



POLICY OF RESPECT FOR HUMAN RIGHTS

S **solunion**
SOMOS IMPULSO

POLICY OF RESPECT FOR HUMAN RIGHTS



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1.

OBJECT

In the exercise of its responsibilities, and aware that **respect for human rights is a fundamental part of the Solunion Group's purpose and values** and an aspect inextricably linked to the United Nations 2030 Agenda for Sustainable Development, the Board of Directors approves this Policy of Respect for Human Rights, which has been drawn up considering the highest international standards.

The Policy of Respect for Human Rights specifies and develops **Solunion's commitment to human rights** so that they are scrupulously respected within its organization and is complemented by Solunion's Code of Ethics and Conduct and the rest of Solunion's Policies.



2. SCOPE OF APPLICATION

At Solunion we develop our activity as a socially responsible company, building relationships based on quality and trust, transparent, stable, and equitable in the environmental, social, labour and governance areas and always in collaboration with our environment. As collaborators, we are committed to our stakeholders to actively participate in the economic and social progress of all the countries in which we operate, and we understand this commitment as the tool to articulate our contribution to achieving a better world.

This Policy applies to all the companies that make up the Solunion Group and to all Solunion employees, as well as to those who hold management positions or belong to the administrative bodies of the Group's companies and to those who, because they maintain a close or permanent collaboration relationship with Solunion, adhere to or are subject to compliance with the principles contained in this Policy as a result of the nature or purpose of their activities.

In addition, Solunion will ensure that suppliers, contractors and third parties who maintain professional relationships with Solunion are aware of and respect the principles regulated in this Policy.



3.

BASIC PRINCIPLES OF ACTION

Solunion's commitment to respect human rights is inspired by the following international declarations and standards:

The **International Bill of Human Rights** of the United Nations.



The **10 Principles of the United Nations Global Compact**.



The **Women's Empowerment Principles**.



The United Nations **Guiding Principles on Business and Human Rights** (UNGPs).



The **Organisation for Economic Co-operation and Development (OECD) Guidelines** for Multinational Enterprises on Responsible Business Conduct.



3 BASIC PRINCIPLES OF ACTION

Convention on the Rights of the Child.



The Principles for Insurance Sustainability (PSI).



Fundamental Inter-American Criteria on Business and Human Rights.



The OECD and G-2 Inclusive Framework (IF) on BEPS.



United Nations Principles of Conduct to address discrimination against lesbian, gay, bisexual, transgender and intersex (LGBTI) people in business.



The principles and rights established in the main conventions of the International Labour Organization (ILO), such as the ILO Declaration on Fundamental Principles and Rights at Work, the International Labour Organization's Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy, etc.



The United Nations Principles for Responsible Investment (PRI).



National Action Plans on Business and Human Rights.

In addition, **respect for human rights is present in each of the Sustainable Development Goals of the United Nations 2030 Agenda, to which Solunion is publicly committed**, which is based on prosperity, the planet and people as essential pillars for sustainable development.

Based on the above, Solunion is committed to guiding its actions on the basis of the following principles:



Reject discriminatory practices or practices that undermine the dignity of persons because of their age, gender, marital status, nationality, religion, disability, race or ethnicity, or any other personal circumstance.



Reject child labour and forced or compulsory labour.



Respect freedom of association and collective bargaining.



Implement supervision and control procedures to identify, with due diligence, possible situations of risk of human rights violations, and establish mechanisms to prevent and mitigate such risks and, where appropriate, repair any negative impacts that may have materialized.





In order to achieve the aforementioned objectives and commitments, **the Group assumes and promotes the following basic principles** that must govern its actions in all areas:

Have a due diligence system that identifies the potential impacts that the operations and activities carried out by the Group, directly or through a third party, may have on human rights.



Develop mechanisms to prevent and mitigate the impacts identified, prioritizing those that require immediate attention due to their seriousness.



Periodically evaluate the effectiveness of the due diligence system by means of monitoring indicators, with a special focus on those activity centers where there may be a greater risk of human rights violations. This evaluation will be supported by the Group's internal control systems.



Identify stakeholders in accordance with environmental and social sustainability standards.



Develop mechanisms to repair (or contribute to the repair) of the negative consequences that, where appropriate, the activity of Group companies has caused or contributed to cause.



Communicate the result of the evaluation of the effectiveness of the due diligence system in the annual public information, available on the corporate website.

Have whistleblowing 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 people and organizations 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.



Promote a culture of respect for human rights and actions aimed at raising awareness of human rights among professionals in all Group companies.

Adopt as soon as possible the appropriate measures in the event of detecting a violation of human rights in the Group's facilities or those of its suppliers and inform the competent authorities so that they may take the appropriate action when such a violation may constitute an administrative, criminal or any other type of infraction.





4.

