



## **POLICY OF RESPECT FOR HUMAN RIGHTS**

(Text approved by resolution of the Board of Directors of 17 December 2020)

*(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails)*

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Index

<b>1. PURPOSE AND SCOPE OF APPLICATION .....</b>	<b>3</b>
<b>1.1. Purpose .....</b>	<b>3</b>
<b>1.2. Scope of application.....</b>	<b>3</b>
<b>2. PRINCIPLES AND BASIC COMMITMENTS .....</b>	<b>3</b>
<b>3. IMPLEMENTATION AND COMPLIANCE .....</b>	<b>6</b>
<b>3.1. Implementation .....</b>	<b>6</b>
<b>3.2. Dialogue and communication. ....</b>	<b>6</b>
<b>3.3. Monitoring and oversight .....</b>	<b>7</b>
<b>4. APPROVAL AND VALIDITY .....</b>	<b>7</b>

## POLICY OF RESPECT FOR HUMAN RIGHTS

### 1. PURPOSE AND SCOPE OF APPLICATION

#### 1.1. Purpose

The first principle of the United Nations Global Compact, of which Viscofan S.A. (the "Company") has been a signatory since the year 2015, establishes the companies should support and observe protection of internationally recognised fundamental human rights within its sphere of influence.

The activity of VISCOFAN, S.A. ("Viscofan" or the "Company") and of all the companies in the group whose parent company, within the meaning of the law, is the Company (Viscofan Group) is carried out with absolute respect for the human and labour rights recognised in national and international legislation and, in particular, for the principles on which they are based.

Therefore, the Board of Directors, within the framework of the General Sustainability Policy, approves the Policy of Respect for Human Rights (the "Policy") in order to formalise its basic commitment to this principle and to set out the basis for action and development of the Policy.

#### 1.2. Scope of application

This Policy shall apply to the Company and its Group, and shall be mandatory for all its personnel, regardless of their position and function.

The Company will foster the application of the principles and bases of the Policy with any natural and/or legal person linked to Viscofan by a relationship other than an employment relationship where it is possible and appropriate for them to follow principles and guidelines consistent with those set out in this Policy and other sustainable development policies.

In accordance with the Policy, VISCOFAN may develop procedures and instructions to implement and comply with the obligations it has undertaken, or to adapt the Policy to the various local laws applicable to the Group.

### 2. PRINCIPLES AND BASIC COMMITMENTS

This Policy adopts the basic principles of respect for internationally recognised human rights, which are mainly contained in:

- The 10 principles of the United Nations Global Compact,
- The European Human Rights Convention.

- The United Nations Convention on the Rights of the Child.
- the Guiding Principles on Business and Human Rights: implementation of the United Nations framework to "protect, respect and remedy".
- The OECD Guidelines for Multinational Enterprises.
- The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- The Social Policy of the International Labour Organisation, as well as documents or texts that may replace or supplement the aforementioned ones.

Based on the international principles indicated above, the Company's actions in this area of respect for human rights will be carried out in accordance with the following basic principles of action and with the following commitments:

a) Identify, within the risk control systems, the potential impacts on human rights that the Group's activities may generate, develop mechanisms to prevent and mitigate such risks and, ultimately, repair the impacts should they materialise.

b) Periodically evaluate the effectiveness of the monitoring indicators, with a special focus on those centres of activity where there could be a greater risk of human rights violations.

c) Promote a culture of respect for human rights and awareness of staff in this area in all the Group's companies.

d) Have mechanisms for complaints and claims to deal with potential cases of human rights violations. These mechanisms must be sufficiently communicated, both to the Group's professionals and to people and organisations outside the Group.

e) Adopt the appropriate measures in the event of detecting a violation of human rights at the Group's facilities or those of its suppliers, and inform the competent public authorities so that they may take the appropriate action when such violation may constitute an administrative or criminal offence.

f) Promote respect for human rights in all its business relations and the adherence of its contractors, suppliers and business partners to the same principles, paying particular attention to conflict and high-risk situations and in any case ensuring that subcontractors working on the Group's premises must comply with this Policy.

In particular, based on the Group's strategic priorities, the following basic commitments are made:

a) Prohibition of forced labour.

Viscofan opposes forced or compulsory labour. No forced labour of any kind, including bonded labour, debt bondage, forced labour in penal institutions, slavery or trafficking in human beings, shall be permitted, participated in or benefited from. All employment is considered voluntary, and workers are free to leave work at any time or to terminate their employment.

b) Prohibition of child labour

Viscofan opposes the use of child labour. The Company will not permit, practice or support the use of child labour. The term "child" refers to any person: (a) under the age of 15 years, (b) below the minimum age for completion of compulsory education, or (c) below the minimum age for employment in the country, whichever is higher.

c) Elimination of Discrimination in the Workplace.

