



# Corporate Human Rights Policy

## Purpose

The purpose of this Corporate Human Rights Policy (hereinafter "the Policy") is to state the commitment and responsibilities of URBASER in relation to human rights, especially those that affect its business activities and the operations carried out by the workers of URBASER, both managers and employees and their subsidiaries.

URBASER promotes respect for human rights in all its labour relations and the adherence of its contractors, suppliers, and partners to the same principles.

URBASER is committed to respecting the human rights recognised in the Declaration of Fundamental Principles and Rights at Work and Conventions of the International Labour Organisation, the United Nations Universal Declaration of Human Rights, and the Principles of the United Nations Global Compact.

URBASER ensures proper risk management from a preventive approach, minimising negative impacts and maximising positive impacts.

## Scope of application

This Policy is applicable to all employees, managers, and members of the governing bodies of URBASER S.A.U., its subsidiaries and holdings/joint ventures in which URBASER is the majority shareholder/partner or where control is held by URBASER's management ("URBASER" or "the Company"). It is the responsibility of all URBASER employees to act professionally and protect the Company's reputation.

URBASER is committed to ensure that all persons and companies related to it, especially customers, partners, suppliers, agents, consultants, and subcontracted companies, comply with the same ethical standards and principles related to this Policy. For this reason, such third parties with whom the Company maintains a contractual relationship shall be informed of the provisions of this Policy as applicable to them.

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URBASER rejects any form of abuse or violation of human rights among its employees, suppliers, contractors, collaborators, and partners, and is committed to upholding the fulfilment and protection of these rights in all its activities and geographical areas where it operates.

Specifically, URBASER requires its suppliers and contractors to respect internationally recognized human rights throughout its supply chain, adopting the necessary measures for their strict compliance as established in the Company's Supplier Code of Ethics.

URBASER assumes and undertakes to promote the following principles that will be applied in all business areas and levels of the Company:

- **Respect for equality and non-discrimination**

URBASER rejects all forms of discrimination and is committed to ensuring that all its employees are treated with respect for their diversity, promoting equal opportunities, whether at the beginning of the employment relationship or at any time during its development. The Company supervises compliance with its Equality Plans, which regulate equality and diversity management practices within the Company.

- **Rejection of forced and child labour**

URBASER rejects any form of forced or compulsory labour, as well as any conduct involving moral or psychological harassment that may go against people's rights, as defined in ILO Convention 29.

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URBASER respects the rights of children and rejects the use of child labour as defined in the legislation applicable in the country in which the company operates and, in any case, respects the minimum age established in the ILO Convention 138. Without prejudice to the foregoing, URBASER does not allow the hiring of workers under fifteen years of age, except in developing countries where the minimum working age is set at 14 years of age. In particular, the minimum age of 18 years shall be respected for those works considered as hazardous.

- **Fair working conditions**

URBASER respects and recognises the right of workers to maintain a dignified, safe, and healthy working environment, rejecting all forms of harassment - whether verbal, physical, sexual, or psychological - threats or intimidation in the workplace.

URBASER takes into consideration the principle of fair payment for work and respects the principle of equal pay for men and women for work of equal value. The minimum remuneration received by URBASER employees shall not be less than the minimum set out in the labour regulations in force in each country, in accordance with the provisions of the ILO Conventions.

- **Freedom of association and collective bargaining**

URBASER respects the right of its employees to form or join organisations or trade unions of their choice. It also recognises the right of workers to be represented by trade unions and other forms of elected representation in accordance with the laws and practices in force in the different countries where the employment relationship takes place. The Company recognises the value of collective bargaining as an instrument for determining the contractual conditions of its employees.

- **Health and safety**

URBASER provides the resources and conditions necessary to foster a culture of safety and health among employees and the citizens it serves, as well as contractors.

The Company supervises compliance with, and proper communication of the requirements and practices described in its Corporate Quality, Health and Safety, Environment and Energy Policy and the documents and standards associated with it, as these regulate health and safety practices and service quality in the Company, always respecting the labour laws of each country and international legal tools.

- **Local and indigenous communities**

URBASER ensures respect for human rights in the communities in which it operates, while respecting local laws, culture, and customs, engaging in open dialogue with stakeholders and paying particular attention to the most vulnerable groups. The Company recognizes the culture and historical value of indigenous peoples and acknowledges their specific rights in the regions and countries where it operates.

## **Training**

URBASER will promote due training for all Company personnel, in accordance with their level of exposure to risk, so that they are aware of their ethical principles and duties derived from the Code of Conduct and this Policy.

## **Doubts, communications, or complaints**

Any employee who has doubts or well-founded suspicions of non-compliance with the provisions of this Policy, the Code of Conduct, or any related procedure, as well as doubts about the application of this Policy, should contact the corresponding Regulatory Compliance Body through the Ethical channel provided on the URBASER website, [www.urbaser.com](http://www.urbaser.com).

The Ethical Channel is a means of reporting non-compliance with the rules contained in this Policy, as well as a means of resolving any doubts that may arise from its application.

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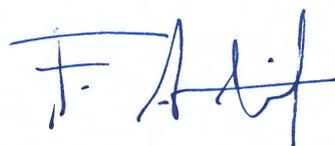
## Non-compliance

Failure to comply with the provisions of this Policy and applicable law may result in serious consequences for the Company, its employees, and officers.

This Policy is a mandatory rule, and therefore its violation will constitute a breach and the Company will adopt the appropriate disciplinary measures, in accordance with labour legislation and the Penalty Procedure contained in the applicable Collective Bargaining Agreement, if applicable, without prejudice to any other responsibilities that the offender may have incurred. Likewise, URBASER will reserve the right to adopt the measures it considers appropriate against the business partners who do not comply with it.

## Review and updating

The Regulatory Compliance Committee shall periodically review the content of this Code of Conduct, ensuring that it reflects the international recommendations and best practices in force at any given time, and shall propose to the Board of Directors the modifications and updates that contribute to its development and continuous improvement.



**Fernando Abril-Martorell Hernández**  
**Chief Executive Officer**

Madrid, 15 July 2022