



RESPECT FOR HUMAN RIGHTS POLICY

January 2024

1. Preliminary considerations

1.1 Introduction and purpose

The companies that make up the Simon Group (hereinafter collectively referred to as "Simon Group" or "the Company") are aware of the importance of avoiding any risk and harm that their business activities could generate regarding Human Rights.

Human Rights risks generally affect entities that, like Simon Group, engage in international relations with third parties and have supply chains, operate in sectors that are sensitive to Human Rights or undertake actions with a direct or indirect impact on certain groups (customers, employees, etc.).

To this end, in order to ensure respect for Human Rights in the course of its activities, Simon Group has established this Policy.

The purpose of the Policy is to define:

- The commitments that the Company undertakes to protect Human Rights;
- The principles that must govern all its actions;
- The monitoring mechanisms that Simon Group establishes to ensure compliance.

1.2 Commitments undertaken to Respect Human Rights

Simon Group is aware of the impact that the Company's activities may have on the natural rights of certain groups. It therefore assumes responsibility for observing, respecting, promoting and protecting Human Rights.

Specifically, Simon Group undertakes the following commitments:

- Ensure compliance with international regulations regarding respect for Human Rights¹, without prejudice to compliance with national regulations on the matter.
- Act at all times in accordance with the principle of due diligence in its operations and decision-making, in accordance with the provisions of the United Nations Guiding Principles on Business and Human Rights.
- Establish the necessary mechanisms to remedy specific human rights violations that may arise from the Company's activities.

1.3 Scope of application

This Policy shall apply to all Simon Group employees and activities.

2. Principles and guidelines for action

In accordance with the United Nations Guiding Principles on Business and Human Rights, the responsibility to respect human rights requires that business enterprises:

- Avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur.
- Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts (e.g. in relationships with suppliers).

For these purposes, as well as to ensure compliance with Simon Group's commitments to respect Human Rights, the Company's activities will be governed at all times by the following principles and guidelines for action:

¹ These mainly includes the provisions established in the International Bill of Human Rights (Universal Declaration of Human Rights and other covenants that followed it), the European Convention on Human Rights, as well as the International Labour Organization Declaration on Fundamental Principles and Rights at Work

2.1 Principles of respect for Human Rights at work

During the course of its activities, Simon Group follows the principles established in the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

In this regard, the Company upholds the freedom of association and the right to join a union, as well as the right to collective bargaining, promotes the elimination of all forms of forced or compulsory labour, including the effective abolition of child labour, promotes the elimination of discrimination in matters of employment, and ensures at all times that Simon Group employees enjoy a safe and healthy working environment.

Promoting decent, fair and favourable working conditions

Simon Group guarantees decent, fair and favourable working conditions for all its employees. To achieve this, the Company respects the right to rest, leisure, and family life, reinforcing practices that promote a healthy work-life balance.

Furthermore, as stated above, Simon Group respects the freedom of association, the right to join a trade union and the right to collective bargaining of all its employees, in accordance with the applicable regulations in this matter.

Salaries and benefits

Simon Group ensures that the salary and benefits of its employees comply with the requirements of the applicable laws and regulations.

In addition, all employees of the Company are compensated competitively and fairly.

Prohibition of forced labour

Simon Group does not tolerate any form of forced labour or child exploitation, neither in the various companies that make up the Group nor in the various entities that make up its supply chains or with which it is otherwise involved.

Failure to comply with this Policy may result in penalties in accordance with **Simon Group's** disciplinary system.

To this end, Simon Group carries out the due diligence activities set forth in section 3.1 of this Policy to ensure that the third parties with whom it interacts comply in particular with this principle, among others.

Prohibition of discrimination

Simon Group will not tolerate any form of discriminatory treatment based on birth, race, sex, religion, or any other personal or social condition or circumstance, both among the employees of the Company and with respect to third parties (such as customers, suppliers, among others).

Specifically, the selection and promotion processes for Simon Group employees will be based exclusively on criteria based on merit and capabilities, and the principle of equal opportunity will apply to all those who participate in them.

Safe and healthy working environment

Simon Group's commitment to protecting the right to health begins with its own employees. Therefore, the Company promotes a safe and healthy working environment by providing training to its employees on occupational health and safety, and supplying them at all times with the necessary tools to carry out their work safely.

The Simon Group scrupulously respects the applicable regulations on occupational risk prevention in all the locations where it carries out its activities, and urges the third parties with whom it interacts to respect and strictly comply with these regulations.

2.2 Principles of respect for Human Rights in interactions with communities and society

The Simon Group's commitment to protecting Human Rights also extends to other supra-individual values considered fundamental for life in society.

In this way, the Company adopts measures to minimize the impact of its activity on the environment and on any other Human Rights recognized internationally.

Failure to comply with this Policy may result in penalties in accordance with **Simon Group's** disciplinary system.

Environmental protection

Simon Group is fully aware of the importance of caring for the environment, both for society and for the Company's own activities. To this end, the development of the business is reconciled with respect for the environment, in strict compliance with the best practices in this area.

