



**HUMAN RIGHTS POLICY  
(POL-ESG-003)**

**AUDAX RENOVABLES, S.A.  
AND ITS GROUP OF COMPANIES.**

Key Document Data	
<b>Policy Code</b>	POL-ESG-003- Human Rights Policy
<b>Scope: Global/Local</b>	Global
<b>Related policies</b>	POL-ESG-002-Sustainability Policy Code of Ethics
<b>Business Units concerned</b>	All those of the Audax Group
<b>Personnel concerned</b>	All Employees of the Audax Group
<b>Responsible</b>	Sustainability Department

Responsibility	Name	Date of signature
<b>Author</b>	Sustainability Department	17/12/2025
<b>Policy manager</b>	Sustainability Department	17/12/2025
<b>Approvals</b>	Board of Directors	17/12/2025
	Audit Committee	17/12/2025
	General Management	17/12/2025

## TABLE OF CONTENTS

1. INTRODUCTION.....	4
2. OBJECTIVES .....	4
3. SCOPE.....	4
4. REGULATORY FRAMEWORK.....	5
5. RESPONSIBILITIES .....	5
6. OUR COMMITMENTS .....	6
7. NON-COMPLIANCE AND DISCIPLINARY RULES.....	9
8. APPROVAL, IMPLEMENTATION AND DISSEMINATION.....	9
9. CHANGE TRACKING .....	10
APPENDIX I - DEFINITIONS AND KEY TERMS .....	11

## 1. INTRODUCTION

This Human Rights Policy (hereinafter, the “Policy”) has been designed to formalise the commitment of Audax Renovables, S.A. (hereinafter, “Audax” or the “Group” or the “company”) to respect and protect human rights. The Policy defines the principles of action for the management of these rights and provides a reference framework for the tasks of identifying, preventing, mitigating and addressing the impacts related to the ethical conduct, equal treatment, non-discrimination and decent work.

Moreover, it is aligned with the Sustainability Policy, thus reinforcing Audax’s commitment to integrated and responsible management.

## 2. OBJECTIVES

The principal aim of this Policy is to guarantee respect for human rights in all the activities of the Group, fostering a safe, inclusive and equitable work environment, as well as ethical and responsible relationships with all its stakeholders.

The Policy has been designed to integrate the principles of equality, diversity, non-discrimination, decent work and responsible governance in the company’s management model, ensuring that all its operations are carried out in a way that is transparent and respectful towards the individuals and communities among which it operates.

In order to meet this purpose, clear objectives have been established within the strategic framework of the Group, which include prevention and mitigation of negative impacts on human right in the value chain, fostering participation and welfare of the employees, guaranteeing fair and safe working conditions, and promoting social responsibility in cooperation with the suppliers, clients and local communities.

## 3. SCOPE

This Policy is mandatory for the directors, managers and employees of Audax or of the company (hereinafter, collectively referred to as the personnel). On the same terms, the Policy is applicable to all the companies of the Group.

Audax shall promote among the cooperating companies, even if they do not belong to the Group, an alignment with the basic principles of respect and protection of human rights in accordance with this Policy.

#### 4. REGULATORY FRAMEWORK

The regulatory framework for this Policy is based on strict compliance with the legislation and regulations on human rights, labour and social matters applicable in all the countries where the company operates, including international, national, regional and local frameworks.

Moreover, it is governed by internal corporate policies and recognised international standards, such as the UN Guiding Principles on Business and Human Rights, the International Labour Organisation (ILO) Core Conventions and the OECD Guidelines for Multinational Enterprises, as well as other commitments made by the company. All the above shall guarantee an alignment with the best practices of respect for human rights, decent work and responsible governance.

#### 5. RESPONSIBILITIES

Adopting the principles established in various regulations and recommendations, which define the regulatory framework of this document, the Human Rights Policy assigns in a clear way the responsibilities concerning the management and supervision of the risks related with this matter within the Group, differentiating between the levels of responsibility and supervision.

- **Board of Directors and Audit Committee:**

The ultimate responsibility concerning the approval of and compliance with this Policy rests with the Board of Directors, which strives to ensure its appropriate integration in the strategy and global management of the Group, guaranteeing that the principles of respect and protection of human rights are aligned with the corporate goals, and monitoring potential impacts and risks, which may affect the company.

The Audit Committee, a delegated committee of the Board of Directors, undertakes to monitor the appropriate implementation of the policies, procedures and protocols related to these matters, and to ensure their effective application in practice.

- **General Management:**

The General Management is responsible for ensuring appropriate implementation, supervision of, and adherence to the Human Rights Policy, guaranteeing that the undertaken commitments translate into real actions and business practices that are aligned with the Group's principles.

- **Sustainability Department:**

Within this framework, the Sustainability Department assumes the operational responsibility for the Policy. Its main duties are the following:

- To keep the Policy up to date with the regulations, business model and current situation in the sector.

