



# HUMAN RIGHTS DUE DILIGENCE POLICY

TRANSPORT SYSTEMS  
TRAINS  
BUSES  
SIGNALLING  
COMPONENTS  
SERVICES

**Your Way**  
to Future Mobility

*The following English translation is provided by the Company for information purposes only, based on the original and official document in Spanish available on the Company's website. In the event of any discrepancy between the English version and the Spanish original document, the latter will prevail.*

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## **1. INTRODUCTION AND PURPOSE**

Respect for Human Rights is one of the principles on which the CAF Group's actions are based, in a general and invariable manner in all the countries in which it operates and in all the companies that form part of the Group. This is stated in the CAF Group's Code of Conduct, which outlines its commitment to a culture of ethics and regulatory compliance and sets out the general rules and principles of corporate governance and professional conduct that serve as a guide to establish the guiding parameters of the corporate culture.

In this regard, the General Principles of the CAF Group's Code of Conduct are imperative rules of conduct and ethical standards founded in scrupulous respect for laws, Human Rights, public freedoms and Fundamental Rights, the principles of equal treatment and non-discrimination, protection against child labor, and any other principles contained, as a minimum, in the following instruments and in their corresponding current and future wordings:

- The International Bill of Human Rights (comprising the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social, and Cultural Rights);
- The Guiding Principles on Business and Human Rights published by the United Nations;
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD 2023);
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the Monitoring thereof; and
- The United Nations Global Compact on Human Rights, labor rights, the environment, and anti-corruption, to which CAF is a signatory.

In furtherance of the foregoing, the Board of Directors of Construcciones y Auxiliar de Ferrocarriles, S.A. ("**CAF**" or the "**Company**") as the parent company of the CAF Group (the "**CAF Group**" or the "**Group**") has approved this **Human Rights Due Diligence Policy** (the "**Policy**"), within the framework of the legally attributed non-delegable power to determine the general policies and strategies of CAF and the Group, by means of which it ratifies its commitment to the ethical and compliance culture, assuming its responsibility to respect Human Rights in the scope of its activity and value chain in a more detailed manner, and specifying the means available to effectively carry out its management focusing on Due Diligence and accountability in relation to the effectiveness of said process.

Therefore, this Policy and, in general, all procedures, activities, and operations of the Group with regard to Human Rights are based on the international reference guidelines mentioned above as part of the General Principles of the Code of Conduct of the CAF Group, as well as those of other international and supranational bodies, which are integrated into this or which are themselves expressly recognized, such as the constitutions and national laws that recognize or apply Human Rights in all jurisdictions in which CAF operates.

At the same time, through this Policy, the CAF Group declares its observance of the main international guidelines that may be defined in this area and, in particular, in addition to those already mentioned, the following:

- The United Nations Sustainable Development Goals (SDGs).
- The OECD Due Diligence Guide for Responsible Business Conduct (OECD, 2018).
- The regulations applicable to the due diligence of organizations at the European level

## **2. SCOPE**

This Policy is applicable to and mandatory for all entities comprising the CAF Group, across all jurisdictions in which it operates and for all employees, shareholders, directors, or members of a governing body of any CAF Group entity ("**Members of the CAF Group**", or the "**Members**"). This is regardless of the position they hold or their geographical location, without detriment to the autonomy and independence of each company and the modifications or adaptations that may be necessary to comply with the applicable regulations in each case.

Similarly, the CAF Group shall require compliance with this Policy by third parties in the value chain with whom the CAF Group has established some type of business relationship and especially project partners, agents, suppliers, and clients ("**Business Partners**") in accordance with the particular features of each typology and in accordance with the levels set in the standards and best practice guides on the subject, keeping the Policy available to all its Stakeholders, as defined below.

## **3. DEFINITIONS**

Definitions not expressly mentioned in this Policy shall be interpreted in accordance with the international standards and applicable regulations referenced in the first paragraph of this Policy, as well as in accordance with the applicable legislation in each jurisdiction.

**Business Relationships:** Relationships with Business Partners and companies in the value chain, as well as with any other governmental or non-governmental entity directly linked to the company's operations, products, or services.

**Value chain:** All activities carried out by the CAF Group in different geographic locations (regions, countries, etc.) necessary for the production of goods and services offered by the Group.

