

## Human Rights Policy

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*This document is a translation of the original Spanish.*

*If there are differences between this translation and the original, the Spanish text will be considered the official source.*

# 1 Introduction

The Altia Group operates in a constantly evolving technological, social and regulatory environment, where respect for human rights is an essential element for trust, sustainability and corporate responsibility. Innovation, digital services and the contribution of the Group's professionals are fundamental pillars of our business model, which is why their responsible management is a strategic priority.

The Group is committed to respecting and promoting internationally recognized human rights, in accordance with the United Nations International Bill of Human Rights, the 10 principles of the United Nations Global Compact and its Sustainable Development Goals (SDGs), the Fundamental Conventions of the International Labour Organization (ILO) and other widely accepted frameworks of reference. This commitment is articulated in a manner consistent with existing internal policies, such as the Code of Ethics, which establishes the values and principles of conduct and promotes integrity, transparency and accountability; the internal Code of Conduct and the Guide to non-sexist language; equality plans and policies; protocols for the detection and treatment of gender-based violence; the Policies for the Prevention of Harassment in the Workplace, Sexual and on the Basis of Sex, Sexual Orientation or Gender Identity; the Data Protection Policy or the Stakeholder Management Policy.

This Policy establishes the general framework that guides the Altia Group in the field of human rights and provides a common basis for integrating these principles into the relationships and activities it develops.

## 2 Objective of the Policy

The objective of this Policy is to define the principles and commitments that guide the Altia Group's actions in the field of human rights, establishing a clear frame of reference for all the people who are part of the organization and for the relationships we maintain with third parties. Its purpose is to ensure responsible, coherent action in line with applicable international standards.

## 3 Scope and scope

This Policy is mandatory for all professionals of the Altia Group, regardless of their legal relationship with the company, their hierarchical level, their function, their geographical location and the company of the Group for which they provide their labor or professional services. All of them must be aware of and act in accordance with the principles set out in this document and in the related internal policies.

This Policy is applicable in all countries where the Altia Group operates. Its implementation will be adjusted to the regulations in force and to the cultural contexts of each territory, maintaining a common approach based on respect for internationally recognized human rights.

Altia Group companies will encourage their suppliers, business partners and other third parties with whom they have professional relationships to act in a manner aligned with the principles of this Policy and with international human rights standards.

## 4 Guiding principles

The guiding principles of this Policy establish the Altia Group's framework for action in the field of human rights and guide decision-making in all the Group's activities.

### 4.1 Respect for human dignity

We recognize the intrinsic dignity of all people and guarantee respectful, professional and fair treatment in all labor, commercial and social relationships, promoting a safe environment free from any form of abuse or degrading treatment.

### 4.2 Equality and non-discrimination

We promote equal treatment and opportunities, rejecting any form of discrimination on personal, social or cultural grounds. This principle is applied in a transversal way in the Group's decisions, policies and actions.

### 4.3 Commitment to a culture of human rights

We foster an internal culture that incorporates respect for human rights as part of the Altia Group's way of working, reinforcing awareness, training and internal communication so that all people know and apply these principles in their activity.

### 4.4 Integrity and Compliance

We act in accordance with applicable laws in all territories in which the Altia Group operates and maintain a firm commitment to integrity, transparency and ethical conduct as essential elements of our business.

## 4.5 Responsible and ethical use of technology

We promote the responsible development and use of our technological solutions, considering their possible impacts on people, privacy, security and fundamental rights, especially in digital environments and advanced technologies.

## 4.6 Privacy and data protection

We protect personal and professional information in accordance with current regulations, applying security, confidentiality and proportionality criteria that guarantee appropriate treatment for all the people and entities with whom we interact.

## 4.7 Prevention and proportionate action

We seek to anticipate and appropriately manage situations that may compromise human rights, adopting measures proportionate to our size, context, activity and the level of risk associated with each operation or professional relationship, acting in a manner consistent with the principles of prudence and corporate responsibility.

## 4.8 Accountability and internal consistency

All the people of the Altia Group share the responsibility to act in accordance with these principles and to contribute to maintaining an organizational culture based on respect, inclusion, integrity and the promotion of Human Rights in all actions.

## 4.9 Extension of the Principles to Third Parties

We promote and demand that our suppliers, collaborators and business partners maintain behaviors consistent with these principles, fostering relationships based on respect, legality, equality and the dignity of people.

# 5 Key commitments to stakeholders

The Altia Group assumes a series of commitments that guide its action in the field of human rights in its labor, commercial and social relations. These commitments are applied with an approach proportional to the Group's activity and the risks associated with each environment.

