

HUMAN RIGHTS POLICY

ATI Consult





1. Introduction

Within its field of activity, as an engineering company that wishes to promote sustainable, fair and inclusive development, Asistencias Técnicas de Ingeniería Consultores, S.L. (hereinafter ATI Consult) undertakes to play a leading role in the protection and promotion of Human Rights.

ATI Consult has developed this Human Rights Policy to help identify and promote positive impacts and minimise negative impacts on people throughout its value chain.

The Human Rights Policy of ATI Consult (hereinafter, "the Policy") is based on the United Nations Guiding Principles on Business and Human Rights (John Ruggie Principles) and on the following International Human Rights conventions and commitments:

- United Nations Universal Declaration of Human Rights.
- United Nations International Covenant on Economic, Social and Cultural Rights.
- United Nations International Covenant on Civil and Political Rights.
- United Nations Global Compact.
- Organisation for Economic Cooperation and Development Guidelines for Multinational Enterprises.
- International Labour Organisation (ILO) Core Conventions.
- United Nations Convention on the Rights of the Child (CRC).
- United Nations Convention on the Rights of Persons with Disabilities (CRPD).

This Policy is part of ATI Consult's commitment to ethical conduct already included in its Code of Ethics and Legal Compliance and in other Corporate Policies that directly or indirectly protect people's fundamental rights.



2. Objective and scope

The objectives of the Policy are summarised as follows:

To define the specific commitments that ATI Consult makes at a global level in relation to the respect and promotion of Human Rights directly or indirectly affected by the company's operations in the communities in which it operates.

To establish the general principles necessary to ensure that these commitments are included in the business model and in the management of the company's operations.

With regard to the **Scope**, this Policy applies to all members of ATI Consult and therefore all professionals are required to know, understand and comply with the provisions contained in this Policy, especially those professionals who, due to their position of responsibility, manage teams or have the power to make decisions, enforce them or influence others.

The fact that ATI Consult operates in various countries means that the company has to coexist with a great diversity of legal systems and working and socio-cultural environments. For this reason, this Policy and its implementation will respect the legal frameworks in force in the countries where the company operates and will serve as an inspiration to act beyond the legal requirements in those countries with less demanding regulatory frameworks.

These commitments are also applicable to representatives, suppliers and other third parties who provide services for ATI Consult or who, in any way, act on behalf of ATI Consult, such as partners, intermediaries or subcontracted companies, regardless of the territory in which they carry out their activity (hereinafter referred to as "collaborator(s)").



3. Principles of action

ATI Consult adopts and promotes the following basic principles that should govern its actions in accordance with the United Nations Guiding Principles on Business and Human Rights:

- Establish specific commitments on Human Rights and put them into practice by including them in the company's business model and operations.
- Apply Human Rights due diligence criteria to identify potential impacts on people's rights that the operations and activities carried out by the company may cause directly or through a third party.
- Develop mechanisms to prevent and mitigate risks to Human Rights, and to redress negative impacts should they occur.
- Promote a culture of respect for Human Rights and the awareness of professionals in this respect wherever ATI Consult operates.
- Encourage employees, and in particular suppliers, to share the commitment to ensure that ATI Consult respects and promotes Human Rights wherever it operates.
- Proactively collaborate with stakeholders to identify the most significant Human Rights issues and include relevant Human Rights risks in the risk map, monitoring system and internal audit system.
- Establish a mechanism for the internal monitoring of Human Rights commitments.



4. Our Commitments

4.1 Commitment to professionals

ATI Consult undertakes to offer fair and dignified working conditions and remuneration and to respect and promote the rights of all professionals in accordance with the ILO Declaration on Fundamental Principles and Rights at Work, regardless of the area in which it operates.

ATI Consult has internal policies and processes to encourage respect for labour rights, prevent discriminatory practices and promote a respectful and motivating work environment.

These commitments are mainly focused on:

- Promoting diversity, inclusion and equal opportunities, contributing to the well-being of professionals and their families by fostering a safe, diverse and inclusive working environment. Equal opportunities, diversity, respect for people and non-discrimination (race, sex, age, language, religion, disability, sexual orientation, opinion, origin, economic position, birth, trade union membership or any other personal/social condition or circumstance) are established as a basic principle of action in the company.

