



HUMAN RIGHTS POLICY

Prepared by	Reviewed by	Approved by
Governance, Risk and Compliance, Internal Audit and Sustainability Management	Chief Executive Officer	Board of Directors



Neinor
HOMES

Control of revisions		
Revision	Date *	Description of changes
1.00	23/12/2022	Initial version of the Policy

* Date of the Committee at which the procedure is presented for approval (except in the case of immaterial changes that do not change established operations and protocols and which, in turn, are always made to increase the company's level of assurance, in which case they will be approved by the Head of Governance, Risk and Compliance, Internal Audit and Sustainability).

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"Paper copies may not be the latest version, please refer to the online documentation".

1. Introduction

The Board of Directors of Neinor Homes, S.A. (hereinafter, the "Company"), in accordance with the provisions of Article 5 of its Rules and Regulations, has the power to approve the Company's general policies and strategies, which contain the guidelines that govern the actions of the Company and of the companies that form part of the Neinor Homes Group (the "Group") whose controlling entity is, within the meaning established by law, the Company.

In the exercise of this responsibility and in the knowledge that respect for human rights is a fundamental part of the Group's purpose and values, the Board of Directors approves this Human Rights Policy (the "Policy") which has been prepared taking into account the highest international standards.

2. Purpose

The purpose of the Neinor Homes Human Rights Policy is to formalise the Group's commitment to internationally recognised human rights, to strengthen and extend the commitment established in the Company's internal regulations, as well as to define the principles to be applied by the Group for due diligence in the area of human rights.

3. Scope of application

This Policy is applicable to all companies that form part of the Neinor Homes Group, and all personnel are obliged to comply with it, irrespective of their position and role.

Likewise, the knowledge and application of this Policy will be encouraged by those persons and entities that maintain contractual and business relationships with Neinor Homes (suppliers, contractors, subcontractors and partners, among others).

4. Objectives and commitments

In order to contribute to the agenda set by the United Nations for sustainable development, Neinor Homes has adopted the Sustainable Development Goals as its own. Likewise, the Group recognises that respect for human rights, within the framework of the United Nations Guiding Principles on Business and Human Rights, is a fundamental and essential aspect for sustainable development.

In this context, Neinor Homes is committed to playing an active role in the promotion of human rights and to work proactively to respect them. This commitment entails avoiding or, where appropriate, mitigating the negative consequences on human rights of its own activities. Likewise, it will do everything in its power to prevent or mitigate the negative consequences on human rights directly related to the activities of third parties with which the Group has business relations.

This commitment, integrated into the Group's internal regulations, is based on the foundations of a corporate culture firmly rooted in the sustainability of the business model, and extends to all the Group's operations and value chain.

In particular, this Policy implements the Code of Ethics and Code of Conduct for Third Parties of the Neinor Homes Group. In addition, it is linked to the following internal regulations:

- The Sustainability Policy.
- The Sustainability Plan 2022-2025.
- The Diversity and Non-Discrimination Policy.
- The Ethical Channel Management Procedure.
- The Crime Risk Prevention Manual.
- The Compliance Function Regulations.
- The Board Regulations.
- The Audit and Control Committee Regulations.

This Policy is inspired by the following international declarations:

- The UN International Bill of Human Rights, which includes:
 - 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.
- The fundamental Conventions of the International Labour Organisation (hereinafter referred to as the "ILO") nos. 1, 14, 26, 29, 87, 98, 100, 105, 111, 131, 138, 155 and 182, as well as the ILO Declaration on Fundamental Principles and Rights at Work.
- The 10 Principles of the United Nations Global Compact.
- The UN Guiding Principles on Business and Human Rights.
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

Neinor Homes is also reinforcing its responsibility towards sustainability and the protection of human rights by contributing to the 17 Sustainable Development Goals of the United Nations, within the framework of the 2030 Agenda for Sustainable Development.