## 5.1 Professionals

The aim is to guarantee a safe, inclusive and respectful work environment, protecting the human and labour rights of all the people who make up the Altia Group.

### **Equal treatment, diversity and inclusion**

- Promote a diverse and inclusive work environment, guaranteeing equal treatment and opportunities and rejecting any form of discrimination based on gender, age, origin, nationality, religion, sexual orientation, gender identity, disability, social status or any other personal characteristic.
- Promote relationships based on mutual respect, free of harassment, violence or any conduct that violates the dignity of people.
- Eradicate any form of physical, sexual, psychological, or verbal harassment or aggression.
- Reject any form of violence or abuse of authority at work and any conduct that generates an intimidating or offensive environment.

### **Fair, safe and healthy working conditions**

- Ensure fair, safe and healthy working conditions that promote physical, mental and emotional well-being, promoting measures that facilitate work-life balance, the right to rest and digital disconnection.
- Guarantee decent pay and fair pay conditions, as well as equal pay between women and men.
- Respect the participation of personnel in Occupational Risk Prevention.
- Actively promote training and professional development, planning training actions in accordance with the needs detected and the Group's strategic decisions.
- Consolidate a preventive culture through information, training and resources that contribute to the care and safety of all people

### **Freedom of association, association and collective bargaining**

- Respect freedom of association, the right of association and the participation of workers in processes that affect them.
- Ensure that those who exercise representative functions do not suffer disadvantages, reprisals or limitations in the exercise of these rights.

- Recognize the right to bargain collectively in accordance with applicable local laws and regulations.

### **Prohibition of child, forced or exploitative labour**

- Absolutely reject forced labour, child labour, labour exploitation or any form of modern slavery, ensuring that all labour relations are developed on the basis of respect, human dignity and compliance with current regulations.
- Apply appropriate internal criteria to identify and act proportionately in situations that may be incompatible with this commitment.

### **Right to privacy**

- Guarantee respect for the privacy and protection of the personal data of all workers, applying criteria of responsible, safe treatment and in accordance with current regulations.
- Ensure that internal systems and processes protect information from unauthorized access, misuse, or loss of data.

## **5.2 Customers**

The Altia Group focuses its activity on the creation of safe, accessible technological solutions that are aligned with fundamental rights. In this area, the Group undertakes to:

### **Non-discrimination in access to and use of services**

- To ensure that access to the Altia Group's products, solutions and services is carried out without discrimination of any kind, providing an experience of equal relationship and attention and based exclusively on objective, professional and transparent criteria.

### **Responsible development and use of technology**

- Integrate ethical principles in the design, development and deployment of our solutions, especially those based on advanced technologies such as artificial intelligence, ensuring that their use is safe, responsible and aimed at generating social value, assessing the possible impacts on people and their environment.

### **Clear information and transparency**

- To provide customers with accessible, truthful and sufficient information about products and services, their characteristics, risks and functionalities, allowing an informed and conscious use of technological solutions.

#### **Privacy and data protection**

- To protect the personal and professional information of customers through responsible, transparent treatment in accordance with current regulations, guaranteeing confidentiality and appropriate use of the data provided.

#### **Cybersecurity and digital protection**

- Offer infrastructures, technological solutions and services developed under security criteria, minimising the risks of unauthorised access, misuse or loss of information.
- Ensure effective incident response, prioritizing customer protection and service continuity.

#### **Respect for freedom of information and expression**

- Ensure that services, platforms and technological solutions are not used to unjustifiably restrict freedom of expression or access to information, always acting in strict compliance with applicable legislation and responding to official requirements in a proportional and justified manner.

## 5.3 Suppliers and business partners

The Altia Group promotes responsible relationships with suppliers and business partners and requires that its conduct be consistent with the principles of this Policy.

#### **Commitment to human rights and equality**

- Demand from suppliers and partners the same commitment to human rights, equality, diversity and sustainability that governs Altia Group's operations, encouraging compliance with labor and ethical standards throughout the supply chain.

#### **Prohibition of child, forced or exploitative labour**

- Reject any form of child, forced, modern slavery or exploitation in the supply chain, ensuring that all employees strictly comply with applicable labour legislation.

#### **Transparency, anti-corruption and good practices**

- To establish relationships with suppliers and partners based on ethics, transparency and mutual respect, promoting responsible practices in all commercial collaborations and in the development of joint projects.

- Comply with and demand compliance with Altia Group's anti-corruption policy, reinforcing transparency in the purchasing and selection processes of suppliers and avoiding conflicts of interest or any practice contrary to business ethics.
- Require suppliers to maintain anti-corruption compliance prevention and control systems, including records of payments, gifts and hospitality, and allow audits and verifications, reinforcing responsibility, accountability and ethics throughout the Group's value chain
- Ensure that any subcontractor complies with the same anti-corruption obligations as the main suppliers and that it undergoes the necessary verifications, contributing to a safe, upright business environment aligned with the principles of respect and protection of Human Rights.

