

# HUMAN RIGHTS COMMITMENT AND STATEMENT



***Ingeteam***

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# 01 PURPOSE AND COMMITMENT

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This document sets out the commitment of Ingeteam and its Board of Directors to Human Rights and to fair working conditions, an aspect included in its Code of Conduct and which Ingeteam aims to build on through this document.

All Ingeteam's business activities are based on respect for Human Rights and a commitment to comply with the principles established in the United Nations Global Compact, as well as those set out in the Conventions of the International Labor Organization and its Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, and the OECD Guidelines and recommendations for multinational enterprises. Also with the Declaration, the Sustainable Development Goals (SDGs) approved by the United Nations.

Ingeteam undertakes to perform all its activities in accordance with the legislation in force and with the international recommendations on Human Rights, as summarized below:

- Refusal of the use of child labor and prohibition to purchase any product made with child labor, in line with local legislation and the International Labor Organization.
- Prohibition to use forced or compulsory labor, in subhuman conditions, against their will or under threat of some form of punishment.
- Uphold the right of its employees to freedom of association and collective bargaining.
- Offer fair conditions with regard to hiring, remuneration and pay, in line with performance at work, and encourage the reconciliation of work and private life as far as possible.

**Adolfo Rebollo**  
CEO of Ingeteam

## 02 SCOPE

This document is binding on, and applicable to all members of the organization, whatever their position, responsibility, occupation or geographical location. It is also applicable to all the companies forming part of Ingeteam and also, where applicable, to joint ventures, temporary business associations and other equivalent associations, whenever Ingeteam is responsible for the management thereof.

## 03 COMMITMENT TO ACT

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### **In operations and projects**

Work together and in coordination with customers and suppliers in order to ensure that the operations and projects implemented are compliant with Human Rights.

Communicate the outcomes in the implementation of Human Rights actions in the annual public information, available on Ingeteam's website.

Identify the potential risks and negative impacts on Human Rights of the operations and projects in which Ingeteam is involved and draw up action plans directed at mitigating such risks and impacts.

Make a whistleblower channel available, with sufficient guarantees and with suitable resolution procedures to deal with potential cases of the violation of Human Rights. And also, in the event of a violation of human rights, to ensure the timely adoption of appropriate measures and to report the matter to the competent public authorities when this could amount to an administrative, civil or criminal violation

### **Respect for employees**

Scrupulous respect for, and the strengthening of the culture to protect Human Rights among our employees, including non-discrimination, prohibition of child labor, forced labor and modern slavery, freedom of association and the right to participate in collective bargaining.

## **Suppliers and related third parties**

Whenever a risk is identified, perform due diligence in the evaluation and selection of the principal suppliers and third parties, particularly in those geographical areas and/or activities with the greatest risk, as well as monitor performance, where applicable, in order to develop prevention and mitigation mechanisms for the risk in question, as well as to respond to any impacts that may materialize.

Ensure, as far as possible, commitment in the supply chain of Suppliers and third parties with regard to Human Rights and to fair working conditions.

## **Society and local communities**

Participate, as appropriate, in public affairs in a non-partisan and responsible manner in order to promote internationally recognized Human Rights. Participate and make a positive contribution, within Ingeteam's possibilities, to capacity-building in the area of Human Rights, improvement of economic, environmental and social conditions within the local societies and communities in which Ingeteam is operating, while respecting their culture and values.

Promote the implementation of environmental sustainability and development, through our core business activity and also through our participation in other activities with multiple stakeholders, where applicable. Maintain the highest standards of ethics and business integrity and, where appropriate, support the efforts of the national and international authorities to establish and enforce compliance with these standards by all enterprises.

Respect the cultures, customs and values of the people in the communities in which Ingeteam is operating. Help to promote, within our capabilities, compliance with Human Rights through an improvement in the economic, environmental and social conditions and to be a positive influence in the communities in which we are operating.

## 04 STATEMENT ON THE MODERN SLAVERY ACT (UK)

Whenever required to do so by a customer or by any other interested third party, the President of the Ethics and Compliance Committee can issue a statement of compliance with the Modern Slavery Act in force in the United Kingdom, with regard to the following questions:

- Ingeteam complies with the guidelines required by the Modern Slavery Act applicable in the United Kingdom since 2015, and issues the following statement for the financial year (indicate the applicable year) in which it declares its compliance.
- The Board of Directors of Ingeteam, together with its Ethics and Compliance Committee, are spearheading the commitment to Human Rights and to fair working conditions, an aspect included in its Code of Conduct, Suppliers' Code of Conduct and other Ingeteam rules and procedures that ensure compliance. There is also the commitment to compliance with the principles established in the United Nations Global Compact, as well as those set out in the Conventions of the International Labor Organization and its Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, and the OECD Guidelines and recommendations for multinational enterprises. Also with the Declaration, the Sustainable Development Goals (SDGs) adopted by the United Nations.
- All Ingeteam's business activities are based on respect for the Human Rights of our employees and those of the communities in which our businesses operate, considering Human Rights to be a core component of our business activity.
- Any risk of the violation of Human Rights or unfair working conditions that may be identified in either Ingeteam's activities or its supply chain, shall be dealt with immediately in order to either avoid or eradicate this risk, as well as the specific performance of Due Diligence.
- In this respect, all Ingeteam's employees have the necessary training and commitment to foresee and report any violation of Human Rights.
- A whistleblower channel is open to anyone, with sufficient guarantees and with suitable resolution procedures to deal with potential cases of the violation of Human Rights.
- These requirements are also made in the supply chain, requiring Ingeteam's suppliers to undertake the same commitment to Human Rights and to fair working conditions.

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