The principles included in this section take into account their relevance to our business activities and relationships. We are committed to respecting these principles in all areas where we operate, taking into account local cultural, social and economic diversity, requiring each of our stakeholders to behave in accordance with these principles, with particular attention to high-risk or conflict-affected contexts.

4.1 Human rights at work

4.1.1 Rejection of forced or compulsory labour

Neinor Homes rejects the use of any form of forced or compulsory labour and all forms of slavery and human trafficking, as defined in ILO Convention 29.

Neinor Homes has been a signatory to the United Nations Global Compact since 2021 and as such adheres to Principle 4, which states that companies must support the elimination of all forms of forced and compulsory labour.

4.1.2 Rejection of child labour

Neinor Homes considers children and underage workers to be a group at risk, and therefore pays great attention to respecting their rights throughout the value chain of its activities.

Neinor Homes rejects the use of child labour, in compliance with the provisions of ILO Convention 138 in accordance with the minimum age of the legal framework of the country concerned.

4.1.3 Rejecting discrimination and embracing diversity

Neinor Homes rejects any form of discrimination, respecting the diversity of its employees and providing equal opportunities in access to employment and professional promotion. No person employed by the Group shall be subject to discrimination on the grounds of race, ethnic origin, disability, illness, religion, marital status, sexual orientation, political opinion, age, nationality, gender or for any other reason.

Furthermore, contractors and suppliers shall not apply any discriminatory practices in the recruitment, remuneration, access to training, promotion, termination or retirement of their employees.

4.1.4 Respect for freedom of association and collective bargaining

Neinor Homes recognises the right of its employees to form part of, participate in or join trade unions or organisations aimed at defending and promoting their interests, regardless of the area in which their operations are carried out. It also guarantees respect for collective bargaining, freedom of opinion among its employees and the protection of workers' representatives.

4.1.5 Protecting the health and safety of workers

Neinor Homes believes that the health, safety and psychological, relational and physical well-being of people is the most precious asset to be protected at all times in life, at work, at home and in leisure time.

All Neinor Homes employees carry out their work in safe and healthy places, with the Company guaranteeing this working environment for its employees through the adoption of procedures and standards in matters of occupational health and occupational risk prevention, complying with the requirements established in the applicable legislation.

Neinor Homes' contractors and suppliers will also provide their employees with a safe and healthy workplace.

4.1.6 Fair, just and favourable conditions of work

Neinor Homes treats its employees fairly and justly, with dignity and respect, and pays its workers in accordance with the applicable legal rules, including minimum wages, overtime and social benefits. Weekly working hours and overtime shall not exceed the established legal limit. Overtime shall always be voluntary and paid in accordance with the law.

Neinor Homes shall establish the necessary conditions to ensure that its employees enjoy these rights, in accordance with ILO Conventions or applicable legislation.

Neinor Homes guarantees that its employees will enjoy a working environment free of any form of harassment, intimidation or violence in any of its manifestations. Thus, it prohibits any form of physical, sexual, psychological or verbal harassment or abuse of its employees, as well as any other conduct that could create an intimidating, offensive or hostile working environment.

4.2 Non-labour human rights

4.2.1 Right to the environment and water

Neinor Homes believes that the challenge of climate change is the biggest obstacle to people enjoying their rights.

Neinor Homes will comply with the environmental legislation applicable to its activities, as well as other obligations that may be established, with a special effort to prevent pollution and minimise, as far as possible, the potential environmental impact generated by its supply chain, both on natural resources and on people. The fundamental principles of our Sustainability Policy and our Environment, Quality and Innovation Policy attest to our commitment:

1. To promote sustainable building through certification of developments.
2. To boost the circular economy through sustainable projects and construction processes that use the best available techniques and prioritise the use of recycled and reused materials and the extending of the useful life of resources.
3. To reduce the consumption of resources such as energy, water and materials by setting and meeting specific targets.
4. To reduce the impact of the Group's offices on the environment.
5. To promote actions to mitigate climate change and progressively reduce the company's carbon footprint.
6. To promote the minimisation of the Group's environmental impact in construction processes.
7. To provide regular training on the environment and on sustainable building.
8. To promote awareness in society of the need to respect the environment.

