



HUMAN RIGHTS POLICY- GALFER



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1. OBJECT

This policy formalizes and develops the commitment to human rights of Industrias Galfer, S.A. and/or any of the companies in which it has or may have direct or indirect control (hereinafter "GALFER"), in a manner consistent with the¹ ten principles of the Global Compact of United Nations and so that they are scrupulously respected within its organisation, all in accordance with the highest international standards.

This Human Rights policy is complemented and developed by the GALFER Code of Ethics and Conduct and the rest of GALFER's corporate policies.

In defining its policy, GALFER is² a party to the International Charter of Human Rights and draws inspiration from, among others, the following international declarations and standards:

- The United Nations Guiding Principles on Business and Human Rights.
- The Declaration of the International Labour Organization (ILO) on fundamental principles and rights at work.
- The principles and rights set out in the main ILO conventions.
- The Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.
- The OECD Due Diligence Guide.
- The Sustainable Development Goals (SDGs) adopted by the United Nations.
- The United Nations Principles for Responsible Investment (PRI).

In addition, respect for human rights is a fundamental part of the purpose of GALFER and an aspect inextricably linked to each of the Sustainable Development Goals of the UN 2030 Agenda, which is based on prosperity, the planet and people as essential axes for sustainable development.

2. GENERAL PRINCIPLES OF GALFER

On the basis of the above, GALFER undertakes to guide its action with regard to human rights based on the following principles:

¹ <https://www.pactmundial.org/>

² The following documents constitute the International Bill of Human Rights: (i) the Universal Declaration of Human Rights; (ii) the International Covenant on Economic, Social and Cultural Rights; and (iii) the International Covenant on Civil and Political Rights and its two optional protocols.



- Fair, dignified and respectful treatment of people. Reject practices that discriminate or impair the dignity of individuals on the basis of age, gender, marital status, nationality, religion, disability, race or ethnicity, or any other personal circumstances.
- Free work. Reject child labour and forced or compulsory labour.
- Commitment to the right to freedom of association, unionization and collective bargaining and fair defence. Respect the freedom of association and collective bargaining.
- Combating corruption and protecting privacy.
- Safe and healthy working conditions. Promote decent, safe and healthy working environments, subject to a health and safety management system in accordance with all laws and regulations and industry best practices.
- Due diligence. Identify, with due diligence, possible situations of risk of human rights violations and establish mechanisms to prevent and mitigate such risks.

3. SCOPE OF APPLICATION

This policy applies to all employees of GALFER, as well as those who hold management positions or belong to the administrative bodies of GALFER companies and those who, by maintaining a close or permanent collaboration relationship with GALFER, adhere to, or are subject to the principles set forth in this policy as a result of the nature or purpose of their activities.

In addition, GALFER will ensure that suppliers, contractors, customers and third parties who maintain professional relationships with GALFER are aware of the principles regulated in this policy.

4. SPECIFIC COMMITMENTS FOR GALFER'S VARIOUS INTEREST GROUPS

- Working people of GALFER :

GALFER has a set of internal policies and regulations that ensure the rights of people working in it. Therefore, it respects and promotes internally the observance of the following rights:

- The right to freedom of opinion, information and expression, respecting the diversity of opinions in the company and encouraging dialogue and communication.
- The right to freedom of association and collective bargaining of its employees, as well as the role and responsibilities of workers' representation in accordance with the laws in force in each country.
- The right to data privacy and privacy.



- The right to a safe and healthy working environment.
- The right to decent working conditions with adequate remuneration and equal treatment, preventing people from being treated differently or less favourably because of characteristics that are not related to their merit or work requirements.
- The right to a working environment free of harassment or contrary to respect for human rights and dignity, ensuring that appropriate procedures are available to report any such conduct, treat and correct it with complete confidentiality and diligence, as well as due consideration and promptness.

GALFER will ensure that working people, within their scope of action and responsibility, respect Human Rights and contribute to the fulfillment of the commitment made by GALFER through this Policy.

- Proveedores:

GALFER will encourage the suppliers with whom it interacts to also show strict respect for Human Rights recognized in international and national legislation of each of the countries in which they operate.

In this sense, GALFER has approval systems that integrate the analysis of fundamental rights and procedures to help suppliers with whom it establishes contractual relations assume, within their scope of competence, the protection of human rights.

- Business partners :

GALFER will ensure that its business partners are aware of and respect the principles and commitments made in this policy.

- Customers :

GALFER undertakes to avoid any unjustified discrimination in the recipients of its product offer, respecting at all times the privacy of your data and your privacy.

5. DISSEMINATION, CONTROL AND ENFORCEMENT

GALFER will give this policy the appropriate dissemination to be known internally and externally by the various interest groups.

GALFER has the channel for ethical consultations and complaints to incorporate complaints related to the principles and rules of action referred to in this policy.

6. APPROVAL

This policy has been approved by the GALFER Board of Directors on December 17, 2024.



This Policy will be revised and updated when necessary to adapt it to possible regulatory, social, economic or organizational changes.