

# AIRTIFICIAL | Human Rights Policy

Approved by the Board of Directors on 6<sup>th</sup> September 2023



## Human Rights Policy

Reference	A_POC-06
Title of the Standard	Human Rights Policy
Summary of the Standard	Commitment to compliance with and respect for international human rights standards in order to identify, prevent or mitigate human rights violations.
Scope	Airtificial Group
Category	Policy
Responsible	
Date of approval	September 6, 2023
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Affects	Not applicable
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## 1 Introduction

In accordance with the provisions of the Universal Declaration of Human Rights, all human beings are born free and equal in dignity and rights and, endowed as they are with reason and conscience, should behave towards one another in a spirit of brotherhood.

Likewise, the aforementioned Declaration determines that no one shall be held in slavery or servitude, slavery and the slave trade are prohibited in all their forms, nor shall they be subjected to cruel treatment or punishment.

Finally, among other attributions, the Declaration itself emphasizes that all men have the right to work, to rest and to decent remuneration.

All these principles, related to human rights, are included in the different policies and in Grupo Artificial's Code of Ethics, so that people are one of the strategic axes of the company, considering them as its greatest asset.

It is also a fundamental purpose of Grupo Artificial to obtain the same degree of respect and protection for people in all its subsidiaries located across three continents and, consequently, is committed to strict compliance with the provisions of the regulations related to due diligence.

For the preparation of this policy, the various regulations issued by the United Nations have been followed, as well as all the regulations related to this issue.

Finally, in accordance with the OECD guidelines for multinationals, this policy:

- i. has been approved by the highest hierarchical level of Artificial Group;
- ii. has been prepared by external parties,
- iii. defines what is expected of personnel, business partners and other parties directly associated with its activities, goods or services, in terms of human rights;

- iv. is publicly disclosed and communicated internally and externally to all personnel, business partners and other stakeholders; and
- v. will be translated into operational policies and procedures that give a concrete dimension to these commitments.

## 2 Policy recipients

The roles and responsibilities for the prevention and detection of any violation related to human rights are described below:

- a. The company's senior management is the body responsible for defining the Human Rights Protection Policy and for promoting a culture of compliance and ethical behavior within the company, communicating the importance and responsibility of all managers, employees and collaborators in the process of prevention and detection of events that may lead to the violation of human rights, guaranteeing the necessary resources to ensure compliance with the objectives of the policy.
- b. The Chief Compliance Officer (CCO) is responsible for analyzing the complaints reported through the complaints channel, guaranteeing the confidentiality and security of the information and reporting to the Audit Committee in order to determine the corrective, preventive or disciplinary actions to be proposed to the Board of Directors.
- c. The Audit Committee is also responsible for evaluating the effectiveness of and compliance with the Human Rights Protection Policy through review and monitoring mechanisms, as well as managing and supporting the implementation of any necessary updates.
- d. The managers of each area are responsible for knowing and understanding the Human Rights Protection Policy, the actions that may cause its violation, for executing the controls under their responsibility, reporting suspicious incidents and cooperating with the investigations that may arise from it.

e. Employees are equally responsible and must refrain from acts that, in contravention of the policy developed herein, may directly or indirectly violate human rights.

### 3 Policy objectives

#### 3.1 Make respect for human rights a central element of the company's strategies.

Respecting people and the planet by preventing and addressing negative impacts in business activities and value chains is the most significant contribution that most companies can make to sustainable development.

The three pillars of the UNGPs<sup>1</sup>-the State duty to protect human rights, the corporate responsibility to respect human rights, and the need for access to remedy for human rights harm-clearly define the respective roles of business with respect to human rights.

Performances:

- ✓ Be able to demonstrate human rights due diligence and effective engagement, where appropriate, with trade unions and other affected stakeholders, as well as grievance management in just transition planning.
- ✓ Integrate human rights due diligence into the corporate commitment to the Sustainable Development Goals (SDGs).
- ✓ Exercise continuous review.

#### 3.2 Intensifying collective action to address systemic challenges that may affect human rights

Collective action is an essential part of the solution to the systemic challenges that are at the root of many business-related human rights impacts.

