

## HUMAN RIGHTS POLICY

### 1. Object

Holaluz-Clidom, SA (hereinafter referred to as "Holaluz" or the "Company") presents the following Human Rights Policy, a set of guiding principles and structures that outline the company's commitment to promoting and respecting internationally recognized human rights across its entire value chain. This commitment involves aligning operations and procedures accordingly.

The dedication to respecting and promoting human rights is seamlessly integrated into Holaluz's culture and constitutes an integral part of the company's daily activities. This Policy reinforces the company's endorsement of the Universal Declaration of Human Rights, underlining its commitment to adhering to the ESG Policy and the Code of Ethics. These are considered essential elements that inspire the principles guiding the organization's activities.

### 2. Scope

Human Rights Policy is applicable to all companies and teams within Holaluz, irrespective of their activity or the country where they are established. Additionally, Holaluz will actively promote the understanding and implementation of this policy among the entire team, business partners collaborating with the company and other pertinent interest groups.

### 3. References

The development of this policy has taken into consideration the following **international treaties**:

1. The United Nations International Bill of Human Rights, comprising:
  - a) The Universal Declaration of Human Rights.
  - b) The International Covenant on Civil and Political Rights.
  - c) The International Covenant on Economic, Social and Cultural Rights.

2. The fundamental conventions of the International Labor Organization (ILO), including numbers 29, 87, 98, 100, 105, 111, 138 and 182, as well as the Declaration of the ILO relating to fundamental principles and rights at work.

In addition, the following **international standards and initiatives** have been considered:

1. The Ten Principles of the United Nations Global Compact.
2. The United Nations Guiding Principles on Business and Human Rights.
3. The OECD Due Diligence Guide for Responsible Business Conduct.
4. The United Nations Sustainable Development Goals (SDGs).

Furthermore, the Human Rights Policy is complemented by the following internal policies:

1. Ethical code
2. ESG Policy
3. Employee Policy
4. Sustainable procurement Policy

## 4. Guiding principles

Holaluz was founded with an inherent commitment to ESG principles. The company was established with the belief that a business can serve as a catalyst for positive global change. Consequently, all business activities are conducted with a focus on their positive impact on society, facilitating the transition to green energy and fostering long-term sustainable value creation for stakeholders. It is noteworthy to emphasize the pivotal role the company plays in advancing the energy transition and combating climate change, demonstrating a sincere dedication to both current and future generations, for which it has received various recognitions.

The respect and promotion of Human Rights are core values for Holaluz, integral to #AlwaysPeopleFirst and essential to our mission of creating a 100% renewable planet.

Below are the guiding principles that will guide Holaluz's actions regarding human rights throughout the value chain:

- **Respect and dignity:** We are committed to respecting the inherent dignity of all individuals and stakeholders with whom we interact. We do not tolerate any form of discrimination, harassment, or inhumane treatment.

- **Equal opportunities:** We ensure equal opportunities for all individuals with whom we collaborate directly or indirectly, regardless of their race, colour, gender, sexual orientation, ethnicity, religion, disability, or other protected characteristics.
- **Freedom of association:** We respect the right of the Holaluz team as well as the workers linked to our supply chain to freedom of association and to participate in legitimate union activities.
- **Child and forced labour:** We oppose child and forced labour in all its forms and are committed to complying with applicable laws and regulations in this regard, both in our own operations and in our supply chain.
- **Safe work environment:** We provide a safe and healthy work environment for the entire team, adhering with occupational safety standards and regulations and ensuring the same in the supply chain.
- **Ethnic minorities and indigenous peoples:** We commit to respecting the rights of ethnic minorities and indigenous peoples, encouraging open cultural dialogue in all our activities.
- **Environment:** We are committed to respecting the right to the healthy environment of all the communities where we operate, adopting sustainable practices.
- **Local communities:** We collaborate with local communities to respect their rights and contribute positively to their development.
- **Supply chain:** We require our suppliers and business partners to comply with ethical and human rights standards aligned with ours, evaluating them in this area.
- **Privacy and information security:** We are committed to safeguarding the privacy and security of the information of our team, clients and other stakeholders.
- **Transparency and responsibility:** We promote transparency and take responsibility for our actions, regularly evaluating our human rights performance throughout the entire value chain.

#### 4. Implementation

Holaluz is committed to allocating specific resources to ensure the effective implementation of this policy:

- **Culture:** We promote a culture of promotion and respect for human rights, undertaking actions to raise awareness among our internal and external stakeholders in this regard.
- **Due diligence:** We conduct thorough due diligence processes, periodically identifying current and potential human rights impacts linked to Holaluz, either directly or through

third parties. We prioritize these impacts and implement appropriate measures to prevent, mitigate, and, if necessary, repair them.

- **Continuous evaluation:** We regularly assess the effectiveness of our due diligence system through monitoring indicators, with a special focus on the identified priority areas of action.
- **Complaint mechanisms:** We have a Complaints Channel, established in the Holaluz Code of Ethics, serving as a mechanism for complaints and claims. It is accessible to all individuals associated with the company, whether directly or indirectly, and provides sufficient guarantees and appropriate resolution procedures.

## 5. Responsibility, dissemination, and review

The Board of Directors of Holaluz, through the Impact Team, is tasked with overseeing the effective implementation of the Human Rights Policy.

This policy will undergo periodic reviews and will be updated as necessary. To further promote awareness regarding the respect and promotion of human rights across all areas of influence, the company will develop training modules for both internal and external stakeholders.

## 6. Approval and update

This Human Rights Policy was approved by the Board of Directors of Holaluz at its meeting on December 20, 2023.