ATI Consult rejects any form of harassment, threat or intimidation in the workplace, whether verbal, physical, sexual or psychological.

- Guaranteeing trade union rights, freedom of association, the right to strike and the right to collective bargaining, as well as promoting respect for the rights of freedom of speech of all the company's professionals.
- Establishing the appropriate measures to ensure the proper processing of the personal data of professionals with the aim of respecting their right to privacy and data protection in accordance with current legislation.
- Providing a safe and healthy workplace in all facilities, through the implementation of occupational health and safety procedures and regulations.
- Promoting local employment by offering the first job to young people in the communities in which it operates.



- Prohibition and rejection of any form of forced, slave, child or human trafficking labour within its operations. ATI Consult undertakes to respect and promote respect for Human Rights that may be directly or indirectly affected by its operations.

In order to effectively apply this commitment to its entire value chain, as recommended by the United Nations Guiding Principles, ATI Consult makes and promotes specific commitments associated with the areas of action in which it can exert the greatest influence.

4.2 Commitment to clients

ATI Consult endeavours to ensure that the designs it develops have a positive impact on people and society.

ATI Consult, following the Due Diligence recommendations proposed by the United Nations Guiding Principles, undertakes to:

- Move towards measuring the impact (direct or indirect) that the models it develops may have on people's rights.
- Develop and provide secure infrastructure and services in order to guarantee the confidentiality, integrity and availability of information, protecting it against possible attacks or unauthorised use.
- Use client and end-user information and data exclusively for the agreed purpose and safeguard it with due diligence and security, in accordance with applicable legislation.
- Continuously train and raise awareness among professionals on privacy and information security, applying these principles in their professional relations, guaranteeing that they know and apply the necessary measures to protect information wherever it is stored, processed or transferred.



4.3 Commitment to society

ATI Consult undertakes to:

- Promote human rights in the communities in which it operates.
- Interact in a transparent and ethical manner with regulatory bodies and Public Authorities, in accordance with the principles and policies contained in its Code of Ethics.
- Practice responsible taxation that contributes wealth to the communities in which the company operates and is in accordance with the tax legislation applicable in each case.
- Promote innovation and the development of products and services offered by ATI Consult that contribute to the promotion of the fundamental rights of people and society in general.

4.4 Commitment to suppliers

ATI Consult endeavours to respect and promote fundamental rights in its supply chain and therefore undertakes to:

- Implement a system of approval and monitoring with the aim of ensuring that suppliers and collaborators comply with the commitments regarding labour rights and in particular with the prohibition and rejection of any form of forced labour, slave labour, child labour or human trafficking in their operations.
- Promote the contracting of approved local suppliers who have therefore adopted the company's ethical commitments contained in this Policy, the other related Policies and the Code of Ethics.

5. Query and Whistleblowing Channels

ATI Consult provides its stakeholders with an anonymous Direct Channel as a confidential means to communicate any doubts that may arise regarding the interpretation or application of this policy and related regulations, as well as to report any irregularity or infringement detected in relation to the policy or any behaviour that affects the rights of individuals.



All communications received through this channel are treated in accordance with the principles of confidentiality, respect, integrity, privacy and security, with full respect for rights and guarantees in the process, both in the analysis and verification of the communications received and in their resolution and, when necessary, adoption of corrective measures.

6. Monitoring

The implementation and monitoring of the commitments set out in this document are based on appropriate due diligence processes.

The assessment of perceived risk, in combination with the analysis of shortcomings, allows the residual risk to be assessed and possible improvement actions to be identified.

Country-specific action plans are then developed for each country in which the company operates and an improvement plan will be centrally managed to standardise and integrate the processes and policies to be implemented locally in a comprehensive manner.

Improvement actions highlighted by the process are included in the Sustainability Plan.

Suppliers are constantly monitored on human rights issues in a way that allows us to intercept any criticalities early and take the necessary measures.