

Human and Labour Rights Policy

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Human and Labour Rights Policy

1 Introduction

Haya Energy Solutions is firmly committed to respecting and promoting human and labour rights. Respect for human dignity is fundamental to the well-being of our organization and of all the individuals we interact with, including employees, suppliers, clients, and communities.

Our company values compliance with the principles established by international and local regulatory frameworks concerning human and labour rights. Through this policy, *Haya Energy Solutions* reaffirms its commitment to operating with integrity, responsibility, and transparency, promoting a fair, equitable, and discrimination-free work environment.

2 Objective and Commitment

The objective of this document is to ensure that all human and labour rights are respected during the company's activities. For this reason, our organization complies with the applicable laws and regulations and promotes the construction of a work environment based on respect, freedom, equality, dignity, and safety for all individuals involved.

Commitment to stakeholders; *Haya Energy Solutions* commits to:

- Fostering a work environment where diversity is valued and equal opportunities are guaranteed, regardless of gender, sexual orientation, religion, ethnic origin, age, disability, or any other personal or social condition.
- Preventing any form of forced labour, child labour, discrimination, and harassment. Likewise, promoting an inclusive workplace, free from any form of violence, intimidation, or retaliation.
- Ensuring respect for freedom of association and promoting open dialogue between employees and the company, fostering labour relations based on trust and mutual respect.
- Providing safe, healthy, and dignified working conditions for all staff, aligned with best practices in occupational health and safety.
- Establishing accessible and confidential mechanisms for receiving complaints or grievances related to the violation of labour and human rights.

In addition, the company takes a proactive approach to continuously improve its labour practices and human rights policies by reviewing its processes, incorporating best practices, and engaging in ongoing learning.

3 Scope

This document is of general and mandatory application for all individuals and entities directly or indirectly linked to *Haya Energy Solutions*. It applies to employees, executives, collaborators,

contractors, subcontractors, suppliers, and business partners, regardless of their geographic location or the area of activity in which they are involved.

The scope of this policy includes, among other aspects:

- All organizational levels within the company, from senior management to operational staff.
- All activities and operations carried out by the company, both on-site and on external projects, nationally and internationally.
- Decision-making and internal management processes, ensuring that the principles of this policy are integrated into corporate policies, people management, and strategic planning.
- New operations and acquisitions, ensuring that any future expansion or partnership is assessed with a focus on respecting human and labour rights.

Haya Energy Solutions expects all its partners and collaborators to share this commitment and to take actions aligned with the principles set forth herein, as part of a responsible, ethical, and sustainable business culture.

4 Regulatory Framework

Haya Energy Solutions bases its Human and Labour Rights Policy on international, regional, and national regulatory frameworks that guarantee the protection and promotion of individuals' fundamental rights. The main regulatory references guiding this policy include:

- **The Universal Declaration of Human Rights (UN)**, which ensures the protection of fundamental rights for all individuals.
- **The Conventions of the International Labour Organisation (ILO)**, which establish international labour standards, including the prohibition of child labour, forced labour, and the right to freedom of association.
- **The United Nations Global Compact**, which promotes principles related to human rights, decent work, environmental protection, and anti-corruption.
- **Local labour laws:** *Haya Energy Solutions* is committed to strict compliance with national laws governing labour relations in the regions where its activities take place.

In Spain, the company operates in accordance with the provisions of the Spanish Constitution, the Workers' Statute, and the Occupational Risk Prevention Act, among other relevant regulatory frameworks. In France, it complies with the provisions set forth in the Constitution of the Fifth Republic and the Code du Travail, as well as all applicable labour legislation.

In addition to these regulatory frameworks, the company is committed to respecting, applying, and promoting all regulations, standards, guidelines, and principles that reinforce the protection of human and labour rights within the business environment.

5 General Principles

Haya Energy Solutions is guided by the following principles in its operations and labour relations:

- **Respect for human dignity:** All employees must be treated with respect and dignity, promoting an inclusive environment free from discrimination.
- **Non-discrimination:** The company guarantees equal opportunities and treatment for all individuals, regardless of race, gender, sexual orientation, religion, disability, ethnic origin, or any other personal or social condition.
- **Fair working conditions:** The company is committed to ensuring that all employees enjoy safe, healthy, and fair working conditions, in accordance with applicable legislation.
- **Freedom of association and social dialogue:** We ensure respect for freedom of association and foster open dialogue between employees and the company, promoting labour relations based on trust, collaboration, and mutual respect.
- **Eradication of child and forced labour:** The company is committed to eradicating child labour and forced labour in all its operations.
- **Occupational health and safety:** We will promote a safe working environment by implementing practices and policies that minimize occupational risks.
- **Diversity and inclusion:** We promote a diverse organizational culture in which inclusion is a driver of innovation, sustainability, and social cohesion.
- **Shared responsibility and participation:** We encourage the active participation of employees in the continuous improvement of the work environment and in the implementation of this policy, through social dialogue and internal consultation mechanisms.
- **Human rights due diligence:** We adopt a preventive approach through due diligence processes that allow us to identify, assess, and mitigate potential adverse impacts on human rights arising from our activities.

6 Action Procedure

To ensure the proper implementation and compliance with this policy, *Haya Energy Solutions* establishes the following action procedures:

- **Reporting mechanisms:** All employees, suppliers, and other stakeholders may report, confidentially and without fear of retaliation, any suspicion or evidence of non-compliance with this policy. A secure communication channel has been established via the following email: hes@hayaenergy.com, which is available to anyone wishing to report conduct that violates the company's ethical principles.
- **Conflict management and inappropriate behaviour:** The company promotes conflict resolution through open dialogue, mutual respect, and cooperation between the parties

involved. The company's Code of Conduct outlines the internal process for managing conflicts and inappropriate behaviour. This procedure also serves as a safe channel for reporting situations such as abuse of power, harassment, misuse of information, fraud, or any other conduct contrary to the company's principles.

- **Investigation of reports:** All reports will be handled with absolute confidentiality and diligence. Investigations will be carried out objectively and impartially, ensuring the protection of the rights of both the whistleblower and the individuals involved.
- **Corrective action:** If any violations of this policy or the company's ethical principles are confirmed, appropriate corrective measures will be taken. These may include disciplinary actions for the employees involved or a review of contractual relationships with suppliers or contractors.

7 Final Provisions

7.1 Communication and Compliance with the Policy

This policy will be communicated through appropriate channels to ensure its accessibility and understanding by all stakeholders. It will be sent via email to all *Haya Energy Solutions* staff and its contents will be explained in internal information sessions, and it will be published on the corporate website to ensure that all interested parties — including contractors, suppliers, and other partners — can access and understand the company's commitments regarding human and labour rights.

Each employee will be responsible for adhering to the principles set forth in this policy, and senior management will be responsible for ensuring its effective implementation throughout the organization.

7.2 Monitoring

The company will conduct periodic reviews of this policy to ensure its compliance, relevance, and alignment with the evolution of applicable regulations, as well as with national and international best practices in the field of human and labour rights.

7.3 Date of Approval

This document was approved by the management of *Haya Energy Solutions* on 16 April 2025.

The signature of this document by the management confirms its agreement with the terms and its implementation within the company.

8 Signature of the document