This goes hand-in-hand with the Group's commitment to reduce direct and indirect greenhouse gas emissions and resource consumption, to enable the achievement of global warming targets in line with the Paris Agreement and to contribute to the achievement of the UN Sustainable Development Goals.

4.2.2 Respecting the rights of minorities and communities

Neinor Homes is committed to respecting the rights of local communities in the areas where it operates, respecting local laws, culture and customs, engaging in open dialogue with stakeholders and paying particular attention to the most vulnerable groups.

Neinor Homes is aware of the influence, including indirectly, that its activity could have on the communities in which it operates, which is why social commitment to the community and the city is one of the areas of action of its Sustainability Plan 2022-2025.

In designing and implementing development projects, it undertakes to give due consideration to its environmental and social impact, its environmental footprint and the respect for human rights in the area where the project is planned.

It also works with suppliers, contractors and partners who respect human rights and contribute to the socio-economic development of the communities in which the Group

operates. It does so by, among other methods, promoting social inclusion measures (local workforce, health and safety training, in collaboration with local organisations, etc.).

4.2.3 Contributing to the fight against corruption

Neinor Homes is committed to working against corruption, both directly and indirectly, in all its forms, including extortion and bribery, in accordance with Principle 10 of the United Nations Global Compact.

To this end, it reiterates its commitment to "zero tolerance" towards corruption, which is one of the principles of the Code of Ethics and the Group's Anti-Corruption, Fraud and Bribery Policy. Furthermore, Neinor Homes has a crime risk prevention and compliance model to avoid the commission of irregular or illicit conduct related to any type of corruption.

4.2.4 Right to privacy

Neinor Homes respects the right to privacy and intimacy of all persons with whom it interacts and will make appropriate use of the personal data and information collected, taking special care in relation to the data of its employees and customers.

4.2.5 Right to health

Neinor Homes is committed to taking all necessary actions to ensure that its products do not undermine the health and safety of its customers.

4.2.6 Right to freedom of opinion, information and expression

Neinor Homes undertakes to respect and promote, within its scope of action, the right to freedom of opinion, information and expression, respecting diversity of opinions and encouraging reciprocal communication with its stakeholders.

4.2.7 Right to security of the person

Neinor Homes is committed to ensuring the safety of the people with whom it interacts in all areas.

The private security forces with which it has a relationship shall act in accordance with the applicable legislation and with respect for human rights.

5. Principles for action

In order to achieve the aims and commitments of this Policy, the Group assumes and promotes the following principles for action that will govern its actions in all areas:

- To identify the potential impacts that operations and activities carried out by the Group, directly or through a third party, may have on human rights;
- To have a due diligence system in place that identifies situations and activities with the highest risk of human rights violations, with the aim of developing mechanisms to prevent and mitigate such risk, as well as to redress impacts should they materialise;
- To periodically assess the effectiveness of the due diligence system by means of monitoring indicators, with a special focus on those centres of activity where there may be a greater risk of human rights violations. This assessment will be supported by the Group's internal control systems;

- To communicate the result of the assessment of the effectiveness of the due diligence system in the annual public information available on the Company's corporate website;
- To promote a culture of respect for human rights and actions aimed at raising awareness of human rights among professionals in all Group companies;
- To have whistle-blowing and grievance mechanisms in place, with sufficient guarantees and appropriate resolution procedures, to deal with potential cases of human rights violations. These mechanisms must be sufficiently communicated, both to the Group's professionals and to persons and organisations outside the Group. To this end, adequate internal reporting procedures shall be defined for the matters communicated, with the aim of making it possible to evaluate the due diligence systems; and
- To take the appropriate measures as soon as possible in the event of detecting a violation of human rights on the Group's premises or those of its suppliers, and to inform the competent authorities so that they may take the appropriate action when such violation may constitute an administrative, criminal or any other type of offence.