The Company is committed to the continuous improvement of its processes, minimizing the environmental impact of its operations and encouraging third parties with whom it interacts to adhere to this commitment.

Protection of the rights of the communities with which Simon Group interacts

In the development of its activities, and especially in interactions with certain communities that may be considered particularly vulnerable, Simon Group seeks to avoid the violation of any other Human Right recognized by international regulations in the area.

Use of private or public security forces

Simon Group may only resort to the use of force when strictly necessary and exceptionally, solely to the extent that a particular issue requires it.

Nevertheless, the Company guarantees that, when other means are ineffective, the use of force will not be excessive, arbitrary, abusive or unlawful, thus respecting Human Rights and the safety of individuals.

3. Monitoring, control and response measures

In order to ensure respect for Human Rights and that the Company's actions are governed by the above principles and guidelines, Simon Group establishes operational measures that aim to:

- Identify, prevent, mitigate and be accountable for the impact of the Company's activities on Human Rights.
- Remedy any adverse impact on Human Rights that Simon Group may have caused or contributed to causing.

Failure to comply with this Policy may result in penalties in accordance with **Simon Group's** disciplinary system.

- Enforce penalties for violations of this Human Rights Respect Policy by Company employees or third parties.

3.1 Due diligence measures

In order to identify, prevent, mitigate and respond to any adverse impact that may arise from the activities of the Company or third parties, Simon Group has established an internal and external Human Rights due diligence process.

In the first instance, Simon Group, aware of the potential impact of its activities on Human Rights, will engage in discussions and consultations with its employees and customers to identify and assess any conduct by the Company itself that may have an adverse impact on Human Rights.

Moreover, with regard to suppliers and other third parties with whom Simon Group interacts, the Company will communicate its non-acceptance of conduct that may have an adverse impact on Human Rights and will request that said parties respect these when carrying out their activities with the Company. The Company may undertake actions to check that the third parties in question comply with the principles of respect for Human Rights. These checks may not be limited to Simon Group's direct suppliers and may extend to the various actors involved in its supply chains.

Furthermore, Simon Group may demand certain third parties with whom it interacts to comply with the commitments included in this Policy, either through the signing of contractual clauses on Human Rights or through other means, for which the Company will have the authority to terminate its relationship in cases where the third parties fail to comply with any of its provisions.

The findings of such due diligence measures, both internal and external, shall be documented and included in relevant internal reporting procedures in order to provide an effective response to such impacts (whether through decision-making, budget allocations or monitoring processes), as well as to record performance over time, enabling adjustments to be made to the Simon Group's priorities and approach to actions with a Human Rights impact.

3.2 Remediation measures

In the event that the Simon Group finds that it has caused or contributed to causing adverse human rights impacts in the course of its activities, it will assess what actions it can take to promote remediation.

3.3 Disciplinary measures

Failure to comply with the provisions established in this Respect for Human Rights Policy by employees of Simon Group may lead to disciplinary measures enforced by the Company in accordance with the applicable regulations in each territory.

In cases where Human Rights violations have been committed by third parties with whom Simon Group interacts, the Company will pursue the contractual and legal measures it deems appropriate and proportionate for each situation, including contract termination and, if necessary, reporting the incidents to public authorities.

4. Organizational matters

To ensure respect for Human Rights in the course of its activities, Simon Group and all its employees will be supported by the following organizational elements:

4.1 Leadership

The management bodies and senior management of Simon Group are primarily responsible for promoting and upholding respect for Human Rights in the course of the company's business activities.

Furthermore, the attitude and commitment of the management bodies and senior management largely determine the ethical stance and commitment to Human Rights within Simon Group.

Therefore, the management bodies and senior management of Simon Group are committed to setting an example in terms of respect for Human Rights for all employees of the Company.

Failure to comply with this Policy may result in penalties in accordance with **Simon Group's** disciplinary system.

4.2 Supervisory body and communication channel

Nevertheless, the Board of Directors of Simon Group, in order to ensure respect for Human Rights at all times, have appointed a Compliance Committee as the body responsible for supervising the proper development, implementation, and monitoring of this Respect for Human Rights Policy.

Employees of Simon Group should contact the Compliance Committee in case of doubts regarding how to act in specific situations, as well as to report any incidents that may have an impact on Human Rights or that may contribute to improving this Policy.

Such communications may be made through the Ethics Channel, which can be found at the following link:

<https://cdn.simonelectric.com/internal-repporting-system/index.html>

The Ethics Channel has been established as a completely confidential platform, which allows the reporting of violations anonymously and ensures that the person who reported a breach will not face any retaliation, provided that it is used in good faith.

4.3 Training and raising awareness on Human Rights

Simon Group encourages all its employees, regardless of their position and role in the Company, to be made aware of and receive appropriate, effective, and proportionate training regarding the Human Rights risks that affect the Company's activities.

5. Communication of this Policy

This Human Rights Policy shall be disseminated internally to all employees of Simon Group.

It will also be provided to Simon Group stakeholders at the beginning of their relationship.

Failure to comply with this Policy may result in penalties in accordance with **Simon Group's** disciplinary system.