

HUMAN RIGHTS POLICY

Index

- INTRODUCTION 2
- PURPOSE 2
- SCOPE 2
- GENERAL PRINCIPLES FOR ACTION 2
- EXTENSION OF THIS POLICY TO THIRD PARTIES..... 5
- INTERPRETATION AND COMPLIANCE..... 5
- MONITORING 6

➤ INTRODUCTION

As set out in the Code of Ethics, respect for human rights as recognised in domestic and international legislation is one of the basic principles that must govern the behaviour of members of the administrative body, the senior management and the workers (hereinafter called the “**Workforce**”) of Sidenor Group member companies (hereinafter “**Sidenor**”). Accordingly, the Workforce of Sidenor must, in all circumstances, behave in an ethical, exemplary manner and refrain from any actions that may infringe applicable regulations.

In regard to respect for human rights in particular, the Code of Ethics establishes that all actions by Sidenor and its Workforce must maintain strict observance of the human rights and civil liberties included in the Universal Declaration of Human Rights.

➤ PURPOSE

Sidenor considers that businesses and organisations must undertake to respect human rights. Accordingly, it has drawn up this policy setting out its commitment to do so in all its operations, in its relations with its Workforce, with its customers, with its suppliers, with third parties and with the communities in which it operates.

The policy seeks to minimise the risk of infringing human rights by setting out principles and guidelines for action to identify and prevent potential infringements.

➤ SCOPE

This policy applies to the whole Sidenor Workforce and to all those parties closely or permanently linked to Sidenor who sign up to or are obliged to comply with the principles set out herein as a result of the nature or purpose of their activities.

➤ GENERAL PRINCIPLES FOR ACTION

To attain the goals and undertakings set out in this policy, Sidenor takes on board and seeks to foster the following basic principles, which must govern its actions in all areas:

- ✓ **Avoiding Discriminatory Practices**

Sidenor undertakes to strive to attain a working environment free from discrimination on grounds of gender, race, ethnicity, religion, age, disability, political or trade union affiliation, sexual orientation, nationality, marital status or socio-economic status, and from any conduct that entails personal harassment.

All members of Sidenor's Workforce must be treated fairly and with respect by their superiors, subordinates and peers. There will be zero tolerance for verbal or physical abuse, hostility or offensive behaviour.

To ensure compliance with this principle, Sidenor has adopted a Code for the Prevention of Harassment and acts of violence in the workplace and a protocol for action should any such acts be reported (Procedure PA-SP-9020 on Intervention in Case of Mobbing) which seeks to prevent all degrees of harassment, including those based on discrimination of any kind.

Sidenor realises the importance and fully supports the principle of equal treatment and opportunities between women and men. As a commitment in this matter, it has therefore set up an equality plan tailored to the current circumstances of the company that sets out specific measures indented to help attain this goal.

✓ **Diversity**

Sidenor undertakes to provide a working environment in which diversity and the richness of an international culture are highly valued.

✓ **Rejection of the Use of Forced Labour or Child Labour**

Sidenor undertakes to strive to ensure that none of its operations involves forced or child labour or exploitation. In line with the Workers' Statute, children under 16 years of age may not be recruited for employment, and there is a prohibition on overtime, night work and/or activities/jobs for which limitations are set on contracting under the provisions of law in force at the relevant time. Accordingly, Sidenor strives to ensure that its recruitment policies include measures to monitor minimum working age requirements and prevent any breach thereof, in line with the standards of the International Labour Organisation or any stricter legislation applicable.

✓ **Offering a decent job and fair working conditions**

Sidenor undertakes to pay a decent wage to its Workforce in line with the abilities and expertise of each member. Sidenor further undertakes to comply with labour legislation wherever it operates; to assure the right of the Workforce to time off; and to foster an acceptable work/life balance for its Workforce, to which end it will implement measures to help reconcile work and personal life.

All members of the Workforce must be given equal opportunities for career development. To that end, Sidenor undertakes to set up an effective equal opportunities policy so that its employees can develop their careers based on the

principle of merit. Promotions will always be decided on the basis of objective criteria and assessments. The company undertakes to maintain a policy of investment for the training and personal and career development of its Workforce.

