

Human Rights Policy



Purpose

The purpose of this Policy is to **express our commitment to internationally recognized Human Rights in all locations in which we operate**, as well as to define the due diligence process in accordance with the United Nations Guiding Principles on Business and Human Rights and our Control Policy on Sanctions and Embargoes in Business Relationships.

In addition to complying with the legislation in force in each state, and consistent with our Code of Ethics and Conduct, we **formalize this Policy in accordance with international standards and practices** such as the United Nations Universal Charter of Human Rights, the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the Conventions that develop it, and the OECD Guidelines for Multinational Enterprises.

Similarly, our behavior conforms to the Ten Principles of the United Nations Global Compact, the United Nations General Assembly Declaration of Rights of Indigenous Peoples, and the ILO Convention 169 on Indigenous and Tribal Peoples. Our approach is also aligned with the 2030 Agenda and its contribution to the United Nations Sustainable Development Goals (SDGs) and the recommendations of the Voluntary Principles on Security and Human Rights.

Likewise, **we require suppliers and contractors to respect internationally recognized human rights throughout their supply chain**, adopting the necessary measures for their strict compliance, and we expect our partners to promote the alignment of their own policies with this Policy.

Our Commitments

Regarding our stakeholders:

Employees

- **Reject any discrimination** based on gender, sexual orientation, ethnic origin, religion, age, disability, or any other distinction of the person.
- **Reject any form of harassment**, forced labor, and any form of labor exploitation, especially child labor, promoting decent employment.
- Respect **freedom of association**, the right to **collective bargaining**, and the exercise of **union activities**.
- To ensure **occupational health and safety, and a healthy environment**, complying with legal requirements, adopting the relevant standards and procedures, and promoting a culture of safety.

Suppliers

- Value in the **approval process** that they have their own policy on human rights or that they have adopted the principles of the Global Compact.
- Require the supply chain to endorse the **Cepsa Supplier Code of Ethics**.

Customers

- **To render services and safe products** and offer relevant information about them.
- Reject any type of discrimination and guarantee the **right to privacy**, protecting and making appropriate use of the personal data provided.

Local and indigenous communities

- Recognize their **social, economic, and cultural rights**, ensure the protection of their property, land use, socio-cultural identity, customs and traditions, institutions and natural heritage.
- Encourage their **participation through effective and culturally appropriate communication mechanisms**, and promote collaborative alliances to foster their socioeconomic development.
- **Establish practices for the free, prior and informed consultation** of members and representatives of indigenous communities, facilitating their participation and **informed consent**, when the country's regulations assign this process to companies.

The current version of this Policy has been approved by the Cepsa Board of Directors on May 19, 2023 and is effective from the moment of its approval.

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Our Commitments (cont.)

- **Consider possible alternatives for projects** to avoid the relocation of indigenous communities away from their traditional or historic lands in use.

In general, we are committed to act in accordance with a **due diligence process** which involves:

- o **Identify and assess** actual or potential **adverse** impacts human rights impacts as a result of our activities and those of our partners, suppliers, and contractors.
- o Implementing impact **prevention and mitigation** measures and develop **remediation** actions to provide an effective remedy if impacts have occurred.
- o Having **communication channels** and **whistleblower and complaint mechanisms** in place to report any non-compliance (cepsa.com, Integrity Channel: cepsa.ethicspoint.com, local social management teams).
- o Monitoring the **implementation and effectiveness** of the measures adopted, **periodically evaluate the due diligence system** and **incorporate the results into the process** for improvement.
- o **Communicating measures in place** to address adverse impacts (policies, processes, due diligence).
- o **Promoting training actions** to foster a culture of respect for human rights among our professionals, suppliers and other groups, such as security personnel.

Scope of Application

This Policy applies to Cepsa, the Group's subsidiaries where effective control is exercised, their directors and employees, and to third parties with whom there are legal relationships and who have adhered to it.

Additionally, persons acting as representatives of the Group in companies and entities not belonging to the Group, or where our Company does not have effective control, shall promote, to the extent possible, the implementation of principles and guidelines consistent with those set forth in this Policy