

# HUMAN RIGHTS

## POLICY

PROPOSING BODY:  
**ETHICS,  
SUSTAINABILITY AND  
PARTNERSHIPS  
DEPARTMENT**

DATE OF APPROVAL:  
**17 NOVEMBER 2023**



Important information about this document	
Document identification	Human rights policy
Territorial scope of the Procedure	Global
Section for other developed policies	None
Rules that are replaced by this document	None
Rules that this document revokes	None
Related rules	Criminal Compliance Policy, Internal Due Diligence Procedure, External Due Diligence Procedure, Whistleblower Channel Policy, Code of Ethics as well as the Procurement Policy and the procedures it establishes for the management and selection and approval of suppliers.
Executive areas and positions affected by this document	All areas of Grupo Ilunion, S.L.
Affected staff	All members of Grupo Ilunion, S.L., business partners, value chain suppliers and third parties
Main responsible for its monitoring	Ethics, Sustainability and Partnership Department and ILUNION's Steering Committee
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# 1. Definitions

Definitions of concepts that will be used frequently in this document are listed below (quoted in *italics*):

***Value chain:*** Activities related to the production, design, sourcing, extraction, manufacture, transport, storage and supply of raw materials, products or parts of products of an undertaking, to the development of a product of an undertaking or to the development or provision of a service, as well as entities involved in any of those processes, and activities related to the sale, distribution, transport, storage and waste management of the products of an undertaking or to the provision of services (excluding the management of product waste by private consumers), as well as entities involved in any of those processes.

***Board of Directors:*** ILUNION's highest governing and representative body, insofar as it has the fundamental responsibility and authority for ILUNION's activities, governance and policies.

***Steering Committee:*** The body responsible for approving ILUNION's policies.

***Human rights due diligence:*** Procedure for the identification, prevention, mitigation, elimination and remedy of adverse effects on the human rights of individuals or groups.

***ILUNION / the Organization:*** Refers to Grupo Ilunion, S.L. and the entities within its legal control perimeter, including those in which it has a minority shareholding.

***Members of the Organization:*** Members of the Governing Body, managers, employees, workers or temporary employees or employees under a collaboration agreement, workers undergoing training and internships and all other persons under the hierarchical subordination of any of the above.

***Stakeholders:*** For the purposes of this Policy, this group includes natural or legal persons who may be affected or be perceived to be affected by ILUNION.

***Vulnerable stakeholders:*** Stakeholders who are in situations of marginalization and vulnerability due to specific contexts or intersectional factors, such as, inter alia, sex, gender, age, ethnicity, indigenous status, migration status, disability, as well as social and economic status, including stakeholders living in conflict-affected or

high-risk areas.

**Suppliers:** Any natural or legal person, except *Members of the Organisation*, who supplies goods or services of any kind to ILUNION, regardless of the type of remuneration received: fixed, variable linked to sales/profits or mixed. By way of example, counterparties in contracts for the manufacture and supply of all kinds of goods, provision of services (collaboration, commission, advice, auditing, consultancy, software development, logistics and transport, advertising creation, advertising media management, printing of graphic materials, software and technology licensing, sponsorship, etc.).

**Business partners:** any legal or natural person, other than *Members of the Organisation*, with whom the *Organisation* has or intends to have any business relationship.

**Third party:** any natural or legal person not falling into the above categories.



## 2. Purpose of the *Human Rights Policy*

The purpose of the Human Rights Policy is to formalise ILUNION's commitment to human rights in order to define the principles that apply in the relationship with its stakeholders for the implementation of human rights due diligence, in accordance with the United Nations Guiding Principles on Business and Human Rights (hereinafter, the Guiding Principles) and the documents and texts to which they refer, among others, international declarations such as the Ten Principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the principles and rights set out in the core conventions of the International Labour Organization (ILO), the ILO Declaration on Fundamental Principles and Rights at Work, and the Sustainable Development Goals (SDGs).

ILUNION also defends and endorses the approach of the Convention on the Rights of Persons with Disabilities (2006), which aims to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity.

