



# **Human Rights Policy**

**JANUARY 2021**

## Document control

Date formulated	Date approved	Versión N°	Description of changes
29th December 2020	29th January 2021	1	Initial version

## 1. Purpose of the Policy

The Board of Directors of Greenergy S.A. ("Greenergy" or the "Company") has been legally vested with the non-delegable duty of determining the Company's corporate policies and strategies. By means of this policy Greenergy commits to support, respect and contribute to the protection of internationally recognized fundamental human rights, and to avoid any abuse or violation among the stakeholders.

## 2. International benchmarks

This Policy adopts the following international and European law treaties:

1. The International Bill of Human Rights of the United Nations (UN).
  - o The Universal Declaration of Human Rights.
  - o The International Covenant on Civil and Political Rights.
  - o The International Covenant on Economic, Social and Cultural Rights.
2. The fundamental conventions of the International Labor Organization (ILO) 29, 87, 98, 100, 105, 111, 138 and 182, as well as the ILO Declaration on fundamental principles and rights at work.
3. The United Nations Convention on the Rights of the Child.
4. The European Convention on Human Rights.

The following business standards and voluntary initiatives are also considered:

1. The principles of the United Nations Global Compact.
2. The Guidelines of the Organization for Economic Cooperation and Development (OECD) for Multinational Enterprises.
3. The ILO Tripartite Declaration of Principles on Multinational Enterprises and Social Policy.
4. The United Nations Guiding Principles on Business and Human Rights.

Greenergy's Code of Ethics, Supplier Code of Ethics and the Crime Prevention Protocol complement and are linked to the principles set forth in this Policy.

### 3. Principles

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#### **RESPECT FOR HUMAN RIGHTS IN THE WORKPLACE**

##### **Rejection of forced labor**

Grenergy rejects forced or compulsory labor, as well as any manifestation of physical, psychological, moral harassment or abuse of authority, or any other conduct that intimidates or offends people's rights. In no case will Grenergy confiscate money or identity documents at the beginning of the employment relationship in order to retain workers against their will.

##### **Prohibition of child labor**

Grenergy rejects, does not practice, or allow the use of child labor in any of its activities, in any region, according to the current legislation of the country in which such activities are carried out and respecting, in any case, the minimum age established at the ILO Convention 138.

##### **Elimination of discrimination at work**

Grenergy does not accept any type of discrimination based on age, race, ethnicity, color, sex, religion, political opinion, national origin, sexual orientation, social origin or disability or any distinction, exclusion or preference that has the effect of nullifying or altering the equal opportunities or treatment in employment.

The participation of women at managerial and intermediate levels and equal opportunities are promoted. The universal accessibility of the facilities is guaranteed to allow the integration of all people.

##### **Defense of freedom of association and collective bargaining**

Grenergy defends the freedom of association and the effective recognition of the right to collective bargaining.

##### **Promotion of Occupational Health and Safety**

Grenergy is committed to promoting a culture of health and safety at work through the necessary prevention tools.

##### **Working conditions**

Grenergy promotes a culture of respect with zero tolerance towards all forms of verbal, physical, sexual or psychological harassment, as well as inhuman or degrading treatment. The laws regarding working conditions are complied with, and fair remuneration is ensured to all the Company's employees, allowing them to live full lives and cover basic needs. Likewise, flexibility and family conciliation of employees are favored, without any Impact or reduction in professional development.

#### **RESPECT FOR HUMAN RIGHTS IN THE FIELD OF THE LOCAL COMMUNITY**

Our commitment to defending human rights also reaches local communities potentially affected by our activity, particularly, the most vulnerable. Grenergy respects their right to access to food, water and sanitation, energy, education, health and housing, clean and healthy environment, as well as the right to freedom of opinion, expression, thought, belief and religion.

## 4. Implementation

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To apply the commitments contained in this document, due diligence processes will be established for their implementation and monitoring in accordance with the ESG roadmap. Greenergy commits to publicly report about severe violations of this policy that might be found.

The Company has a [whistleblowing channel](#) in place aimed at facilitating the reporting by any person, Greenergy employee or not, about any breaches of the principles described in this Policy, in order to implement mechanisms for its repair.

## 5. Public nature of this Policy

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This Policy is public in nature and it and any subsequent revisions will be hosted permanently on Greenergy's website.

## 6. Approval of the Policy by the Board of Directors

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This Policy has been approved by the Board of Directors, and will supervise its implementation.