

**HUMAN RIGHTS POLICY AND RELATIONSHIP WITH THE
COMMUNITIES**

AMPER GROUP

Corporate Policy

Adopted by the Governing Council at its meeting on 31 May of 2023

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1. OBJECTIVE

The objective of this policy is to establish internationally recognized principles related to human rights and of obligatory respect by the Amper Group (hereinafter “AMPER”).

2. SCOPE

This policy applies to all AMPER employees, senior managers and advisers (hereinafter referred to as “Employees”).

3. PRINCIPLES

The rights referred to are those set forth in the International Bill of Human Rights and the principles relating to the rights set out in the Declaration of the International Labour Organization (ILO) on Fundamental Principles and Rights at Work, as well as the eight Fundamental Conventions that develop them.

The term “respect” implies that AMPER will make reasonable efforts to prevent its activities from causing negative impacts on human rights and that, if they occur, it will do its utmost to mitigate or repair the damage.

4. COMMITMENTS

4.1. In accordance with international standards

Proceed in accordance with international reference standards, including non-exhaustive standards, the United Nations Guiding Principles on Business and Human Rights, the guidelines of the Organization for Economic Cooperation and Development (OECD) for Multinational Enterprises and the 10 Principles of the Global Compact.

4.2. According to activities

AMPER undertakes to exercise due diligence in the field of human rights in all its activities. Thus, the potential human rights impacts of activities are identified and evaluated before undertaking a new activity or starting a business relationship and when relevant operational changes occur. It also seeks to integrate the findings of impact assessments into the internal processes of AMPER and to take appropriate measures to prevent and mitigate potential impacts.

4.3. According to commercial relations

Among the objectives of AMPER is due diligence in human rights in establishing any commercial relationship. Reasonable efforts should be made to avoid or mitigate negative impacts on human rights directly related to trade transactions, products or services (including relationships with partners, suppliers, contractors, distributors, etc., as well as any other public or private entity, including public security forces directly related to operations, products or services). AMPER promotes the knowledge and fulfilment of the

commitments of this Policy among those with whom it relates for commercial purposes, waiting for its trading partners to respect human rights in the development of their activities in any part of the world and, consequently, to address the negative impacts in which they have any participation.

4.4. According to Employees

AMPER respects the human rights of its Employees, promoting a culture of respect for human rights among Employees, promoting specific training and implementing tools to prevent these rights from being violated. It also ensures that employees have access to

channels of communication and denunciation that allow them to inform AMPER of situations of possible impact on their rights.

4.5. According to clients

AMPER respect the human rights of its customers, rejecting any discrimination against customers and users of products or services, respecting at all times the right to their privacy, protecting and making correct use of the personal data entrusted by customers and users.

4.6. According to communities

With regard to the communities in the area of influence of projects and assets, AMPER is committed to:

- a) To continue to respect their human rights.
- b) Assessing and understanding the socio-economic environment in which it operates and identify all groups within the communities in their area of influence, especially vulnerable groups.
- c) Recognize and respect the unique identity and nature of communities; their cultural diversity; their different aspirations and needs; and the right to maintain their customs and social practices.
- d) Establish strong relationships with the communities in the area of influence of their projects and assets, based on the principles of respect, cultural sensitivity, integrity, accountability, transparency, good faith and non-discrimination.
- e) Promote proactive and transparent dialogue with communities in an honest and culturally appropriate manner, at all stages of the project life cycle and active on the basis of listening and open exchange of information.
- f) Establish effective complaint mechanisms from the outset of operations to ensure that potentially affected persons and rights holders (including employees, suppliers, contractors, communities, and other third parties) can report any human rights impacts to AMPER. These mechanisms should not impede access to judicial or other existing extrajudicial channels, nor should they hinder the legitimate and peaceful activities of human rights defenders.

- g) Identify opportunities to optimize the positive impacts of the activity and promote the shared value and sustainable development of communities through the contribution to local socio-economic development and the preservation of the environment in the areas of influence of projects and assets.
- h) Efforts to obtain and maintain community support in the areas of project influence and assets in a manner that is appropriate and respectful of local usages, customs and culture.
- i) Recognize and respect the unique nature of indigenous, tribal, aboriginal and indigenous peoples. To recognize and respect their rights, in accordance with existing legislation and ILO Convention 169, whether or not they are incorporated into the legislation of each country. This includes, inter alia, the rights to land, territories and resources, including water, to their organization, to their social and economic structure and to free, prior and informed consultation, through appropriate procedures and in particular through their representative institutions, whenever legislative or administrative measures are envisaged that may directly affect them in good faith and in a manner appropriate to the circumstances, with the aim of seeking understanding or helping to reach consent to the proposed mitigation measures.

5. INVOLVEMENT

Employees who fail to comply with this Policy shall have the appropriate disciplinary measures, which may range from reprimands to termination of the contract, depending on the specific case. The determination of seriousness and corresponding sanction shall be determined by the Directorate of Compliance and evaluated by the Directorate of Internal Audit, in collaboration with the Directorate of Human Resources.

6. MATRIX OF RESPONSIBILITIES

ROL	ALLOCATION
Responsible	The determination of gravity and corresponding penalty for non-compliance with this Policy shall be determined by the Directorate of Compliance.
Approver	The Internal Audit Authority, in collaboration with the Human Resources Directorate, will evaluate the determination of seriousness and corresponding sanction for non-compliance with this Policy by the Regulatory Compliance Directorate.