At ILUNION we recognise that human rights are universal standards that ensure respect for the dignity of all people and constitute an indispensable requirement in the actions of all our companies.

Through this Policy, ILUNION establishes a human rights due diligence system that ensures the detection, prevention, mitigation, elimination and remediation of potential and actual adverse effects in its own activities, in its subsidiaries and in the relationship with its value chain, as well as in its acquisition, merger and investment and disinvestment operations and risk management processes.



### 3. Field of implementation

This Policy is applicable to all ILUNION companies and, in those in which ILUNION participates as a minority shareholder, ILUNION promotes the Policy's knowledge and implementation through its participation in the governing bodies of the company.

This Policy is mandatory and applies to the entire Organization and its professionals are obliged to know, understand and comply with the provisions contained in this Policy, regardless of the position and function they hold.

All ILUNION company professionals are expected to make a real commitment to upholding human rights, reporting any non-compliance through the channels provided. This Policy also applies to all stakeholders, including professionals in the ILUNION value chain.

## 4. Scope

ILUNION's commitment to respect human rights refers to all applicable international, regional and national human rights standards, especially those that affect vulnerable groups. This commitment also recognises the adverse effects on human rights that occur as a consequence of negative impacts on the environment.

ILUNION recognises that its responsibility to respect human rights may be additional to compliance with applicable law if this does not reflect international standards. Our principle is that where national law and international human rights standards differ, the more protective standard will be followed.

## 5. Human rights due diligence system

In order to fulfil its commitment to respect human rights, ILUNION implements a human rights due diligence system that aims to detect, prevent, mitigate, eliminate and remedy actual and potential adverse human rights effects that may negatively impact its stakeholders. These adverse effects are assessed and prioritised according to their severity and likelihood of occurrence.

Understanding that human rights due diligence is a continuous process, ILUNION has established a human rights management model that includes the following actions:

- a) Identify the actual and potential adverse effects that the operations and activities carried out by the Group's companies and their subsidiaries may have on human rights, directly or through a third party, including their value chains.

ILUNION has identified the priority human rights areas for each of the Group's businesses and value chains.

- b) Develop mechanisms to prevent, mitigate, eliminate and remedy such adverse effects through concrete measures and action plans for each business area.

- c) Regularly assess the effectiveness of the due diligence system through monitoring indicators.
- d) Communicate key milestones of the due diligence system in accordance with Directive 2022/2464 on corporate sustainability reporting and other applicable information and reporting standards.
- e) Promote a culture of respect for human rights through measures to raise awareness and train professionals in this area in all Group companies.
- f) Establish complaints and grievance mechanisms, with sufficient safeguards and adequate resolution procedures, to address potential cases of adverse human rights impact on any stakeholder. ILUNION, through the *ONCE Social Group*, has made different internal channels available to *Members of the Organisation*, *Business Partners* and *Third Parties* so that they can make any type of *Notification* that is related to possible *Breaches* of this *Policy* and which enjoy the strictest confidentiality and respect in terms of data protection.

ILUNION also reflects the principles recognised in this *Policy* in other related policies and procedures such as the *Criminal Compliance Policy*, the *Internal Due Diligence Procedure*, the *External Due Diligence Procedure*, the *Whistleblower Channel Policy*, the *Code of Ethics*, the *Procurement Policy* and the procedures it establishes for the management, selection and approval of suppliers.

ILUNION has also made available to the *Members of the Organisation*, *Business Partners* and *Third Parties* a channel for making Communications on ethical matters, which is managed by the *ONCE Social Group's Transparency and Ethics Observatory*, the link to which is as follows:

<https://www.once.es/grupo-social-once/canal-de-denuncias>

Likewise, *ILUNION* has a channel for any communication related to a *Consultation*, the link to which is as follows

[canaldedenuncias@gen.ilunion.com](mailto:canaldedenuncias@gen.ilunion.com)

The whistleblower protection statute also establishes the following options:

a) Written communications:

- By means of the form on the *Organisation's* website:

[www.ilunion.com/es](http://www.ilunion.com/es)

- To the following postal address:

**Órgano de Prevención Penal**  
Calle Albacete, 3,  
28027, Madrid, España

b) Verbal communications:

- Through the hierarchical superior
- Through the Head of another Department

c) Face-to-face meeting with the *Criminal Prevention* Body or with one of its members or with a person delegated by them; the Complainant must be heard within a maximum period of seven (7) days from the request.