**Stakeholders:** Individuals or groups that have interests that are or could be affected by the CAF Group's activities on a global scale. In this respect, the Stakeholders will be, in any case, the holders of Human Rights, i.e. groups such as employees, members of a specific community in which the Group operates, Human Rights defenders, workers in the supply chain, and end users of the products produced by CAF, for example.

## **4. DUE DILIGENCE APPROACH**

The CAF Group adopts a proactive approach to due diligence throughout its value chain on an ongoing basis, establishing the appropriate frameworks, procedures, and processes to identify, assess, prevent, mitigate, control, and monitor potential adverse Human Rights impacts.

In relation to the foregoing, the approval of this Policy shall be the responsibility of CAF's Board of Directors, without detriment to the participation of the CAF Group's Compliance Function in the duties of compliance supervision and implementation of the Policy.

In this regard, without detriment to that indicated below in the section on the implementation of the Policy, the following shall be kept permanently updated and in application as a minimum:

- the Supplier Code of Conduct, which establishes the minimum ethical requirements for both direct suppliers and the entire value chain, and
- the specific Human Rights Due Diligence Procedure considering, in particular, the mandatory actions to be included in any due diligence process.

This Human Rights Due Diligence Procedure shall always be based on international best practices, including those defined in the first section of this policy, although customized according to the specific needs and operations of the CAF Group.

In this regard, account shall also be taken of the possibility that the European Union Agency for Fundamental Rights, or, where appropriate, any other competent EC body, may define additional specific guidelines for the interpretation of European regulations in the future, so any guideline, reference, or criterion issued thereby shall be taken into account and, where appropriate, incorporated into the Human Rights Due Diligence subsystem, in accordance with the provisions of the implementation section of this Policy.

## **5. HUMAN RIGHTS COMMITMENTS**

The fundamental purpose of this Policy is the promotion and respect of all Human Rights recognized in international treaties and applicable legislation. To this end, the CAF Group establishes its priority areas of action on this subject following the international legal instruments, guidelines, and standards identified in the first section of this Policy.

In this sense, the CAF Group bases its actions on the premise that all human rights are universal and are based on the inherent dignity of all human beings; they are equal, indivisible, interdependent, and interrelated.

### **5.1. GENERAL COMMITMENTS ON THE SUBJECT OF HUMAN RIGHTS**

Based on the foregoing and in view of the need to adapt due diligence to specific commitments linked to the CAF Group's activity, some general commitments and principles regarding Human Rights are listed below, and will be covered in more detail in this Policy and in its internal implementation regulations:

1. **Child Protection**
2. **Principle of non-discrimination**
3. **Respect for Labor Rights**
4. **Respect for the rights of persons with disabilities**



5. Respect for the rights of minorities and indigenous peoples
6. Respect for gender equality
7. Principle of racial non-discrimination
8. Prohibition of torture and inhuman treatment
9. Prohibition of human trafficking
10. Environmental responsibility
11. Compliance with regional Human Rights standards
12. Compliance with the applicable regulations in each jurisdiction
13. Observance of privacy management and new technologies and artificial intelligence with respect to Human Rights

To ensure compliance with the aforementioned Human Rights principles, the following is a series of specific commitments differentiated according to the groups involved in the Group's activities on a global scale, taking into account not only the Members of the CAF Group, but also the entire value chain and Stakeholders.

## **5.2. COMMITMENTS IN THE RECURRING ACTIVITY OF THE CAF GROUP AND THROUGHOUT THE VALUE CHAIN**

### **5.2.1. Rejection of forced or compulsory labor and child labor**

The CAF Group recognizes and respects the rights of minors as established in the Convention on the Rights of the Child, prioritizing the protection and well-being of minors in all aspects of the Group's operations.

To this end, the CAF Group rejects any form of forced or compulsory labor as well as any form of slavery and human trafficking, in accordance with the ILO Forced Labor Convention, and any form of holding workers against their will.

In particular, the use of child labor is not permitted and the minimum age of workers is defined by the legislation of each jurisdiction in which the activities are carried out and in any case must not be lower than the minimum age established by the ILO Minimum Age Convention.

