



CIE Automotive

Human Rights Policy

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1. Introduction

This Human Rights Policy for CIE Automotive, S.A. (“**CIE Automotive**” or the “**Company**”, and the corporate group for which CIE Automotive is the parent company,¹ the “**Group**”) formalises its commitment on this subject, in a manner consistent with its Code of Professional Conduct and the Ten Principles of the United Nations Global Compact (<https://unglobalcompact.org/>).

When defining this Policy, CIE Automotive has taken the International Human Rights Charter² as a starting point, and it is also based on:

- ✓ The International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.
- ✓ The United Nations Guiding Principles on Business and Human Rights.
- ✓ The OECD Due Diligence Guidance.
- ✓ The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.
- ✓ The United Nations Sustainable Development Goals (SDGs).

Respect for human rights is one of CIE Automotive’s fundamental commitments, as well as an aspect inseparably linked to the United Nations 2030 Agenda for Sustainable Development.

2. Objectives and scope

CIE Automotive believes that all enterprises and organisations, including those from the public sector and those from the private sector, must make a commitment to respecting human rights, and it is therefore committed to respecting those rights during all of its activities. It applies that commitment not only to the Group’s employees, but also to its clients and suppliers, and to the communities where its facilities are located, including indigenous peoples.

This Policy’s objective is to minimise the risk of human rights violations, by establishing principles and guidelines for due diligence in relation to those rights, so that this Policy can be used to identify, prevent, mitigate, and remedy all potential negative impacts. As a result of this, CIE Automotive’s activities must include:

- ✓ Establishing commitments
- ✓ Assigning responsibilities
- ✓ Periodically evaluating the due diligence system’s effectiveness
- ✓ Correcting errors and improper practices
- ✓ Providing training on the subject of human rights and promoting a culture of respect for them

CIE Automotive’s Human Rights Policy applies to all of the Group’s activities, regardless of the worldwide location where they are being performed.

¹ With the subsidiaries being the companies where CIE Automotive, S.A. directly or indirectly owns more than 50% of the share capital and/or has appointed more than half the members of the management body.

² The International Human Rights Charter is understood to consist of the following documents: 1. the Universal Declaration of Human Rights; 2. the International Covenant on Economic, Social and Cultural Rights; and 3. the International Covenant on Civil and Political Rights and its two Optional Protocols.

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3. Commitments

CIE Automotive performs all of its activities in accordance with the principle of respect for human rights, and it is committed to:

✓ **Avoiding discriminatory practices**

CIE Automotive is committed to ensuring a work environment free from any discrimination based on gender, race, ethnicity, religion, age, disability, political views, union affiliation, sexual orientation, nationality, marital status, or socio-economic or hierarchical status, or any other form of discrimination.

✓ **Rejecting any use of forced labour or child labour**

CIE Automotive is committed to ensuring that no use of forced labour or child labour exploitation is taking place during any of its activities. CIE Automotive must therefore ensure that its procurement and contracting policies stipulate prevention and control measures related to the minimum working age, in conformity with the standards of the International Labour Organization, or in conformity with the applicable legislation whenever it is more restrictive. In addition, CIE Automotive is committed to complying with the labour legislation existing in the countries where it operates, and to implementing the appropriate corrective measures whenever necessary.

✓ **Offering decent employment**

CIE Automotive is committed to providing fair compensation to its employees, in accordance with the skills and knowledge they possess. In addition, CIE Automotive ensures compliance with the labour legislation existing in all of its locations, as well as the employees' right to rest and leisure. In line with this commitment, the Groups also strives to implement measures that allow for flexible working hours.

The compensation package for employees matches or exceeds the legal minimums existing in each geographic region, and remains in line with the industry standards in each area. The Company is also committed to the concept of providing a living wage that covers basic daily needs. In addition, to ensure that equal pay exists across all of its operations, the Group is not only committed to yearly publishing of the ratio between the minimum legal salary and the lowest employee salaries at companies newly acquired by the Group, but also to implementing corrective measures whenever that ratio fails to comply with the commitment to adequate minimum salaries.

✓ **Protecting personal health**

CIE Automotive is committed to offering its employees a safe and healthy workplace, including strict compliance with all applicable legal requirements on occupational health and occupational risk prevention.

✓ **Facilitating collective bargaining and freedom of association**

CIE Automotive respects its employees' rights to collective bargaining and freedom of association. To the greatest extent possible, the Group must make it possible for its employees to freely gather and discuss pertinent issues related to their employment.

✓ **Encouraging a culture of respect for human rights, and raising awareness of this subject among all employees.** This especially applies to locations with the greatest risk of those rights being violated.