In order to achieve the above, ILUNION:

- prioritises dialogue and continued consultation with potentially affected and most vulnerable stakeholders at all stages of the due diligence process; and
- uses its leverage to influence value chains and business partners on any adverse human rights impacts even if there is no direct relationship with them.

## 6. Relations with stakeholders

ILUNION understands that its commitment to respect human rights transcends the people who form part of ILUNION and includes clients and users, nearby communities and those who collaborate along the value chain, as well as society in general.

Specifically, ILUNION is committed to respecting the human rights of affected stakeholders, understood as individuals, groups or communities with legitimate rights or interests that are or may be affected by the adverse effects derived from the activities of the Group's companies or entities that form part of its value chain, as well as the legitimate representatives of these individuals or groups, including workers and their representatives and trade unions of the company, its subsidiaries and its entire value chain.

ILUNION also undertakes to pay special attention to respecting the human rights of vulnerable stakeholders, understood as those in situations of marginalisation and vulnerability, with special attention to disability.

### With our employees

ILUNION is committed to complying with the applicable labour law framework and aims to respect labour rights in accordance with international standards. This includes the rights recognised by the ILO core conventions and other particularly relevant ones such as:

- Equality and inclusion in employment and occupation:
  - Ensuring a work environment where there is no room for discriminatory attitudes based on gender, ethnicity, creed, age, disability, sexual orientation, nationality, marital status, socio-economic status, political opinion or any other personal difference.
  - Ensuring equal pay for similar positions in similar contexts.
- Freedom of association, freedom of unionisation and the right to bargain collectively.
- Elimination of forced labour and child labour.

- Ensuring an environment free of health and safety hazards in all our facilities and activities anywhere in the world.
- Providing a work environment free from any form of harassment, intimidation or violence in any of its forms.
- Protecting and ensuring proper use of data and the right to privacy.
- Adopting mechanisms for work-life balance.

### With our clients and users

We continue to work to offer products and services that contribute positively to improving people's well-being, always taking into account respect for human rights and identifying possible adverse effects in our relationship with them, taking into consideration all diversity and inclusion criteria to avoid any kind of discrimination.

ILUNION is also committed to promoting awareness of human rights among their customers and users, through the communication of this Policy and by promoting awareness campaigns, supporting initiatives and holding international days. Likewise, ILUNION expects its customers to behave in a manner that respects human rights in all its work centres, industrial plants and hotels.

### With our value chain

ILUNION has broad and diverse value chains and recognises the crucial role that its partners and suppliers play in complying with this *Policy*.

ILUNION considers the suppliers in their value chains to be a key ally in the compliance with this Policy and, therefore, they assume a shared responsibility for the strict respect of recognised human rights in the development of their activity.

Our *Procurement Policy* and the procedures it establishes for the management and selection and approval of suppliers define our expectations in relation to respect for the human rights of the people who are part of our value chain.

In this way, ILUNION is committed to and promotes human rights in its relations with its suppliers and the people employed in its value chain:

- Disseminating this *Policy* among suppliers, contractors and collaborating companies throughout its value chain.
- Accompanying suppliers in the prevention, mitigation and effective remediation of potential adverse effects.
- Establishing procedures for assessing, standardising, evaluating and monitoring their suppliers in their value chains according to the severity and likelihood of occurrence of adverse human rights effects.
- Implementing additional controls for higher-risk suppliers so that they subscribe to the principles of this policy and ensure that their employees are hired in compliance with current labour legislation, international conventions and other legal and regulatory provisions of a labour nature.
- Avoiding the continuing operation with suppliers that do not demonstrate progress in this area.
- In particular, suppliers shall, both in their companies and in their own value chains: (i) take the necessary measures to eliminate all forms of forced labour and any form of modern slavery in their organisation; (ii) expressly reject the use of child labour; (iii) respect the freedom of association and the right to collective bargaining of their professionals, avoiding any discriminatory practice based on any condition or characteristic in terms of employment and occupation; and (iv) set the wages of their professionals in accordance with applicable laws, respecting minimum wages, overtime and social benefits.