✓ **Safeguarding the Health of People**

Sidenor undertakes to provide its Workforce with a safe, healthy working environment that complies strictly with the applicable requirements of law on workplace health and safety and the prevention of occupational risks.

✓ **Environmental Friendliness**

Protecting the environment and natural resources, combating climate change and striving to ensure sustainable economic development are major factors in the planning, execution and implementation of the group's operations. Sidenor thus strives to maintain the utmost respect for the environment in the course of its operations, and to minimise any negative environmental effects that they may have.

Sidenor seeks to help conserve natural resources and areas of particular ecological, landscape, scientific or cultural interest, and to show respect for the ownership and use of land and ensure right to enjoy natural resources such as water by using them rationally and sustainably.

To that end, it seeks to establish best practices and foster knowledge and use of same by the workforce, and undertakes to comply strictly with applicable environmental legislation and manage all natural resources sustainably.

✓ **Facilitating Collective Bargaining and the Right to Organise**

Sidenor respects the right of its workforce to organise in trade unions and to engage in collective bargaining. Sidenor strives to maintain a constructive atmosphere in its dealings with the representatives of the workers in the Workforce, to foster continual improvement in labour relations.

Insofar as possible, Sidenor will make it possible for members of its Workforce to meet and freely discuss significant work-related issues.

✓ **Protecting People, Interests, Goods and Know-how**

Sidenor does not support violence. Actions must be based on risk analysis and the taking of mitigating measures to protect people, their best interests, property and know-how. The use of force and weapons in enforcing safety and security must be avoided. Sidenor will resort to the security forces only when the situation so requires and in compliance with the law.

✓ **Guaranteeing the Right to privacy**

Sidenor undertakes to request and use only such personal data on members of its Workforce as may be necessary for the effective management of its business or for compliance with applicable regulations.

Sidenor will also take all necessary measures to maintain the confidentiality of personal data in its possession and to ensure those data are transferred when necessary for business reasons with the confidentiality required under the legislation in force.

✓ **Encouraging commitment to human rights throughout the value chain**

Sidenor seeks to spread its commitment to human rights throughout its value chain. Sidenor also undertakes to report this policy to suppliers, contractors, collaborators, customers and third parties and to encourage all the various links in the value chain to develop their own policies in this regard or, in the absence of such policies, to sign up to that of Sidenor.

➤ **EXTENSION OF THIS POLICY TO THIRD PARTIES**

Responsible, ethical behaviour is a watchword for the actions of Sidenor and its suppliers must respect and comply with the policies, rules and procedures in this regard approved by Sidenor in the relevant matters. Accordingly, Sidenor will foster the application of this policy at its suppliers, agents and collaborators and at third parties with which it maintains business relationships.

➤ **INTERPRETATION AND COMPLIANCE**

This policy establishes the principles and commitments which are to be observed and complied with by Sidenor and its Workforce in the course of their activities. Therefore, Sidenor will regularly remind the full Workforce of the contents of this policy via informational and training actions.

Any member of the Workforce who learns of or has grounds for suspecting any infringement of this policy, or who has doubts, concerns or complaints concerning its contents, must inform their superiors or the Head of Human Resources at their workplace immediately so that the matter can be dealt with. Such reports may be made confidentially, anonymously or otherwise. Sidenor has provided the Workforce and third parties with the codigoetico@sidenor.com e-mail address, and has set up a whistle-blower channel on its website so that anyone acting in good faith can submit anonymous, confidential queries and report any breach of this policy.

Sidenor will take such measures as may be necessary to avoid any adverse consequences or reprisals for persons who make use in good faith of the channels provided for reporting behaviour potentially in breach of the principles set out in this policy.

➤ **MONITORING**

The Sidenor Ethics Committee, set up to supervise compliance with the Code of Ethics and the policies and guidelines through which its principles are implemented, is also responsible for monitoring compliance with this policy, for settling any incident or query that may arise concerning its interpretation and for taking suitable measures to ensure that it is properly complied with.

Sidenor further undertakes to review and update this policy, seeking to strengthen and enhance this human-rights-based approach throughout its area of influence.