gathers its commitments with regard to human rights.

2. Goal

This policy sets the principles inspiring PASEK ESPAÑA's commitment to human rights in all its activities and scopes of action. The Company deems that the companies and organizations of the private sector must commit themselves to respect human rights.

PASEK ESPAÑA S.A.U. deems that due diligence in this area includes the following elements:

- The analysis of the main risks with regard to human rights, including potential impacts on vulnerable groups and gender issues.
- The establishment of commitments.
- The assignment of responsibilities concerning the performance in this area.
- The training of the Company's people.
- The supervision and monitoring of the policy implementation.
- The correction of the bad practices that may occur.

PASEK ESPAÑA S.A.U. deems that its commitment to human rights transcends the people comprising the Company and includes clients and those collaborating in the supply chain as well as the communities surrounding its facilities and centers of operation.

In all its activities and anywhere in the world, PASEK ESPAÑA S.A.U commits itself to respect human rights and to establish, where circumstances call for it, mechanisms to verify their compliance.

3. Extent and scope of application

Pasek España's Human Rights Policy applies to all the activities of the Group, regardless of the part of the world where they are being developed.

All the Company's employees have the obligation to know, understand and meet the provisions contained in this policy. Those in charge of supervising other employees of the Company must also make an effort to ensure the policy is known and observed by all the employees they supervise.

The practical application of Pasek España's Human Rights Policy is determined by the current institutional and legal framework.

4. Commitments to Human Rights

Pasek España's Human Rights Policy gathers the Company's formal commitment to the respect of human rights in its sphere of influence. Likewise, it aims to prevent any of its policies, procedures, activities and operations from causing, directly or indirectly, abuse or violation of the human rights of PASEK ESPAÑA's people or third parties related thereto.

Commitment 1. Avoiding practices that discriminate people or damage their dignity

PASEK ESPAÑA's people are entitled to enjoy a decent, safe and healthy work environment.

PASEK ESPAÑA S.A.U. commits to safeguard the existence of a work environment in the Company where there is no place for discriminatory attitudes on the grounds of gender, ethnic origin, beliefs, religion, age, disability, political affinity, sexual orientation, nationality, citizenship, civil status or socioeconomic status.

Likewise, the Company commits to provide their employees a work environment free from any kind of harassment, intimidation or violence in all their manifestations.

PASEK ESPAÑA S.A.U also scrupulously respects the individual's right not to be the victim of forced or compulsory labor.

Commitment 2. Eradicating child labor

PASEK ESPAÑA S.A.U commits to ensure that none of its activities or operations in any part of the world involve cases of violation of children rights and to verify in their recruitment processes that all candidates exceed the minimum age to work.

In this regard, the Company commits to scrupulously meet the labor law in force in each of the jurisdictions where it operates, the international conventions and other legal and regulatory labor provisions with regard to child labor and to implement, where necessary, measures to ensure its total and complete eradication.

Commitment 3. Facilitating freedom of association and collective bargaining

Regardless of the sphere where it develops its activities, PASEK ESPAÑA S.A.U respects its employees' right to freedom of association, union freedom and collective bargaining and it will publicly express this commitment.

PASEK ESPAÑA S.A.U will guarantee the respect of freedom of association and collective bargaining by strictly respecting the role and the responsibilities that are incumbent on the employees' representatives in accordance with the law in force.

The Company will facilitate that its employees can meet to freely discuss questions relevant for their working or employment conditions.

Commitment 4. Protecting people's health

PASEK ESPAÑA S.A.U commits to offer its employees a safe and healthy work environment by assuming advanced rules and procedures with regard to occupational health and safety management, in scrupulous accordance with the legal requirements that are applicable in each case.

Commitment 5. Offering a decent job

PASEK ESPAÑA S.A.U remunerates its employees in a decent way according to their abilities, responsibilities and duties and in line with the applicable legislation and the conditions of the markets where it operates.

PASEK ESPAÑA S.A.U will also guarantee the people's right to privacy with regard to their personal details.

Commitment 6. Contributing to fight corruption

PASEK ESPAÑA S.A.U condemns corruption in all its forms and it has procedures and tools to prevent its activities from, directly or indirectly, encouraging or favoring corruption.

5. Procedures for the compliance of the Policy

Training and awareness

PASEK ESPAÑA S.A.U. will make this Human Rights Policy public so its content is known and its compliance is assessed by all the Company's stakeholders.

PASEK ESPAÑA S.A.U deems that the compliance of the commitments assumed with regard to human rights by its employees and executives lies to a significant extent in the knowledge thereof. For this reason, the Group will include specific actions within its training and communication schemes.

Implementation and control

PASEK ESPAÑA S.A.U commits to devote the necessary resources for the effective implementation of this Human Rights Policy. In this sense, the Company will periodically analyze the human right issues applicable to its activity and it will implement mechanisms enabling it to assess the risk of breaching them in the spheres in which it operates. Likewise, the Company commits to revise its internal regulations to adjust them to the contents of this Human Rights Policy.

PASEK ESPAÑA S.A.U expects from all its employees a high level of commitment to the compliance of this policy. The failure to comply with this policy and any other aspect related to the respect of human rights will be analyzed in accordance with internal procedures, legal regulations and current conventions and they may result in disciplinary or labor measures set by internal regulations or the law.

Consultation and notification procedure

PASEK ESPAÑA's employees have the obligation to report to the Company, confidentially and safe from retaliations, any breach of the commitments gathered in this policy they may notice. Those that are not employees of the Company but notice potential bad practices in this field may also report it.

Public spreading

PASEK ESPAÑA S.A.U will publish this policy on its website and inform its suppliers about it.

Revision and update

Pasek España's Human Rights Policy will be approved by the Board of the Company. Its content will be revised with the regularity set by the Board in order to ensure that its contents meet Pasek España's needs and the best international practices in this field.