Viscofan will not permit, practice or support any discrimination based on race, colour, age, sex, nationality, sexual orientation, ethnic origin, disability, illness, pregnancy, belief, political affiliation, union membership or marital status in contracts, remuneration and in employment-related practices such as promotions, bonuses, access to training, dismissal or retirement.

d) Respect for freedom of association and collective bargaining

Viscofan will remain strictly neutral with regard to the preferences of workers and will respect the rights of workers to associate freely, to join or not to join trade unions, to seek representation, to join workers' organisations in accordance with local legislation and to bargain collectively with the company or its representatives. Where the rights to freedom of association and collective bargaining are restricted by law, appropriate channels shall be designed to ensure their reasonable and independent exercise within the legal framework of the country concerned.

e) Elimination of harassment and violence:

Viscofan will not allow, practice or support acts of physical, verbal, sexual or psychological harassment, abuse or threats in the workplace. To this end, it shall define disciplinary policies and procedures which shall be communicated to all workers and shall take measures to prevent and remedy such acts where appropriate.

f) Compliance of Working Conditions

Viscofan will comply with the laws on working conditions, including maximum legal or agreed working hours, overtime, breaks, leaves and holidays, among others, and will abide by agreements negotiated with employee representatives.

g) Promotion of Occupational Health and Safety

Viscofan is committed to working towards the goal of zero accidents and general well-being in the working environment. To fulfil this principle, it is supported by the Occupational Health and Safety Policy and its implementation in appropriate health and safety guidelines, protocols and procedures.

h) Environmental protection

Viscofan is committed to the preservation of the environment. The Company, within the framework of the Environmental Policy, will carry out a continuous improvement of the management systems and processes to maintain the right to a risk-free, clean, healthy and sustainable environment, to prevent pollution and to guarantee the minimisation of the environmental impact of its operations, products and services throughout their life cycle. It relies on appropriate environmental policies and procedures to fulfil this principle.

### **3. IMPLEMENTATION AND COMPLIANCE**

#### **3.1. Implementation**

The Policy is supplemented by other internal documents to which it is linked, mainly:

- The Code of Conduct.
- The Anti-Corruption Policy.
- The Occupational Health and Safety Policy.
- The Environmental Policy
- The Anti-Climate Change Policy.
- The Diversity and Equal Opportunity Policy.
- The Ethics and Compliance Manual
- The Crime Prevention Policy.

In accordance with the Policy, Viscofan may develop procedures and instructions to implement and comply with the obligations it has undertaken, or to adapt the Policy to the various local laws applicable to the Group. The application of this Policy of Respect for Human Rights is consolidated with the appropriate model, policies, regulations and operating procedures in the areas of Human Resources management, Procurement, Environment, Occupational Health and Safety, Risk Control and Ethics and Compliance, and is aligned with the Viscofan Group's sustainability policies as well as the Code of Conduct.

#### **3.2. Dialogue and communication.**

Transparency and dialogue is a fundamental principle that inspires the Company's actions and to this end it will strengthen the channels of communication and relationship with the different stakeholders that interact with the Group, so that it can meet their needs and expectations and favour the creation of shared value.

Likewise, accountability to the different stakeholders will be ensured by issuing relevant, true, complete, reliable and rigorous information, which will allow for the monitoring of the commitments made in human rights. To this end, the Company will prepare and publish relevant information on sustainability issues annually in the management report or in a specific document on this subject.

In addition, the Company's corporate website will be a fundamental instrument for communication with different stakeholders, which can be supplemented by direct relations by the personnel designated for this purpose, and in particular through the media, and relations with shareholders where appropriate.

### **3.3. Monitoring and oversight**

Monitoring of the Policy is the responsibility of the Board of Directors, which will exercise it through the oversight by the Appointments, Remuneration and Sustainability Committee of the development and implementation of sustainability policies and strategies and by the Audit Committee in terms of the integrity of the non-financial information included in the management report, as well as in the supervision of non-financial risks arising from the Group's actions in relation to the Policy.

Likewise, the Group has a Sustainability Committee whose tasks include promoting sustainability plans and programmes in the implementation of policies and an Ethics and Compliance Committee reporting to the Audit Committee which, in addition to ensuring compliance with the Code of Conduct, manages the channel for reporting any offences by employees and other people related to the Company.

## **4. APPROVAL AND VALIDITY**

This Policy, following a report of the Appointments, Remuneration and Sustainability Committee, was approved by the Viscofan Board of Directors at its meeting on 17 December 2020 and came into force upon its approval.

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