6. Relationship of Neinor Homes' stakeholders with human rights

In order to achieve the aforementioned commitments, the following principles are applicable in the relationship between Neinor Homes and its stakeholders:

- **Employees:** Neinor Homes is committed to respecting all the human and employment rights of its employees and in particular those established as fundamental as defined in the ILO Conventions. Likewise, Neinor Homes in turn demands strict respect for human rights from all the Group's professionals and encourages their promotion.

Neinor Homes' commitments to its employees are set out in its Code of Ethics and are developed in internal rules and procedures.

- **Suppliers:** All suppliers working with Neinor Homes must commit to respecting the human and employment rights of all their employees, as well as to involving and transmitting these principles to their business partners.

The Third Party Code of Conduct establishes the obligation of respect for human rights principles and values by all its suppliers.

- **Business partners:** Neinor Homes' business partners must respect and promote internationally recognised human rights in the development of their activities. In this regard, Neinor Homes will do everything in its power to promote this compliance. For these purposes, business partners are considered to be companies in a business relationship with Neinor Homes through the creation of any form of joint venture.
- **Customers:** Neinor Homes respects the human rights of customers, committing to communicate with them in a clear and transparent manner and to provide products and services that are safe and secure. Neinor Homes is committed to offering its customers a high standard of excellence, quality, health and safety in its products.

The Group rejects any kind of discrimination against its customers and will at all times respect their right to privacy, protecting and making correct use of their personal data.

- **Community:** Neinor Homes encourages and fosters the promotion of human rights in the local communities in which it operates.

7. Responsibilities

The different responsibilities for ensuring compliance with the Human Rights Policy are detailed below.

The Board of Directors is the main promoter of the implementation of a culture of respect for human rights throughout the Company, and this policy has the express commitment of the Senior Management, including the Management Committee and the Chairman of Neinor Homes.

Human Resources Management is responsible for ensuring compliance with and application of the policy, as well as for its periodic review, in collaboration with management of the other departments that make up Neinor Homes. For its part, Governance, Risk and Compliance, Internal Audit and Sustainability Management will periodically review and report on compliance with the Human Rights Policy guidelines.

8. Monitoring and control

The companies of the Group shall adopt the necessary control mechanisms for the correct implementation, monitoring and evaluation of the Human Rights Policy. Likewise, they shall dedicate adequate and sufficiently qualified human and material resources for such purposes.

The Governance, Risk and Compliance, Internal Audit and Sustainability Management, for its part, will periodically review compliance with the guidelines set out in this policy.

Neinor Homes has an ethical channel, available to all its stakeholders, including employees, suppliers, customers and other third parties, through which they may communicate any doubts or suggestions, as well as report conduct contrary to this Policy.

In the event of a breach of any of the commitments or principles set out in the Policy, Neinor Homes will take the appropriate measures, in accordance with the legislation in force.

Any communication may be sent by letter or via the corporate website at any time, as the channel is available 24 hours a day, 7 days a week.

In the case of ordinary post, the address will be:

NEINOR HOMES

Head of Governance, Risk and Compliance, Internal Audit and Sustainability
Paseo de la Castellana 20, planta 5ª
28046 - Madrid

In the case of the corporate website, the link is <https://neinorhomes.com/en/responsible-business-and-innovation/ethics/ethics-line/> where the address of the channel for handling complaints in accordance with Directive (EU) 2019/1937 is indicated, guaranteeing the confidentiality of the parties and allowing anonymous communications to be sent when the informant so wishes: <https://neinorhomes.integrityline.com/frontpage>.

9. Training and dissemination

This Policy is included among the mandatory annual training materials for all members of Neinor Homes, both in Spanish (local language) and in English. It will also be included in the welcome pack for new employees of the Company.

Likewise, the Policy will be accessible on the intranet, common directories of Neinor Homes and will be made public on the Company's corporate website, both in Spanish and English.

10. Entry into force and effectiveness

This Human Rights Policy comes into force as of its approval by the Board of Directors of Neinor Homes on 23 December 2022.

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