

HUMAN RIGHTS

Corporate policy



aSTara

TRACK CHANGES



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Sections that change	Content
Description of the change	The compliance commitment for Astara to comply with the principles of the International Labour Organization's (ILO),
Classification	

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1. PURPOSE

The purpose of this Corporate Human Rights Policy (hereinafter “the Policy”) is to formalise Astara’s commitment and responsibilities with respect to human rights as recognised by national and international law, in particular as they relate to its business activity and the operations carried out by the employees of astara and its subsidiaries.

Astara promotes respect for human rights in all its working relationships and encourages its contractors, suppliers and partners to adhere to the same principles.

Astara is committed to respecting the human rights recognised in the Declaration of Fundamental Principles and Rights at Work and the Conventions of the International Labour Organisation, the Universal Declaration of Human Rights of the United Nations and the principles of the United Nations Global Compact, as well as the documents and texts that may replace or supplement them.

Astara ensures adequate risk management from a preventive approach, minimising negative impacts and maximising positive impacts.

2. DEFINITIONS

- I. **Astara, Group, or Astara Group:** includes Astara Mobility, S.A., and all its Affiliates, and branches.
- II. **Astara’s Personnel:** meaning all directors and officers, employees, consultants working within Astara and workers working at any Astara business anywhere in the world.
- III. **Board of Directors or Governing Body:** the body or set of governing bodies of a company that is responsible for the supervision and management of the business at the highest level and for the implementation of the Information Management System and the Channel (hereinafter “**Information Management System**”).

3. SCOPE OF APPLICATION

This Policy applies to Astara Group and Astara’s Personnel.

Astara intends that all persons and companies associated with it, in particular its customers, partners, suppliers, agents, consultants and subcontractors, adhere to the same ethical standards and principles in relation to this Policy.

4. CONTENT

Astara rejects any form of abuse or violation of human rights among its employees, suppliers, contractors, collaborators and partners, and is committed to respecting and protecting these rights in all its activities and geographical areas of presence. In particular, Astara requires its suppliers and contractors to respect internationally recognised human rights throughout their supply chain and to take necessary measures to ensure strict compliance.

Astara adopts and is committed to promoting the following principles, which will be applied in all areas and at all levels of the Company.

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

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

- **Rejection of forced labour and child labour**

Astara rejects any form of forced or compulsory labour, as well as any conduct involving moral or psychological harassment that may be contrary to the rights of individuals, as defined in ILO Convention 29. Astara does not tolerate any form of modern slavery or human trafficking in its organisation or in its supply chain and plays an active role in promoting and respecting Human Rights.

Astara respects the rights of the child population and rejects the use of child labour, as defined in the legislation in force in the country where the relevant activities are carried out, and in any case respecting the minimum age established in ILO Convention 138. Notwithstanding the foregoing, Astara does not permit the employment of persons under the age of fifteen, except in developing countries where the minimum working age is set at 14. In particular, the minimum age for work considered hazardous shall not be less than 18 years of age.

- **Fair and favourable working conditions**

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

Astara is committed to the principle of fair pay for work and respects the principle of equal pay for men and women for work of equal value. The minimum remuneration of Astara's employees shall not be less than the minimum set by the labour legislation in force in each country, in accordance with the provisions of the ILO Conventions.

Astara is committed to comply with the principles of the International Labour Organization's (ILO), related conventions and applicable local law, on working time, to provide the framework for regulated hours of work, daily and weekly rest periods, and annual holidays. These instruments ensure high productivity while safeguarding workers' physical and mental health.

- **Freedom of association and collective bargaining**

Astara respects the right of its employees to form or join organisations or unions of their choice. It also recognises the right of employees to be represented by trade unions and other forms of elected representation in accordance with the laws and practices in force in the various countries where the employment relationship is carried out. The Company recognises the value of collective bargaining as a means of determining the terms and conditions of employment of its employees.

- **Health and Safety**

Astara provides the resources and conditions necessary to promote a culture of health and safety among its employees, the communities it serves and its contractors.

5. DOUBTS, COMMUNICATIONS OR COMPLAINTS

Any employee who has doubts or reasonable suspicion of non-compliance with the provisions of this Policy, the Code of Ethics or any related procedures, as well as doubts about the application of this Policy, should contact the relevant Compliance Committee through the Ethics Channel provided on the Astara website, www.astara.com.

The Ethics 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.

6. VIOLATIONS

Failure to comply with this Policy may result in labour sanctions, without prejudice to any administrative or criminal sanctions that may also be imposed in accordance with applicable labour legislation. Failure to comply with the provisions of this Policy and applicable law may have serious consequences for the Company, its employees and management.

This Policy is considered a mandatory rule and therefore its violation will constitute a breach of this Policy and the Company will take the appropriate disciplinary measures in accordance with labour legislation and the penalty procedure contained in the applicable collective bargaining agreement, if any, without prejudice to any other responsibilities that the offender may have incurred.

Similarly, Astara reserves the right to take whatever action it deems appropriate against its business partners who violate it.

7. REVIEW AND UPDATE

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

8. APPROVAL

This policy has been approved by the Board of Directors of ASTARA MOBILITY S.A. on 23 January 2023, and is effective from the time of its approval.

9. REFERENCES

- Ethics Code
- Convention 29 of the International Labour Organisation
- Convention 138 of the International Labour Organisation
- The United Nations Universal Declaration of Human Rights
- Principles of the United Nations Global Compact