### **Responsible materials and components**

- Ensure that the supply chain is safe, ethical and sustainable, avoiding the acquisition or use of materials, components or services linked to armed conflicts, human rights violations or improper labour practices.

## **5.4 Community and society**

The Altia Group aspires to contribute positively to the economic, social and environmental development of the communities in which it operates, committing to:

### **Ethical and responsible relationships**

- Establish transparent and ethics-based links with governments, public bodies and institutional entities, fostering mutual trust and responsible cooperation in all activities.
- To promote practices that respect and protect human rights in all institutional relationships, ensuring that Altia's decisions and actions contribute to the well-being and dignity of people.

### **Integrity and transparency in external relations**

- Act with integrity, transparency and responsibility in all relations with Public Administrations, regulatory organisations, civil organisations and local communities, avoiding conflicts of interest and practices that may compromise the reputation or ethical principles of the organisation.

### **Regulatory and legal compliance**

- Ensure strict compliance with current regulations in all operations and decisions, ensuring that the Altia Group's actions are aligned with local, national and international legal frameworks.

### **Responsible taxation**

- To practice responsible fiscal management, complying with current regulations and contributing in a fair and transparent manner to the economic well-being of the territories where it operates.

### **Education, inclusion and talent development**

- Boost social impact and employability through initiatives that promote technological education, digital training, social inclusion and the development of digital skills, contributing to the reduction of gaps in access and opportunities.

### **Open dialogue**

- Respect the norms, customs and cultural contexts of each region, adapting the Altia Group's actions to local diversity, always under the universal principles of human rights and promoting inclusion and social equity.

### **Environmental protection**

- To contribute to the protection of the environment, applying responsible practices that reduce the environmental impact of the Group's activity, always in line with the Group's sustainability commitments.

## **6 Governance and responsibility in Human Rights**

Respect for human rights is part of the Altia Group's sustainability commitment and is integrated into the governance framework already established in the Sustainability & ESG Policy. In accordance with this model, the responsibility for applying this Policy is transversal and corresponds to all areas and companies of the Group.

The preparation and updating of Altia's Human Rights Policy is the responsibility of Altia's Sustainability and ESG Department (with the support of other cross-cutting areas), which is responsible for defining the principles, objectives and commitments aligned with international standards and the values of the Altia Group. Once developed, the Policy is approved by the Board of Directors, ensuring its support at the strategic and corporate level.

Each area and each company of the Altia Group is responsible for incorporating the principles and commitments of this Policy into its daily management, guaranteeing behaviors that respect human rights in its operations, professional relationships, and technological and commercial activities.

## 7 Communication and reporting channels

The Altia Group makes formal mechanisms available to its stakeholders to report, confidentially and securely, possible human rights violations, regulatory breaches or conduct contrary to the principles set out in this Policy or other mandatory Policies.

These mechanisms are part of the Altia Group's Internal Information System (SII), configured in accordance with the applicable regulations and composed of the different channels enabled by the companies that make up the Group. The SII allows irregularities to be reported or doubts or suggestions to be raised and guarantees diligent, confidential treatment in accordance with the legal requirements in each jurisdiction in which the Group operates.

Likewise, the Altia Group companies maintain specific channels for matters that require differentiated treatment, such as communications related to situations of discrimination or harassment, or those subject to legal requirements specific to certain countries in which the Group companies have a presence.

Each company in the Group maintains access to its Ethics Channel through its website, guaranteeing its availability and accessibility.

The Altia Group is committed to guaranteeing the confidentiality of the information received, protecting the identity of those who report facts in good faith and ensuring that they do not suffer reprisals for using the available channels.

Communications received through existing channels will be managed by the competent areas in accordance with the internal procedures in force, assessing each situation and adopting the corresponding measures in accordance with its nature, seriousness and applicable regulatory framework.

## 8 Transparency and monitoring

The Sustainability & ESG Division will monitor the progress associated with this Policy and will transfer the relevant information to Senior Management and the Board of Directors within its scope of supervision.

The Policy may be revised when necessary, either to adapt it to regulatory changes, to the evolution of the Group or to incorporate good practices that reinforce its application.

The Policy will be publicly available on the Altia Group's corporate website and, where appropriate, on the websites of the companies that make it up. It will also be accessible internally through corporate channels.

Altia will annually report on the progress related to this Policy through its Sustainability Report, providing stakeholders with clear and regular information on the Group's human rights performance.

# ALTIA

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