### **5.2.2. Respect for diversity and the principle of non-discrimination**

The CAF Group guarantees the observance of the principle of non-discrimination, as enshrined in the International Bill of Human Rights, throughout its value chain. In this regard, the CAF Group is committed to treating all CAF Group Members, Business Partners, and Stakeholders, regardless of race, gender, age, disability, religion or any other characteristic or circumstance, with equal respect and dignity.

To this end, the CAF Group promotes the principles of diversity, inclusion, and equal treatment and opportunities, and is committed to guaranteeing the right to working conditions that respect personal dignity, as well as to creating a work environment where people are treated fairly and valued for their individuality.

Likewise, the Group is committed to protecting the physical and psychological integrity of each person, opposing any form of behavior that is discriminatory on the basis of gender, age, disability, nationality, sexual orientation, ethnicity, religion, political opinions, and any other form of individual diversity, or that is harmful to the person and his or her convictions or preferences, promoting people's freedom of expression.

Therefore, physical, verbal, visual, sexual, or psychological harassment that creates, in any case, a demeaning, hostile, humiliating, intimidating, offensive, or unsafe work environment is not tolerated.

In any case, the CAF Group must maintain an inclusive hiring process and work environment, in which diversity is promoted based on a transversal, global, social, and committed strategy, and which is also free of any discrimination and any abusive or hostile conduct involving harassment of a personal nature.

In particular, accessibility and equal opportunities for people with disabilities will be guaranteed, in compliance with the commitments established in the International Convention on the Rights of Persons with Disabilities.

The CAF Group is also committed to the energy transition and the constant improvement of inclusive mobility, offering innovative and inclusive services for its clients regardless of their age, and especially for people in situations of vulnerability, marginalization, dependence or disability.

### **5.2.3. Promotion of gender equality**

CAF Group is committed to promoting gender equality and women's rights in accordance with the Convention on the Elimination of All Forms of Discrimination against Women.

### **5.2.4. Freedom of association and collective bargaining**

The CAF Group protects the right of employees to form or participate in organizations aimed at defending and promoting their interests.

The Group also respects their right to be represented, within the various work units, by trade unions or other forms of representation chosen in accordance with the laws and practices in force in the various countries in which they operate.

The CAF Group considers collective bargaining to be the preferred instrument to determine the contractual conditions of individuals and regulate relations between management and trade unions.

### **5.2.5. Health, safety, and welfare**

The CAF Group believes that the health, safety, and psychological, relational, and physical well-being of people is the most precious asset to be protected at all times, at work, at home, and during leisure time. The CAF Group is also committed to developing and disseminating a strong culture of promoting health, safety, and well-being throughout the Group to ensure that workplaces are free of health and safety hazards and promoting family and personal reconciliation.

In turn, the CAF Group is actively committed to fostering personal and organizational well-being as an enabler of people's innovative potential, thus promoting an environment oriented towards constant innovation and responsible, sustainable business.

To this end, the occupational risk prevention measures and policies at all levels of the activity must be constantly updated, managed in an integrated manner, and be known to the Members of the CAF Group, respecting, in all cases, the applicable regulations.

In any case, regardless of the jurisdiction in which the CAF Group operates, it will ensure adequate health care coverage for occupational accidents, establishing appropriate coverage systems when these do not exist or operate in the territories in which the Group operates. Additionally, the Group has set itself the target of achieving a zero accident rate.

Where workers are provided with accommodation, decent living conditions, safety and cleanliness, access to potable water, sanitation, and personal hygiene facilities, communication, electricity, and access to sanitary facilities must be guaranteed, so as to ensure an adequate level of personal space and privacy, as well as freedom of movement.

#### **5.2.6. Fair and favorable working conditions**

Each person working throughout the value chain is entitled to conditions that respect his or her health, safety, welfare and dignity, maximum working hours, daily and weekly rest periods, and holidays, leave, and annual vacations.

Workers' remuneration is based on the principles of fairness and respect for equal pay for men and women performing the same work in accordance with the ILO Equal Remuneration Convention.

The minimum remuneration cannot be lower than the minimum wage established in the collective bargaining agreements and legal regulations in force in each jurisdiction in accordance with the provisions of the aforementioned ILO convention.