- To ensure the integration of the commitments to human rights in the corporate strategy and in the Group's action plans.
- To prepare annually the Sustainability Statement or the Non-Financial Information Statement, where the company's performance concerning these matters is reported through the quantitative and qualitative indicators.
- To support the identification and management of human rights-related risks and to advise business areas on implementing the initiatives aligned with the principles of the Policy.

- **Human Resources Department:**

The Human Resources Department is responsible for coordinating the deployment of the Policy in different subsidiaries and areas of the Group. It shall likewise promote a culture of respect for human rights in the policies and processes of staff and collaboration management, as well as support prevention and solution of possible infringements.

- **Compliance Area:**

The Compliance Area shall oversee the regulatory compliance and monitor the risks related to human rights, ensuring that the internal policies and controls are effective and reporting possible infringement to the Management and the Board of Directors.

- **All employees:**

In general, all the employees, without distinction of hierarchy or function, shall be acquainted with, respect and apply the principles of this Policy in the performance of their professional activities.

- **Partners, contractors and suppliers:**

The company shall encourage its business partners, contractors and suppliers to adhere to the defined commitments, contributing to an ethical and responsible value chain, coherent with the values of the company.

## 6. OUR COMMITMENTS

Audax maintains a firm commitment to the respect for fundamental rights, integrating in its management model the principles of equality, diversity, non-discrimination, harassment prevention, health and safety in the workplace, privacy and individual well-being.

Its actions are based on the guiding principles focused on prevention and remediation of human rights-related impacts, regulatory compliance, continuous improvement and transparency.

The specific commitments made in the principal areas of action in these matters are

outlined below:

### **GENERAL COMMITMENTS**

- To carry out the Group's activities in compliance with the national and international legislation, local legal frameworks and the main international standards of human rights, labour rights, decent work and good corporate governance, including the principles of the Code of Ethics when there is a clear standard that regulates an action or decision, and the contractual commitments with third parties. These activities are governed by the principles of respect of the freedom of association and the right to collective bargaining, elimination of all kinds of forced labour or child labour, the guarantee of equal opportunities, non-discrimination in employment, fostering the awareness of these principles and their application among its employees and collaborators.
- To maintain contractual, commercial and administrative relations based on the principles of ethics, integrity and transparency, guaranteeing responsible actions, which are respectful of individual rights.
- To ensure that all the relations and operations are carried out in a professional, honest, impartial and transparent way, avoiding conflicts of interests and preserving professional independence.
- To maintain and promote a safe and healthy work environment, reinforcing a preventive culture based on the responsible management of occupational risks, legal compliance and continuous improvement of all the operations. This commitment extends to all the subsidiaries through management systems, prevention and self-protection plans and safety guidelines for the employees in the workplace and in teleworking, providing continuous training and participation of the employees in order to support their physical and emotional integrity.

### **COMMITMENTS TO OWN WORKFORCE**

The employees are the foundation of the company's growth and success. Therefore, the Group fosters and strives to maintain working environments based on respect, equal opportunities and fulfilment of human rights. Audax promotes a safe, inclusive and egalitarian environment, which fosters diversity, wellbeing and participation of all the people.

Consequently, it assumes the following commitments in order to protect individual dignity, integrity and professional development:

- To guarantee non-discrimination, providing an inclusive working environment, which is respectful, free from any form of discrimination based on gender, racial or ethnic origin, nationality, religion, disability, age, sexual orientation or other personal or social circumstances.

- To prevent harassment and gender-based violence, promoting labour relations based on respect, equality and zero tolerance towards any form of harassment, whether sexual or gender-based or of any other kind.
- To promote work-life balance and respect of personal life, recognising the right of the employees to a full personal and family life, implementing measures and programmes, which facilitate work-life balance.
- To guarantee health and safety of the employees, ensuring that all the employees of Audax work in a safe environment through risk prevention, elimination of avoidable dangers and minimisation of those which could not be eliminated, complying with the regulations and internal safety measures.
- To provide training on health and safety in the workplace to the employees in order to prevent possible occupational risks.
- To foster freedom of association, collective bargaining and protection of all individual rights, as well as the possibility to express opinions, suggestions and concerns in an open and secure manner, promoting the dialogue, collaboration and continuous improvement of the working conditions.
- To prioritise employment stability through indefinite-term contracts and fair working conditions in all the places where the company operates, ensuring respect of the labour rights in all its subsidiaries and complying with applicable collective agreements or, in case of lack thereof, offering conditions aligned with the European labour standards.
- To provide safe and confidential mechanisms for the communication of irregularities and infringements of legal and/or internal regulations of Audax, of which one has knowledge or suspicion, guaranteeing the availability of the corporate Whistleblowing channel (as the principal mechanism of the Internal Information System) for the purpose of managing, processing and investigating the cases, ensuring the informant's anonymity and protection against retaliation.
- To guarantee security, confidentiality and appropriate treatment of personal data and sensitive information of the employees, adopting preventive measures to avoid incidents and reporting immediately any possible breach to the appointed responsible persons.

