

HUMAN RIGHTS Policy



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01. Introduction

GLOBALTEC supports, respects and contributes to the protection of internationally recognised fundamental human rights, with the aim of not being complicit in any form of abuse or violation of these rights among workers, suppliers, contractors, collaborators, partners, competitors, customers, local communities and society in general.

GLOBALTEC is committed to defend the fulfilment and protection of these rights in all its activities and geographical areas where it is present, as well as to promote the adoption of these principles and values among its suppliers, contractors and collaborators.

This Policy reflects GLOBALTEC's commitment and responsibilities in relation to human rights, especially those affecting our business activity and the operations carried out by GLOBALTEC's employees.

GLOBALTEC takes into account national laws and regulations and local practices in the countries where it operates. In countries where national legislation or regulation may conflict with human rights compliance, the company is committed to establishing relevant risk control and mitigation mechanisms.

02. International References

This Policy adopts the following treaties of international and European law, which apply to its constituent principles:

1. The International Bill of Human Rights of the United Nations (UN).
 - 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 core conventions of the International Labour Organisation (ILO), as well as the ILO Declaration on Fundamental Principles and Rights at Work.
3. The UN Convention on the Rights of the Child.
4. The European Convention on Human Rights.

The most recent versions of the following business standards and voluntary initiatives have also been taken into account:

1. The principles of the United Nations Global Compact.
2. The UN Guiding Principles on Business and Human Rights: operationalising the UN framework to "protect, respect and remedy".
3. The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

Internal references

The following internal documents complement and are linked to the principles set out in this Policy:

1. The Code of Conduct.
2. The Anti-Corruption Policy.

03. Principles

Individuals' Right

GLOBALTEC respects the individuals' rights, such as the right to life, the right to recognition as a person before the law, equality before the law, the right to take part in cultural life, to benefit from scientific progress, the material and oral rights of authors and inventors, the right to private and family life and the right to privacy and to individual and collective property.

Rejection of forced or compulsory labour and child labour

GLOBALTEC rejects the use of any form of forced or compulsory labour (as defined in ILO Convention 29).

GLOBALTEC respects the children's rights and rejects the use of child labour, according to the definition of this concept that is included in the legislation in force in the country where the corresponding activities are developed and respecting, in any case, the minimum age established in the ILO Convention 138.

Privacy and communications

GLOBALTEC respects the confidentiality and the right to privacy of all persons with whom it interacts, and is committed to use all information and data in its possession in accordance with the applicable national and European data protection laws.

GLOBALTEC is also committed to ensure that all its institutional and commercial communications are non-discriminatory and respectful towards the different cultures, and to pay special attention not to negatively affect the most vulnerable audiences, such as children.

Respect for diversity and non-discrimination

GLOBALTEC rejects any form of discrimination and maintains the commitment to ensure that all its employees, both current and potential, are treated with respect towards their diversity, promoting equal opportunities, either at the beginning of the labour relationship or at any stage of its development.

Safe and healthy working conditions

GLOBALTEC is committed to ensuring that the best occupational health and safety conditions are respected in the workplace.

GLOBALTEC promotes the dissemination and reinforcement of a safety culture, developing risk awareness, and encourages responsible behaviour on the part of its employees, through information and training sessions, among other activities.

GLOBALTEC works to protect the health and safety of its employees as well as the interests of other stakeholders, especially through preventive measures.

Freedom of association and collective bargaining

GLOBALTEC defends freedom of association and the effective recognition of the right to collective bargaining. All employees have the right to join, form or participate in organisations which they deem appropriate and whose purpose is the defence and promotion of their interests.

GLOBALTEC recognises the right to representation through work units, on behalf of trade unions or other forms of representation chosen in accordance with the legislation and practices in force in the countries where it is present. In no case does the company interfere in the employees' choices.

GLOBALTEC guarantees protection against any discriminatory act aimed at undermining the freedom of association. The company defends the right to collective bargaining as a means of defining the working conditions of its employees, as well as regulating relations between the company and trade unions.

Respect for the communities where the company operates

GLOBALTEC understands that the commitment to human rights includes those people who are or could be affected by its activities, with special attention to vulnerable groups such as indigenous peoples and minorities. Therefore, within its scope of action, it respects their right to access to food, water and sanitation, energy, education, health and housing, the environment, to enjoy a clean and healthy environment as well as the right to freedom of opinion and expression and freedom of thought and religion.

GLOBALTEC respects the right of peoples to maintain and strengthen their own cultures, ways of life and institutions, and their right to participate effectively in the decisions that affect them. The company is also committed to respect and protect the minorities' rights and the communities' land rights.

GLOBALTEC recognises and respects the unique nature of the natives, tribal, aboriginal and indigenous peoples. It undertakes, in accordance with the legislation in force and with ILO Convention 169, to respect their rights, whether or not they are incorporated into the legislation of each country. In those cases where the presence of indigenous peoples is detected, the company is committed to respect their right to a process of free, prior and informed consultation.

A GLOBALTEC reconhece e respeita a natureza única dos povos indígenas, tribais, aborígenes e autóctones. Compromete-se, em conformidade com a legislação em vigor e com a Convenção n.º 169 da OIT, a respeitar os seus direitos, independentemente de estarem ou não incorporados na legislação de cada país. Nos casos em que é detectada a presença de populações indígenas, a empresa compromete-se a respeitar o seu direito a um processo de consulta livre, prévia e informada.

04. Non-compliance. Communication

When any person related to GLOBALTEC, either an employee or an external person, considers that there is a situation contrary to what is stated here, he/she can report it to the Ethics Committee.

Communications may be sent by the following means:

- By e-mail: GLOBALTEC ethical mailbox: www.globaltecingenieria.com.
- By post, to the following address:

GLOBALTEC (for the attention of the Ethics Committee)
Calle Velázquez, 10 -3º dcha.
28001 Madrid (Spain)

In the treatment of these communications, GLOBALTEC will act to protect the informants from any form of retaliation. In addition, the confidentiality of the informants' identity is guaranteed, unless otherwise provided for in the applicable legislation.

In any case where, on the basis of such a report, it is determined that there has been a non-compliance of the principles set out in this Policy, the relevant procedure set forth in the Code of Conduct will be applied.

05. Revision

This Policy will be reviewed periodically to ensure its adequacy and effective implementation. All revisions will be subject to the approval of the Board of Directors of GLOBALTEC S.A. after a report from the Sustainability Coordinator and the Sustainability Committee.

06. Communication and training

This Human Rights Policy will be distributed to all people interacting with GLOBALTEC, both internally and externally, through specific communication initiatives.

Necessary training actions will be carried out to ensure that all GLOBALTEC employees adequately understand the contents of this Policy.

07. Implementation and follow-up

In accordance with the content of the "UN Guiding Principles on Business and Human Rights: Implementing the UN 'Protect, Respect and Remedy' Framework", this document represents GLOBALTEC's public commitment to human rights with its stakeholders.

In order to apply the commitments included in this document, GLOBALTEC will establish processes to guarantee its implementation and monitoring through the action plans derived from the GLOBALTEC Sustainability Plan.

In Madrid, March 2022.



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GLOBALTEC DESARROLLOS E INGENIERÍA SA

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Technical engineering services and other activities related to technical consultancy.

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Thank you for all your support
and efforts in the fight to achieve
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