At the same time, the CAF Group believes in the importance of professional orientation and training for the ongoing development of the people who work for the Group and their skills. Therefore, training initiatives must be carried out to enable the training and technical specialization of the CAF Group's employees so that they can perform their professional activity safely, develop, and adapt to the different needs in the performance of their professional work, in addition to knowing their rights and obligations in terms of Human Rights in the workplace.

#### **5.2.7. Rejection of corrupt practices**

There is a direct relationship, in line with that indicated by international organizations and the European Union, between the protection of Human Rights and the fight against corruption. The application of anti-corruption mechanisms and controls is also useful to avoid the violation of Human Rights, since these violations could occur



as a direct or indirect consequence of the aforementioned corruption practices that are to be eradicated and, in any case, combated.

In line with the international (United Nations and OECD) and EU vision, the CAF Group fights against the violation of Human Rights within its framework of zero tolerance against corruption.

### **5.2.8. Responsible taxation**

The CAF Group will take into account the approach of respecting Human Rights through responsible tax practices.

### **5.2.9. Privacy and personal data protection**

The CAF Group is committed to protecting individuals from arbitrary, unreasonable or unlawful interference with their privacy, family, home, or correspondence, as well as attacks on their honor and reputation. In this sense, "arbitrary" or unreasonable restrictions on privacy are prohibited even if they are authorized under a State's domestic laws.

In particular, the CAF Group respects the confidentiality and the right to privacy of Stakeholders, as well as the commitment to the correct use of the information and personal data of those who work for the organization, clients, and any other Stakeholders.

To this end, data protection by design (i.e., incorporated into the design of each corporate process) and by default (i.e., processing only to the extent strictly necessary and only for the period necessary to perform the data collection) are an integral part of the CAF Group's business processes, as is the analysis and management of risks in this area.

To ensure compliance with the regulations applicable in each jurisdiction, the CAF Group has Data Protection Officers appointed in the legally obliged entities, with a data protection office -that may be external or internal- made up of experts in the field, and regulatory implementation adapted to the needs of each of them, among other measures.

### **5.2.10. New Technologies and Artificial Intelligence**

In accordance with the provisions of the corporate Code of Conduct, the CAF Group will ensure responsible and ethical use of new technologies and, in particular, of Artificial Intelligence (AI), also protecting respect for Human Rights in this specific field and in the activities that could be related to its use, thus avoiding possible violations thereof.

In this regard, the CAF Group requires respect for the rule of law, Human Rights, and democratic values throughout the life cycle of the AI system and as a result will strive to achieve freedom, dignity and autonomy, privacy and protection of personal data, non-discrimination and equal treatment, diversity, equality, social justice and internationally recognized labor rights. To this end, the CAF Group will implement appropriate mechanisms and safeguards, ensuring the capability of the team of people involved in any phase of the AI system life cycle.

### **5.2.11. Extension of Human Rights commitments to Business Partners**

The Group collaborates with Business Partners that respect Human Rights and contribute to the socio-economic development of the communities in which they operate.

In this regard, in addition to other specific provisions of this Policy and in general, the commitments of the Policy are extended to Business Partners insofar as they may be applicable.

In particular:

- respect for Human Rights is taken into account in the design and construction of projects of infrastructure, equipment, and any other system in the areas in which the projects are to be developed and, as far as possible, social inclusion actions are implemented in these relationships with third parties, such as hiring local labor or contributing to the execution of local projects, among others.
- the basic operating premise adopted is the inclusion of contractual obligations with Business Partners to ensure the establishment and monitoring of these commitments in the area of Human Rights, in accordance with applicable international standards and taking into account the circumstances of each case.

## **5.3. ADDITIONAL COMMITMENTS TO COMMUNITIES, SOCIETY, AND THE ENVIRONMENT**

### **5.3.1. Respect for the rights of communities**

The CAF Group is aware that its activities may have a direct or indirect influence on the communities in the regions in which it operates. The Group is therefore committed to respecting the rights of these local communities by contributing to their economic and social growth.

Individual conditions, economic and social development and the general welfare of the community are strictly connected. In this sense, the Group is committed to carrying out actions both through the provision of services itself and through new business activities or, in certain cases, through the promotion of economic, social, or cultural development through non-business channels in the communities in which it is present, in order to improve social inclusion.