## COMMITMENTS TO OUR STAKEHOLDERS

Audax reaffirms its commitment to act responsibly and respectfully towards all its stakeholders, especially among its suppliers, clients and local communities, integrating human rights in its entire value chain. The Group fosters ethical, transparent and sustainable relationships, based on prevention of impacts and on contribution to the social and environmental development.

With this regard, the company assumes the following commitments:

- To identify, assess and manage in a proactive way all possible negative impacts on the value chain, guaranteeing respect of fair and balanced working conditions.
- To adopt corrective measures in view of possible infringements, including whistleblowing, or revision of business relations when necessary.
- To protect sensitive information and personal data of the suppliers and clients through secure and confidential processing, implementing preventive measures and communicating immediately any incidents to the appointed responsible persons.
- To protect the environment respecting human rights, ensuring that the operations do not affect the health, wellbeing or livelihoods of local communities.
- To foster stable and long-lasting relationships with local communities, respecting their traditions and customs, promoting local economic development and social collaboration.
- To respect the rights of ethnic minorities and indigenous people in all the communities and countries where Audax carries out its activities, promoting an inclusive and equitable environment.

## 7. NON-COMPLIANCE AND DISCIPLINARY RULES

Any case of non-compliance with the regulations established in this Policy shall be considered as infringement according to the Disciplinary Rules and Sanctions of Audax. Consequently, the infringing person shall be subject to the corresponding disciplinary measures, in accordance with the severity of the infringement committed and in compliance with the established rules, always with due respect to the local laws and regulations applicable in the country where any given company of the Group conducts its activity.

In order to prevent or, if applicable, detect any irregular conduct, which may occur within Audax, all the stakeholders have available, through the corporate website, the corporate Whistleblowing Channel (as a principal mechanism of the Internal Information System) in order to report possible non-compliance with the legislation and/or internal regulations of Audax, of which they may have information or suspicion, without prejudice to the use of other external channels required by competent authorities in the countries where Audax operates.

## 8. APPROVAL, IMPLEMENTATION AND DISSEMINATION

This Policy shall come into effect as soon as it is approved by the Board of Directors, after being revised and presented by the Audit Committee. The duty to communicate this Policy lies with the Area of Human Resources of the organisation.

Periodic review and update shall be carried out at least annually.

The Policy shall be distributed and communicated through the corporate internal communication channels (intranet, internal training, newsletters, etc.), ensuring that all the employees and partners within the scope of application of the Policy know its content and the principles to be complied with. It will also be available to the general public through the corporate website.

## 9. CHANGE TRACKING

Version control		
Version	Date	Changes introduced
001	17/12/2025	Initial version

## APPENDIX I - DEFINITIONS AND KEY TERMS

For the purpose of this Policy, the following terms and definitions are applied:

- **Human rights / fundamental rights:** Principles and standards, which protect the dignity of all individuals, including equal treatment, non-discrimination, freedom of association, decent work, health and safety in the workplace, privacy and wellbeing in the workplace.
- **Responsible business management:** Way of directing and operating of an organisation, which integrates ethical, social, environmental and good governance criteria in order to generate sustainable value and minimise negative impact on people and environment.
- **Social responsibility:** Commitment of an organisation to ethical and sustainable management of its impacts, contributing to the wellbeing of people, communities and environment beyond its legal obligations.
- **ILO Fundamental Conventions:** Set of international conventions, which recognise the essential labour rights recognised by the International Labour Organisation, including freedom to form unions, collective bargaining, elimination of child labour, forced labour and employment discrimination.
- **OECD guidelines:** Set of recommendations, which establish standards of responsible business conduct in areas such as human rights, environment, employment, transparency and fight against corruption, aiming to ensure that businesses operate in an ethical and sustainable way in all the countries where they are present.
- **Health and safety in the workplace:** Set of actions and conditions meant to protect and foster physical, mental and social wellbeing of the individuals in the workplace, ensuring that work-related activities are performed in a safe, healthy and adequate manner.
- **Decent work:** Working conditions which guarantee productive, safe and decent employment opportunities, respectful of labour rights, equal opportunities, social protection and with wages adequate for a decent life.
- **Local communities:** Groups of people who live and work in the areas where a company operates or has influence, and which may be positively or negatively affected by its decisions and activities.
- **Internal Information System (IIS):** is the preferred channel to be established by public and private entities so that any person may report any infringement committed in the work-related or professional context, guaranteeing confidentiality of the reporting person, protection against retaliation, diligent processing of claims and independence from the body responsible for the system.

## ***DISCLAIMER***

*This document has been drafted for the purpose of instructing the personnel and is applicable to all employees. This document shall be treated with the utmost confidentiality and any disclosure or distribution thereof to third parties without due authorisation of the Company Management is strictly prohibited. Any case of infringement of this document shall be reported to the corresponding area as soon as possible.*