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- ✓ **Promoting a commitment to human rights across the entire value chain**

CIE Automotive must distribute its commitment to human rights across its entire value chain. It is also committed to providing a copy of this Policy to its suppliers, contractors, collaborating enterprises, and clients, while encouraging and incentivising the various components of the value chain to develop their own policies on this subject, or in cases where one has not been developed, to formally agree to comply with this Policy.
- ✓ **Respecting the environmental rights** of all communities where CIE Automotive operates, taking into account their needs and expectations, and especially observing the rights that communities have regarding access to food, water, sanitation, energy, education, health, and housing, and their right to enjoy the benefits of a clean and healthy environment.
- ✓ **Respecting indigenous communities and their traditional ways of life**

CIE Automotive is committed to dedicating the necessary means to ensure that its activities do not have a negative impact on the traditional ways of life and work of the people living in the areas where it operates. Therefore, in accordance with the International Labour Organization’s Indigenous and Tribal Peoples Convention, 1989 (No. 169) and the United Nations Declaration on the Rights of Indigenous Peoples (2007), all indigenous communities have the right to participate and to be consulted before any activities are performed. Furthermore, if the authorities have not performed the appropriate process of free, prior and informed consent (FPIC), CIE Automotive must carry out dialogue with the communities’ representatives in order to reach an agreement, or in any cases where this is not possible, it must provide public information about its decision and the steps taken.
- ✓ **Contributing to the fight against corruption and implementing measures on protection of privacy**

CIE Automotive rejects all forms of corruption and has procedures and tools in place to ensure that its activities will not directly or indirectly encourage or reward corruption. This is done in accordance with its Code of Professional Conduct and its Anti-Corruption and Anti-Fraud Policy. In addition, CIE Automotive must ensure that the right to personal data privacy is respected for all persons connected with the Group.

4. Compliance with this Policy and its commitments

CIE Automotive must make this Policy publicly available, so that its various stakeholders will be aware of its contents and can assess its level of compliance.

The following elements must be emphasised with regard to this Policy’s implementation, and monitoring of compliance with it:

4.1 Alignment with the Code of Professional Conduct

Compliance with CIE Automotive’s Code of Professional Conduct is compulsory for all Employees at all of the companies belonging to CIE Automotive, with no exceptions.

The guiding values that underlie all of CIE Automotive’s activities are fully in line with the commitments that the Group has taken on in compliance with this Policy, with the following as highlights:

- ✓ Respect for all people in relation to their capacity for initiative, creativity, and innovation, and respect for their participation and teamwork.
- ✓ Personal responsibility, integrity, and commitment to a job well done.

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4.2 Reporting of non-compliances

All of CIE Automotive’s employees have an obligation to report any potential non-compliances they become aware of in relation to the commitments described in this Policy, as well as any related to the rest of the guidelines and rules of conduct established in the Code of Professional Conduct. They must also be allowed to perform that reporting anonymously if desired. All communications received must be treated as strictly confidential, with safeguards against retaliation for all persons who perform reporting in good faith. That reporting may also be performed by anyone who observes any such potentially improper practices, even if they are not one of the Group’s employees.

The company makes a fully confidential Ethical Channel available to facilitate reporting of irregular conduct or activities, and that channel can also be used by anyone from the Group to ask questions about any form of potentially improper conduct.

The functioning of the Ethical Channel is managed by the Compliance Body, and all reporting received via that channel is analysed in compliance with the Ethical Channel Regulation.

Once the communications received have been duly analysed, the Audit and Compliance Committee is notified about them.

4.3. Commitment

CIE Automotive expects all Employees to demonstrate a high level of commitment to compliance with this Policy. Any non-compliances may result in application of the corresponding disciplinary measures in cases where applicable.

In addition, CIE Automotive must include respect for human rights when assessing investment projects and analysing social and environmental impacts. It must also take that subject into consideration during its due diligence processes prior to formalising collaboration agreements, by evaluating the human rights policies and practices of its counterparties.

5. Terms and definitions

For purposes of this document, the following terms and definitions will apply:

- Employees: Members of the Board and all of CIE Automotive’s personnel and collaborators, regardless of the type of relationship or contract they have.
- Stakeholder: all persons or organisations that can affect, be affected by, or be perceived as being affected by, a decision or activity. For CIE Automotive, the stakeholders are the following: shareholders, staff, clients, suppliers, financiers, public-sector bodies, the industry, analysts and investors, and the community.
- Compliance Body: persons from the Compliance Department with responsibility and authority for operation of the Compliance Management System.

6. Oversight and review

On an annual basis, CIE Automotive must report on the steps it has taken for implementing this Policy.

In addition, this Policy’s contents must be reviewed with the periodicity determined by the Board of Directors and the Environmental, Social, and Governance (ESG) Committee, to ensure that CIE Automotive is always applying best practices in relation to the subjects addressed.

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