In particular, the CAF Group is committed to ensuring that its systems, equipment, mobility solutions, products, and services are designed to be accessible to all Stakeholders, and do not compromise the safety and physical integrity of its clients and end users, as far as may be reasonably foreseeable.

### **5.3.2. Respect for the rights of minorities and indigenous peoples**

The CAF Group respects the rights of minority and indigenous groups in accordance with the Declaration on the Rights of Persons Belonging to National or Ethnic, Religious, and Linguistic Minorities and the United Nations Declaration on the Rights of Indigenous Peoples beyond that required by local laws, thus complying with international standards.

Similarly, the Group protects cultural, historical, and religious heritage sites, avoiding participating in their damage or destruction or interfering with free access thereto by local or indigenous groups. Access of local and indigenous communities to their means of subsistence is also taken into consideration.

In developing its projects and within its framework, the CAF Group is committed to involving all relevant Stakeholders, including indigenous and tribal communities, as much as possible in order to promote active community participation during the projects.

### **5.3.3. Prohibition of racial discrimination**

The CAF Group strictly prohibits racial discrimination and promotes equality in accordance with the International Convention on the Elimination of All Forms of Racial Discrimination.

### **5.3.4. Prohibition of torture and genocide**

The CAF Group will not participate in any action that might contribute to genocide, in accordance with the Convention on the Prevention and Punishment of the Crime of Genocide. Furthermore, the CAF Group strictly prohibits torture and other cruel, inhuman or degrading treatment in any jurisdiction in which it operates, as described in the United Nations Convention against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment.

### **5.3.5. Prohibition of human trafficking**

The CAF Group strictly prohibits human trafficking in any form throughout its value chain and supports measures to combat this in accordance with the United Nations Convention against Transnational Organized Crime and the Protocol to Prevent, Suppress, and Punish Human Trafficking, especially women and minors.

### **5.3.6. Respect for the Human Right to a clean, healthy and sustainable environment**

The CAF Group is committed to complying with United Nations Human Rights Council Resolution 48/13 on the right to a safe, clean, healthy and sustainable environment and any future regulatory framework that may be developed in accordance with the main international standards.

In this sense, and in order to ensure sustainable industrial development, the Group will permanently take the Human Rights approach, among others, into account in the review and application of its environmental policies and environmental management systems, in accordance with the environmental legislation in force in the countries in which it operates and the best environmental standards.

These principles will be complemented by international regulations and best practice guides published after the approval of this Policy, particularly in the area of environmental Due Diligence.

### **5.3.7. Respect for regional standards and local regulations regarding respect for Human Rights**

The CAF Group respects and complies with regional human rights standards, including the African Charter on Human and Peoples' Rights, the American Convention on Human Rights and the European Convention on Human Rights, as applicable to CAF Group's operations in each of the relevant jurisdictions.

It also ensures strict compliance with the applicable Human Rights legal frameworks of each jurisdiction in which it operates.

## **6. POLICY IMPLEMENTATION**

The implementation of this Policy is essential to ensure compliance with the principles and commitments adopted in terms of Due Diligence and respect for Human Rights, for which reason the basic guidelines followed for this purpose are defined below.

In accordance with the provisions of the Guiding Principles on Business and Human Rights issued by the United Nations, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and the OECD Due Diligence Guidance for Responsible Business Conduct, which serve as the basis for the implementation of this Policy, the Human Rights Due Diligence subsystem defined by the CAF Group within its Corporate Compliance System includes, as a minimum, the following basic components:

- **Senior Management Commitment**

The CAF Group's Senior Management undertakes to implement and guarantee Human Rights throughout its value chain through the CAF Group's Code of Conduct and all provisions to that effect, and this Human Rights Due Diligence Policy is a further manifestation of the Group's commitment in this area.

- **Due Diligence procedure regarding Human Rights**

The CAF Group has defined an internal Due Diligence Procedure aimed at identifying, preventing and mitigating potential and actual adverse effects on Human Rights to which it may contribute or to which it may be directly linked, in all areas and operations of the Group, and undertakes to implement and continuously update this.

