



CIE Automotive

Human Rights Policy

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1. Introduction

The Human Rights Policy of CIE Automotive, S.A. ("**CIE Automotive**" or the "**Group**", interchangeably) formalises, in a manner consistent with the Code of Conduct and with the ten principles of the United Nations Global Compact (<https://www.unglobalcompact.org/>), its commitment in this area.

CIE Automotive bases its definition on the International Bill of Human Rights and also:

- ✓ The International Employment Organisation Declaration on Fundamental Principles and Rights at Work.
- ✓ The OECD Guidelines for Multinational Enterprises.
- ✓ The OECD Due Diligence Guidance.
- ✓ The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

2. Objectives and scope

CIE Automotive believes that companies and organisations, both in the public and private sector, should be committed to respecting human rights and, therefore, agrees to respect them in all its activities and apply them not only to people employed by the Group, but also to customers, suppliers, as well as the communities surrounding its facilities, including indigenous people.

The objective of this policy is to minimise the risk of violating human rights by establishing due diligence principles and guidelines in relation to human rights that allow it to identify, prevent, mitigate and remedy potential negative impacts. Consequently, the actions of CIE Automotive must include:

- ✓ Establishing **commitments**.
- ✓ Assigning **responsibilities**.
- ✓ **Correcting** errors and bad practices.
- ✓ **Training** on the matter.

The Human Rights Policy of CIE Automotive applies to CIE Automotive, S.A. and its subsidiaries in relation to all Group activities, regardless of where in the world they are carried out.

3. Commitments

CIE Automotive carries out all its activities with respect for human rights and agrees to:

- ✓ **Avoid discriminatory practices.**
CIE Automotive agrees to ensure that the working environment is free of discrimination based on gender, race, ethnicity, religion, age, disability, political or union affiliation, sexual orientation, nationality, marital status or socio-economic status.
- ✓ **Reject the use of forced and child labour.**
CIE Automotive agrees to ensure that there are no incidents of forced labour or child labour in its activities. In this connection, CIE Automotive will ensure that its procurement policies establish measures for preventing and controlling the legal working age in accordance with the standards of the International Employment Organisation or the legislation applicable when the latter is more restrictive. In addition, it agrees to comply

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with employment law in countries where it operates and, where applicable, to implement corrective measures.

✓ **Offer decent employment.**

CIE Automotive agrees to remunerate its employees in a dignified manner, consistent with their skills and knowledge. Likewise, CIE Automotive agrees to comply with employment law in all areas where it operates to guarantee its employees' right to rest, regardless of the legal framework in force and, to the extent possible, to establish measures aimed at establishing flexible schedules.

✓ **Protect peoples' health.**

CIE Automotive agrees to offer its employees a safe and healthy working environment, strictly complying with the applicable legal requirements related to occupational health and risk prevention.

✓ **Facilitate collective bargaining and freedom of association.**

CIE Automotive respects its employees' right to right to associate freely and bargain collectively. The Group will facilitate, to the extent possible, the gathering of its employees so that they can freely discuss matters relevant to their employment.

✓ **Promote a culture that respects human rights and raise awareness among CIE Automotive employees on these matters.** Particularly in places where there is an increased risk of these rights not being recognised.

✓ **Foster a commitment to human rights throughout the value chain.**

CIE Automotive will disseminate its commitment to human rights throughout its value chain. Likewise, CIE Automotive agrees to disseminate this policy to suppliers, contractors, collaborating companies and customers, promoting and incentivising the various components of the value chain to implement their own policy in relation to this matter and, if they do not have one, to adhere to CIE Automotive's policy.

✓ **Respect for indigenous communities and traditional ways of life.**

CIE Automotive agrees to provide resources so that its activities do not negatively impact the traditional ways of life and work of the people who live in the areas where it operates. In accordance with Convention 169 - Indigenous and Tribal Peoples Convention (1989) of the International Employment Organisation and the Declaration on the Rights of Indigenous Peoples (2007), indigenous communities are entitled to participate and to be consulted in advance regarding the performance of the activities. In this connection, if the authorities have not carried out the corresponding prior, free and informed consultation, CIE Automotive will open a dialogue with the representatives of the communities to reach an agreement. If this is not possible, CIE Automotive will report publicly regarding its decision and the steps taken.

✓ **Contribute to fight against corruption and the protection of privacy.**

CIE Automotive condemns **corruption** in all its forms and has procedures and tools to prevent its activities, directly or indirectly, from inciting or encouraging corruption, in accordance with that established in its Code of Conduct, and in its Anti-Corruption Policy. In addition, CIE Automotive will guarantee the right of all people related to the Group to the privacy of their personal data.

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4. Compliance with this policy and its obligations

CIE Automotive will publish this Policy so that its contents may be known and compliance herewith can be evaluated by the various stakeholders.

In relation to this policy's implementation and monitoring compliance herewith, the following items should be noted:

4.1 Alignment with the Code of Conduct

The Code of Conduct of CIE Automotive is obligatory for all directors, executives, employees and workers of all the companies that compose CIE Automotive, without exception.

The values that guide the activities of CIE Automotive are entirely in keeping with the commitments undertaken by the Group in this policy, highlighting the following:

- ✓ Respecting people's capacity for initiative, creativity and innovation, participation and teamwork.
- ✓ Responsibility and integrity of people in their commitment to a job well done.

4.2 Notification of breaches

Employees of the CIE Automotive are required to report any potential breach of the obligations contained in this policy of which they are aware, as well as of the other directives and rules of conduct established in the Code of Conduct and may do so anonymously if they so desire. Any communication received will be treated with the utmost confidentiality and the Group guarantees that the reporting party will not be subject to any retaliation. People who are not employees of the Group who observe potential bad practices in this area may also report them.

The Company has a whistle-blowing channel for the purpose of receiving notifications related to irregular behaviour or activities that allow everyone who forms part of the Group to send, in an entirely confidential manner, any query regarding these and other matters.

The whistle-blowing channel, which is managed by the Compliance Department, has its own regulations and protocol for analysing the reports received.

Once analysed, all communications received will be reported to the Corporate Social Responsibility Committee.

4.3. Commitment

CIE Automotive expects all Group employees to demonstrate a high level of commitment to complying with this policy. Any breach may give rise, where applicable, to the corresponding disciplinary measures.

Thus, CIE Automotive will include respect for human rights in the assessment of the investment projects and in the social and environmental impact analyses, as well as in the due diligence processes, prior to formalising collaboration agreements, in which its counterparties' human rights policies and practices will be assessed.

Issued and reviewed: Corporate Social Responsibility Committee	Approved: Board of Directors	Date: October 2019
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5. Supervision and review

On an annual basis, CIE Automotive will report on the steps taken to implement the policy, in accordance with GRI indicators.

The content of this policy will be reviewed with the frequency indicated by the Corporate Social Responsibility Committee and the Board, to ensure that CIE Automotive follows best practices in relation to this matter.