
Human Rights Policy

Duro Felguera Group





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I. INTRODUCTION

In accordance with its corporate culture, the Group has been strongly committed to human rights and respect for ethical principles throughout its history. This commitment is evident in the beneficial impact of the Group's activities wherever it operates and we believe that it constitutes a vital part of our corporate social responsibility and mission to create value. The fundamental principle that underlies materialisation of this positive impact is the creation of a sustainable business model based, among other aspects, on fostering respect for human rights as a differentiating component that goes beyond mere compliance with legal regulations.

Furthermore, with this Policy the Group aims to lay the foundations on which we can identify, mitigate and prevent detrimental impacts related to respect for human rights in accordance with the provisions of benchmark domestic and international legislation and undertakes to refrain from consciously contributing to any adverse impact on the same.

II. PURPOSE OF THE POLICY

The purpose of this policy is to strengthen and reaffirm our commitment to compliance with human rights regulations and ethical values. Consequently, the Group undertakes the following commitments in this Policy:

- To abstain from directly or indirectly infringing the human rights enshrined in the Universal Declaration of Human Rights either by its own actions or omissions or those of third parties with whom it maintains a relationship of any kind.
- To respect the internationally-recognised human rights in the following documents:
 - the International Covenant on Civil and Political Rights,
 - the International Covenant on Economic, Social and Cultural Rights,
 - the Declaration of Fundamental Principles and Rights at Work and
 - other fundamental conventions of the International Labour Organization and the labour-related principles set forth in the Business Social Compliance Initiative (BSCI) Code of Conduct.
- To observe the OECD Guidelines for Multinational Enterprises and the United Nations Global Compact.










III. SCOPE OF APPLICATION

This policy applies to all activities performed under the auspices of Duro Felguera Group. Therefore, it is of mandatory observance by all Group employees and representatives regardless of the company or country in which they work.

This commitment to human rights acquired by the Duro Felguera Group enhances the development of its relationships with Third Parties. Therefore, Duro Felguera Group expects its related third parties to align with the principles set forth in this Policy.

IV. GENERAL PRINCIPLES OF ACTION

Duro Felguera Group's commitment to human rights is embodied in the following general principles of action:

-  To comply **with the laws and regulations** of the countries in which it performs its activity and, if necessary, to act in a manner that transcends such compliance in order to champion respect for human rights in accordance with international norms and standards. Specifically, the Group is committed to ensuring that its own activities do not cause or contribute to detrimental consequences for the human rights of employees and third parties.
-  To implement mechanisms to ensure compliance with the provisions of the International Labour Organization (ILO) by **fostering fair and equitable working conditions** in the performance of its activities.
-  **To firmly oppose all forms of forced and/or child labour.** In accordance with the foregoing, the Group undertakes not to use this kind of labour in its production processes or to use any service or product that originate in the aforesaid practices.
-  To defend **freedom of affiliation, association and effective recognition of the right to collective bargaining.** Consequently, the Group undertakes to respect its employees' right to join trade unions and associations that defend their interests.
-  To nurture **respect for diversity and non-discrimination.** Therefore, the Group repudiates all forms of discrimination based on age, gender, race, colour, religion, disability, political opinion, marital status, ethnic origin or sexual orientation. Furthermore, it is committed to fostering a working environment in which people are treated and valued fairly and equitably, abjuring all manifestations of physical, psychological or moral harassment or abuse of position of authority and any other denigrating, offensive or intimidating behaviour that infringes people's rights.
-  The Group is committed to **defending occupational health, safety and psychological well-being** in its development environment as an integral part of its responsibility to defend human rights, especially those related to life, health and physical and emotional integrity by providing a safe, healthy, high-quality life for both its employees and all third parties with which it has established relations.
-  To **respect the rights of the communities** in the areas where it operates by fostering respectful, dignified treatment of people, their customs and ways of life.
-  To **protect and conserve the environment** by a commitment to continuously improve the management systems that administer its activities with the aim of mitigating the environmental impact of its operations.
-  Duro Felguera Group does business in line with the principle of **zero tolerance for corruption and fraud**, condemning all manifestations of such crimes and adopting the direct and indirect measures required to prevent and combat them.



This policy is aligned with the Group's Code of Conduct and existing internal policies and standards in labour, social and environment-related matters. In the exercise of its responsibilities, Duro Felguera Group will also require its suppliers and contractors to comply with the standards and principles set forth in this Policy by fostering respect for human rights in the supply chain.

V. DISSEMINATION MECHANISMS

Duro Felguera Group will take the measures required to disseminate and notify all its employees, representatives and related third parties of the goals and content of this Policy. Training and informative activities will be also implemented to make the content known as required. In accordance with the above, the People and Organisation Department will be responsible for the implementation, dissemination and application of the Policy within the Group including the planning, coordination and monitoring of the action required in a variety of areas and departments.

It will be distributed to all stakeholders by publication on the corporate website and Intranet to drive dissemination.

VI. FAILURE TO COMPLY WITH THE POLICY

The Group's employees and representatives have an obligation to report any potential breaches of the commitments set forth in this Policy that they may detect or which are brought to their notice.

The Group provides the following communication channels for these purposes:

- The Ethical Line <https://lineaetica.durofelguera.com>, through which potential breaches can be reported.
- The email address dcn@durofelguera.com, through which any doubts or inquiries arising from the application or interpretation of this Policy can be communicated.

Accordingly, incident reporting and queries shall be governed by the provisions of the Group's Internal Notification, Incident and Investigation Communication Policy.

VII. PUBLICATION AND EFFECTIVE DATE

This Policy was approved by the Board of Directors of Duro Felguera on XX XXXX 202X.

It may be updated and reviewed regularly on proposal by the People and Organisation Department considering suggestions and proposals made by the corporate areas or departments and further commitments by the Group on the issue.