The aforementioned Procedure contains a large part of the implementation elements mentioned in this section of the Policy and is the guarantee of the adoption of reasoned business decisions based on risk management and compliance with corporate ethical standards.

In particular, this procedure provides for the management of any reparation mechanisms that may be applicable or the key aspects of the Group's information and reporting commitments in the area of Human Rights, among other things.

Additionally, the above is combined with other due diligence mechanisms such as those provided for in the CAF Group Due Diligence Manual for contracting with Third Parties or in the CAF Group Due Diligence Manual for International Sanctions. These instruments also take into account Human Rights aspects and, as a whole, make

it possible to adapt business processes and the established relationships to the specific risk and context, with the aim of adopting the appropriate contractual guarantees and organizational measures.

- **Identification and evaluation of risks and adoption of impact prevention, mitigation, and remediation measures**

As an essential part of the due diligence process, the CAF Group identifies and evaluates the risks related to Human Rights in all the Group's operations, considering factors such as geographic location, project circumstances and the business activities to be carried out by the CAF Group and its Business Partners, among others.

In accordance with this Policy, the CAF Group will keep its methodology up to date and will have the necessary operational elements in place to enable it to identify and assess both actual and potential risks (including adverse effects on Stakeholders) in the area of Human Rights.

Similarly, risk assessment is accompanied by the adoption of appropriate measures for the prevention and mitigation of potential and actual adverse effects and the integration of the conclusions of impact assessments in the corresponding projects, in addition to contributing to the continuous improvement process.

To this end, the control measures adopted are monitored and followed up periodically to evaluate their design and effectiveness. Where necessary, based on the results of the evaluation carried out, additional controls are implemented, taking into account the relevant indicators defined by the United Nations and implemented in the CAF Group, and any others that may be developed in other application frameworks as required by European or national regulations or by the European Union Agency for Fundamental Rights.

When an impact in relation to human rights materializes at any time during a project, the appropriate action to remedy the negative consequences for Human Rights caused or contributed to by the direct action of the CAF Group is analyzed and implemented.

- **Integration of Human Rights into Business Management and the value chain**

The CAF Group declares its commitment to permanently incorporating corporate policies, procedures, and controls in relation to Human Rights into its management systems, so that these are implemented as part of the Group's normal processes, taking into account the independence, autonomy, and legal structure of the companies, as well as their applicable regulatory framework. To this end, among other measures, alignment between teams and activities in all jurisdictions in which the Group operates is encouraged at all times in relevant aspects of the policies, procedures, and controls defined in the area of Human Rights.

Similarly, due diligence obligations are integrated throughout the value chain.

- **Internal and external communication**

The Group adequately trains CAF Group Members and, where appropriate, Business Partners, on the controls adopted by the Group on Human Rights to align the overall corporate culture with the commitment made regarding Human Rights Due Diligence through this Policy.

Similarly, the Group reports the content of the policies, processes, and due diligence activities carried out to external bodies in a transparent manner, including the conclusions of the impact assessments of projects in which the affected parties or their representatives, or the authorities or public bodies, are concerned about Human Rights.

- **Consultations with affected groups**

The CAF Group identifies the Stakeholders to be considered at any given time with respect to specific activities that may have Human Rights impacts. In this regard, in accordance with the provisions of the UN Guiding Principles, in order to accurately assess the Human Rights implications of the group's activities, an attempt shall be made to understand the concerns of potentially affected stakeholders by consulting with them directly in a manner that takes into account language and other potential barriers to effective participation.

In cases where such consultation is not possible, Group companies should consider reasonable alternatives, such as the consulting of independent experts, including Human Rights defenders and others in civil society, as well as opting for information from reliable sources such as those identified in the first section of this Policy.

Notwithstanding the foregoing, the CAF Group will always disseminate and inform potential stakeholders on the necessary information regarding Due Diligence Subsystem, as well as the different principles, guarantees and obligations that govern its operation.

- **Monitoring and continuous improvement**

Finally, the CAF Group monitors the implementation and effectiveness of the Group's Human Rights due diligence procedures and measures in accordance with this Policy. In turn, the Group applies an approach of continuous improvement, using lessons learned from monitoring to improve procedures and measures in the future.