### With society

ILUNION is committed to the defence of human rights, to sustainable development and to the promotion of true inclusion for all people in the labour market in all the communities in which it operates and has a presence and in society in general.

ILUNION is committed to protecting specially the most vulnerable groups in society and the rights of minorities beyond what is required by local legislation.

ILUNION's activities will respect the environment and the natural surroundings of local communities by making responsible use of resources, and will seek to generate positive impact in terms of the protection of biodiversity and natural habitats thus guaranteeing the right to a clean and healthy environment for all people.

The historical and cultural heritage areas of the communities must also be protected, respecting and even being ambassadors of the tradition and culture of the locations in which ILUNION is present.



## 7. Complaint and redress mechanisms

At ILUNION we are committed to generating mechanisms for participation and dialogue with stakeholders.

ILUNION understands that complaint and grievance mechanisms are a fundamental part of ensuring human rights due diligence and serve as an early warning mechanism and a tool for evaluating the effectiveness of its own human rights due diligence policies and measures.



The grievance and redress mechanism has been reviewed in June 2023 in order to:

- i) ensuring compliance with the eight criteria for effectiveness proposed by the Guiding Principles: legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, based on participation and dialogue;
- ii) The purpose of the *Whistleblowing Channel Policy* is to specify the criteria for the use of the different communication channels existing in ILUNION through which *Members of the Organisation*, *Business Partners* and *Third Parties* can submit complaints about possible non-compliances that may arise in the course of ILUNION's activities.

All *Members of the Organisation* have the obligation to report individual or collective behaviour or activities that occur in the context of their activities in the *Organisation* and that may involve a breach of the content of this text or of the other documents that make up the Organisation's Criminal Compliance Management System, as well as any breach of the legislation in force, regardless of whether such behaviour has been ordered or requested by a superior.

In the event that a Notification made through the Whistleblowing Channel contains a Consultation, this will be redirected by the Criminal Prevention Body to the corresponding body or department to be managed and processed.

This revision is in strict compliance with Law 2/2023 of 20 February on the protection of persons who report regulatory infringements and the fight against corruption, which came into force in June 2023 and which guarantees the anonymity of the whistleblower.

All professionals of the Group's companies are expected to act as a first line of defence of human rights, reporting any possible impact on human rights or any breach of this *Policy* through the channels provided.



## 8. Communication

This Policy is available to all *Members of the Organisation, Business Partners* and *stakeholders* via

[www.ilunion.com/es](http://www.ilunion.com/es)

It will also be the object of appropriate communication, training and awareness-raising actions to ensure that it is properly understood and put into practice in all the companies that make up ILUNION and for all professionals.



## 9. Approval of this Policy

This *Policy* was initially approved by the Steering Committee on 26 February 2021 and was last modified on 17 November 2023. In order to update it, ILUNION's stakeholders have been consulted on a number of occasions.

The *Policy* is approved and revised by the ILUNION Steering Committee, which reviews the content of this document annually or whenever it is deemed necessary, in order to adapt it to the evolution of ILUNION's activities and companies, as well as to new developments in the businesses that could generate possible effects in the area of human rights.

The *Board of Directors* is responsible for taking the relevant decisions regarding the implementation of human rights due diligence in ILUNION. In order to fulfil this function, the Board shall receive regular information on the measures and procedures adopted with the aim of effectively monitoring the provisions of this *Policy*.

### Date of approval

This policy was approved by the ILUNION Steering Committee on 17 November 2023 and is effective from the date of its approval.

### Publication

This policy will be available on ILUNION's Good Governance Portal, where the group's internal regulations can be consulted via the following link

<https://sistemasilunion.sharepoint.com/sites/BuenGobIlunion>

