



Human Rights Policy



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1. INTRODUCTION

As a listed company, the Board of Directors of Elecnor, S.A. (“**Elecnor Holding**” or the “**Company**”) is legally vested with the non-delegable power to determine the general policies and strategies of the Company and of the Group of which it is the controlling entity (“**Elecnor Group**” or “**Group**”), a power also set forth in the Regulations of the Board of Directors.

This Elecnor Group’s Human Rights Policy (the “**Policy**”) is based on the Group’s commitment to support, respect and protection of the human rights recognised in national and international law and considers and implements the requirements and recommendations established by the United Nations (the “**UN**”) and other international bodies, in accordance with the Elecnor Group’s ethical principles and commitments to sustainability due diligence.

Pursuant to the foregoing, the Board of Directors of Elecnor Holding has approved this Policy, which shall form part of the Company’s sustainability regulations and complements and must be interpreted in coordination with the Company’s various policies and, in particular, the “Elecnor Group’s General Sustainability Policy” and the “Elecnor Group’s Sustainability Due Diligence Policy”.

2. OBJECT

The purpose of this Policy is to formalise the Elecnor Group’s commitment to the defence, promotion and respect for human rights in the business activities of the Elecnor Group and of the individuals or legal entities that, by virtue of a commercial agreement with the Group’s companies, contribute as part of the Group’s activity chain to the provision of its services or the execution of its projects (the “**Business Partners**”).

3. SCOPE OF APPLICATION

This Policy and other internal implementing regulations established by Elecnor Holding are applicable to all the companies that make up the Elecnor Group.

Likewise, the Policy is applicable to joint ventures, temporary joint ventures and other equivalent associations in which any Elecnor Group company has management control, always within the legally established limits.

In those companies not directly or indirectly controlled by the Company, principles consistent with those of this Policy shall be promoted, maintaining information channels to ensure knowledge and monitoring of the human rights standards of such companies.

In any event, the various companies of the Group shall ensure that the principles of the Policy are projected onto their services and projects, as well as, to the extent appropriate, onto their Business Partners throughout the activity chain.

Furthermore, in implementing the principles of this Policy, the Group companies shall engage constructively with those stakeholders or interested parties that may affect or be affected by the activities of the Group and its Business Partners, in particular employees, trade unions and representatives of the employees of the Group companies and of the Business Partners in the activity chain, as well as national human rights institutions and the legitimate representatives of such persons and groups (the “**Stakeholders**”).

4. OUR COMMITMENT

Since the beginning of its activities, the Elecnor Group has been fully committed to supporting, respecting and protecting human rights in all its areas of activity in accordance with its ethical principles and sustainability commitments, complying with applicable national and international regulations, and taking international standards and recommendations into account.

In turn, the Group's human rights commitments, which are the subject of this Policy, are based on the "Elecnor Group's Code of Ethics and Conduct", the "Elecnor Group's General Sustainability Policy" and, in particular, the "Elecnor Group's Sustainability Due Diligence Policy", and are also aligned with the most relevant international human rights norms and standards, such as the UN Guiding Principles on Business and Human Rights, the Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises, the principles on which the UN Global Compact is based, the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy and the conventions of the International Labour Organisation (including Convention 169), the Sustainable Development Goals approved by the UN, as well as the documents and texts that may replace or complement the aforementioned.

In line with the above and in compliance with due diligence obligations, the Elecnor Group undertakes to identify, assess, prioritise, prevent, mitigate and, where appropriate, remedy any form of adverse impact on human rights that may arise from its services and projects or from its Business Partners in the activity chain.

5. PRINCIPLES

The Elecnor Group will not participate in actions that compromise the universal human rights recognised in national and international legislation.

In order to achieve the aforementioned objectives and commitments, the Group assumes and promotes the following principles that must govern the actions of all the companies that comprise it in all its spheres of action, also ensuring their projection on its Business Partners throughout the activity chain:

- Promote a culture of respect for human rights and actions aimed at raising awareness of human rights among employees
- Guarantee non-discrimination on grounds of sexual or gender orientation or identity, age, race, disability or any other personal or social circumstance susceptible to discrimination, promoting equal opportunities and respect for diversity
- Reject forced labour in all its forms and any manifestation of abuse of authority, as well as, especially, the use of child labour
- Protect the health and safety of its professionals by making safety a non-negotiable value and committing to zero accidents and harm to people's health
- Respect the rights of local communities with special attention to the most vulnerable groups, such as ethnic minorities and indigenous populations, promoting initiatives and continuous dialogue with them. In particular, the right of these communities to an adequate, healthy and sustainable environment shall be respected, taking into account their expectations and needs
- Reject corruption in all its forms by committing to the highest ethical standards and compliance with the law, as well as applying the principle of zero tolerance for malpractice

- Respect the freedom of affiliation and association of its employees, as well as the free movement of people
- Ensure the confidentiality and right to privacy of Stakeholders and guarantee respect for privacy and data protection regulations, also establishing the relevant information security measures.
- Adopt the appropriate measures as soon as possible in the event of detecting a violation of human rights in the facilities, centres or places where the Group's companies or its Business Partners carry out their activities, and to inform the competent public authorities in the terms deriving from the applicable regulations in this regard.

6. IMPLEMENTATION AND MONITORING

In order to guarantee the effectiveness of the commitments acquired in this Policy, Elecnor Holding shall set forth definitions, which shall apply at the Group level, for the internal rules, procedures and protocols necessary for the implementation and monitoring of this Policy.

All members of the Elecnor Group organisation are obliged to comply with the precepts of this Policy regardless of the country or region in which they are located.

7. GOVERNANCE

The bases of the Group's governance in terms of sustainability established in the "Elecnor Group's General Sustainability Policy" are part of this Policy, contemplating in this respect the competencies and functions corresponding, on the one hand, to the Board of Directors and its Committees, the Appointments, Remunerations and Sustainability Committee and the Audit Committee, and on the other hand, to the Sustainability Committee and the person responsible for the sustainability function, with this governance being projected onto the various companies comprising the Elecnor Group.

8. REVIEW AND UPDATING

This Policy shall be reviewed and updated when circumstances so determine or make it advisable based on regulatory changes, international standards, new commitments, best practices, or criteria established by the supervisory and control authorities in the area of human rights, in addition to circumstances related to the evolution of the structure and activities of the Elecnor Group.

9. DISSEMINATION OF THE POLICY

Elecnor Holding will promote the dissemination of this Policy in the Company and its Group, also taking into account its Business Partners and Stakeholders, and promoting awareness of it is a basic commitment of this Policy.

The Policy is available on the Group's website (www.grupoelecnor.com) and through internal communication channels for all employees.

10. ENTRY INTO FORCE

This Policy was approved by the Board of Directors of Elecnor Holding at its meeting held on 27 November 2024, coming into force as of that date, without prejudice to the Elecnor Group being able to avail itself of the deadlines contemplated in the applicable regulations regarding the enforceability of obligations in the area of sustainability due diligence.