As a result of the need to keep the internal control framework on Human Rights updated, given the dynamic regulatory environment and applicable international standards, by means of this Policy, the CAF Group Compliance Function is empowered to approve the necessary internal implementing regulations to ensure compliance with the commitments and obligations defined in this Policy.

At the same time, in cases in which it is deemed appropriate, external advisors and experts in Human Rights are contracted to carry out the mandatory assessments of the Human Rights impacts of the value chain, as well as the effectiveness and efficiency of the controls defined in this area in the Group.

## **7. DISSEMINATION, TRAINING, AND CONSULTATION**

This Policy will be available on the CAF Group's corporate website ([www.cafmobility.com](http://www.cafmobility.com)), in a separate and easily identifiable section.

All CAF Group Members have the obligation of attending the training that the CAF Group provides on Human Rights when scheduled and the possibility and duty of diligence, where appropriate, to report or pass on any questions,



doubts, and concerns that may arise in relation to the content thereof, as well as the corresponding internal implementing regulations and practical implementation, to the CAF Group's Compliance Function. The Compliance Function shall maintain, disclose, and manage the appropriate channels for this purpose at all times.

This consultation channel is the standard and the most efficient mechanism for obtaining answers to any doubts or questions that may arise in this area. However, CAF's Internal Reporting System must be used in the event that a violation or irregularity is to be reported, with the application of the corresponding whistleblower protection guarantees, in accordance with its specific applicable regulations and as indicated in the following section.

## **8. INTERNAL REPORTING SYSTEM (WHISTLEBLOWING CHANNELS)**

All members of the CAF Group have the obligation to report behavior or conduct identified in the work or professional context that may violate the principles and parameters set out in this Policy, including any known actions or conduct that may be an indication of risk.

To do so, they must use the CAF Group's Internal Reporting System, in accordance with the provisions of the Group's Internal Reporting System Policy, by accessing this through the corporate website [www.cafmobility.com](http://www.cafmobility.com). This mechanism is also accessible to any third party outside the CAF Group for the purpose of reporting breaches of this Policy.

The CAF Group's Internal Reporting System guarantees the trust, confidentiality (including protection of the identity of the informant) and prohibition of retaliation reflected in the Internal Reporting System Policy and should be employed in good faith, based on a reasonable belief of the existence of a breach or a risk of occurrence of a breach.

Once the violation of the provisions of this Policy has been investigated and confirmed, disciplinary measures will be taken, in the labor or contractual sphere, in the commercial relations with the Business Partners that are considered proportional to the risk or damage caused.

The measures adopted from a labor perspective must comply with the applicable regulations, although without losing their forcefulness or proportionality in relation to the seriousness of the facts from which they arise as a result, and with the informing of the Workers' Legal Representation, if appropriate.

## **9. MONITORING AND CONTROL**

The Audit Committee is responsible, among others, for supervising the effectiveness of the Company's internal control and the control and risk management systems, both financial and non-financial, in general, and for supervising compliance with the Company's internal codes and the Internal Reporting System in particular.

The Compliance Function shall be the internal body with autonomous powers of initiative, vigilance, and control and competent to monitor, supervise, and control the application of this Policy, periodically evaluating its effectiveness and adopting the appropriate measures to remedy any deficiencies, reporting periodically to the Audit Committee.

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## **10. REVIEW AND UPDATE**

CAF's Board of Directors shall update the Policy when requested to do so by the Audit Committee, especially when any of the following circumstances occur:

- When the results of periodic evaluations of its own operations and actions, those of its subsidiaries, and, when related to the company's value chains, those of its established Business Relationships, make this advisable in order to monitor the effectiveness of activities to detect, prevent, mitigate, eliminate, and minimize the extent of adverse Human Rights impacts.
- When relevant regulatory changes affecting the content of this Policy are approved.
- When areas for improvement or deficiencies in the content of this Policy are detected as a result of reviews and verifications carried out in relation thereto.

## **11. APPROVAL AND ENTRY INTO FORCE**

At its meeting held on December 19, 2023, CAF's Board of Directors agreed to approve this Human Rights Due Diligence Policy, effective as of that date.

Date: 2023/12/19  
CAF's Board of Directors