Performances:

- ✓ Address discrimination and abuses related to gender, race, religion and ideology in the workplace and in the context of investments affecting communities.
- ✓ Strengthen the focus on the role of responsible business in contexts affected by conflict and other situations with a higher risk of international crimes and serious human rights violations.
- ✓ Addressing corruption (e.g., practiced through bribery and influence peddling for illegal economic advantage) that leads to systemic, business-related human rights violations in various types of business activities.
- ✓ Managing the threats posed by new technologies to human rights and humanity.

#### 3.3 To follow up and apply the different regulations that are being issued more and more frequently at national and international level

Performances:

- ✓ Require Airtificial Group to identify, prevent and mitigate their negative consequences and be accountable for the way they are addressed.
- ✓ Review and implement mandatory measures.
- ✓ Participation in forums.

#### 3.4 Incorporating human rights due diligence in corporate governance and business models

Take steps to develop a political commitment to respect human rights and ensure that they are able to demonstrate effective human rights and grievance management due diligence.

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<sup>1</sup> Guiding Principles on Business and Human Rights.

Compliance with the aforementioned paragraph implies that a company, alone or acting jointly with other entities, as appropriate, must exercise its power to convince the entity causing such negative impact to prevent or mitigate such impact.

Performances:

- ✓ Maximum involvement of the management body.
- ✓ Participate in industry and multi-stakeholder initiatives that robustly address industry's contribution to specific human rights impacts.
- ✓ Engage in support and capacity building provided to smaller suppliers and other business partners, including customers where appropriate, particularly in high-risk sectors and geographies, to develop a better understanding of human rights risks and how to manage them in line with the UNGPs.
- ✓ Exercise "enhanced" human rights due diligence when related to conflict-affected areas or other situations where atrocities are a known risk, such as in authoritarian regimes or situations of illegal occupation, and develop mechanisms for increased action when there is a risk of involvement in international crimes.
- ✓ Implement further guidance on how to strengthen respect for the human rights of individuals from groups or populations at higher risk of vulnerability or marginalization, including the gender orientation and framework of the UNGPs.

### 3.5 Fostering meaningful stakeholder engagement should be at the heart of business strategies to realize legitimate and effective responses when addressing human rights risks and impacts in a business context

Airtificial Group must see as partners affected people and communities, trade unions, human rights and environmental defenders, civil society organizations and other groups that play an essential role in monitoring the practices of the State and companies.

Performances:

- ✓ Demonstrate how to engage stakeholders in their human rights due diligence and remediation processes, especially in tracking the effectiveness of any actions taken, with particular attention to gender-related risks and for those who may be at greater risk of vulnerability.
- ✓ Meaningfully consult with relevant stakeholders about their needs and expectations when designing and reviewing grievance processes.
- ✓ Publicly support open civic space and recognize that it is good for human rights due diligence, good governance and sustainable business (and development).
- ✓ Address retaliation against trade union representatives, human rights and environmental defenders and other groups speaking out against business-related human rights concerns, committing to zero tolerance of such violations in their value chains and refraining from any actions or other forms of retaliation.

### 3.6 Promote best business practices in the area of ESG.

Sustainability is based on ensuring the needs of the present without compromising the needs of future generations, always without sacrificing environmental protection, economic growth and social development.

Performances:

- ✓ Ensure greater transparency and accountability in the human rights conduct of private capital market actors, including private equity firms.
- ✓ Adopt internal human rights processes, incorporate human rights due diligence and develop grievance management approaches in line with the UNGPs in their own governance frameworks and investment decision-making process.

### 3.7 Systematic monitoring in relation to respect for human rights

Advancing effective implementation in general requires knowing where progress is being made and where gaps remain, as well as knowing what works and what does not.

Performances:

- ✓ Evaluate the implementation of the United Nations Guiding Principles on Business and Human Rights.

## 4 Scope of application

This Policy is applicable to Airtificial Group, its business units and subsidiaries of the Group where effective control is exercised, the directors and employees of the same, and third parties with whom there are legal relationships and who have adhered to the same.

On the other hand, persons acting as representatives of the Group in companies and entities not belonging to it, or where our Company does not have control

The company shall, to the extent possible, promote the implementation of principles and guidelines consistent with those set forth in this policy.