SOLUNION'S COMMITMENTS

We assume the following commitments:

- 4.1 | INTEGRATION OF HUMAN RIGHTS INTO OUR CORE BUSINESS
- 4.2 | RESPECT HUMAN RIGHTS AS AN EMPLOYER
- 4.3 | RESPECTING HUMAN RIGHTS IN OUR OPERATIONS
- 4.4 | PROMOTING HUMAN RIGHTS AS A CORPORATE CITIZEN
- 4.5 | COMPLAINT MECHANISMS

4.1 | INTEGRATION OF HUMAN RIGHTS INTO OUR CORE BUSINESS

As a corporate insurer and investor, **our human rights due diligence process is part of our overall ESG (Environmental, Social and Governance) approach**, which is integrated into our risk management system. We use a combination of sector and country approaches to identify human rights risks.

Our thirteen ESG guidelines for sensitive business sectors include a specific sector guideline on human rights to ensure that human rights aspects are checked as part of the overall risk assessment for insurance and investments in unlisted asset classes. We also maintain a watch list for sensitive countries where systematic human rights violations may occur. We apply a general human rights guideline for all business in those countries.



4.2 | RESPECT HUMAN RIGHTS AS AN EMPLOYER

As an employer, we apply the Universal Declaration of Human Rights in all our worldwide operations. **We have integrated the ten principles of the United Nations Global Compact into our Code of Ethics and Business Conduct.** We also adhere to the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD).

We support the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, including the ILO Declaration on Freedom of Association and the Right to Collective Bargaining.

4.3 | RESPECTING HUMAN RIGHTS IN OUR OPERATIONS

Human rights due diligence in our operations is also part of our ESG benchmarking and assessment process.

We extend our commitment to international human rights standards to our suppliers' workers and to those involved in our supply chain.

4.4 | PROMOTING HUMAN RIGHTS AS A CORPORATE CITIZEN

Through our focus on social inclusion, **we support projects and initiatives that promote human rights around the world**. Our performance in social action and volunteering aims to help address social challenges to safeguard the future of the next generations.

4.5 | COMPLAINT MECHANISMS

We make communication mechanisms available to our stakeholders in case there is evidence that Solunion has failed in its **responsibility to prevent any harm to human rights** or is involved in a human rights violation.



5.

SPECIFIC COMMITMENTS TO SOLUNION'S DIFFERENT STAKEHOLDERS

With regard to the relationship between Solunion's Stakeholders and human rights, the following aspects must be taken into account. In any case, **confidentiality and the right to privacy will be respected**, under the legally established terms, in addition to the commitment to the correct use of the data and information provided by all Stakeholders.

■ SHAREHOLDERS

Transparency in communications so that they have all relevant information on human rights to facilitate decision making.

■ CUSTOMERS

Solunion is committed to **avoid any unjustified discrimination** in the recipients of its product offerings, respecting at all times the privacy of their data and their intimacy.

SOLUNIONERS

Solunion has a set of internal **policies and regulations that guarantee the rights of its employees**. Solunion respects and promotes internally the observance of the following rights:

The right to **freedom of association and collective bargaining of Solunioners**, as well as the role and responsibilities of employee representation in accordance with the regulations of each country.

The right to a **safe and healthy work environment**.

The right to have a **work environment conducive to respect for the rights and dignity of individuals and free from harassment**, ensuring that if such conduct occurs, appropriate procedures are in place to report, address and correct it with complete confidentiality and diligence, as well as with due consideration and promptness.



The right to **data privacy and intimacy**.

The right to have **decent working conditions, with adequate remuneration and equal treatment**, preventing people from being treated in a discriminatory manner due to characteristics that are not related to their merit or the inherent requirements of the job.



■ SOLUNIONERS

Solunion will ensure that employees, within their scope of action and responsibility, **respect human rights and contribute to the fulfilment of the commitment acquired by Solunion** through this Policy. To this end, Solunion will provide its employees with training in this area.

Solunion professionals shall show strict **respect for the human rights recognized in national and international legislation in the conduct of their business in all countries in which they operate** and, in particular, shall ensure compliance with this Policy and the Group's human rights regulatory framework. All Solunioners are expected to act as a first line of defence of human rights, reporting any possible impact on human rights or any non-compliance with the Group's corporate policies.

■ SUPPLIERS

Solunion will encourage the suppliers with whom it interacts to also show strict respect for the human rights recognized in the international and national legislation of each of the countries in which they operate.

In this regard, **Solunion has approval systems that integrate the analysis of fundamental rights** and procedures to help the suppliers with whom it establishes contractual relations to assume, within the scope of their competencies, the protection of human rights.



■ DISTRIBUTORS

Solunion shall ensure that its business partners **are aware of and respect the principles and commitments** made in this Policy.

■ SOCIETY AND REGULATORY BODIES

With regard to society in general, the Group, in its operations, **must reinforce respect for the rights of ethnic minorities and indigenous peoples** in the places where it operates.

Solunion is committed **to promoting human rights in the communities in which it operates**. This commitment is materialized in:



Promote actions for the mitigation of climate change and the protection of the environment and ecosystems as a measure to contribute to the well-being of societies.



Relate in a transparent and ethical manner with regulatory bodies and Public Administrations, in accordance with Solunion's principles and policies.



To practice responsible taxation that contributes wealth to the communities in which the company operates and in accordance with the tax legislation applicable in each case.



Rejection of corruption as one of the most negative aspects for the institutions and democracy of societies.



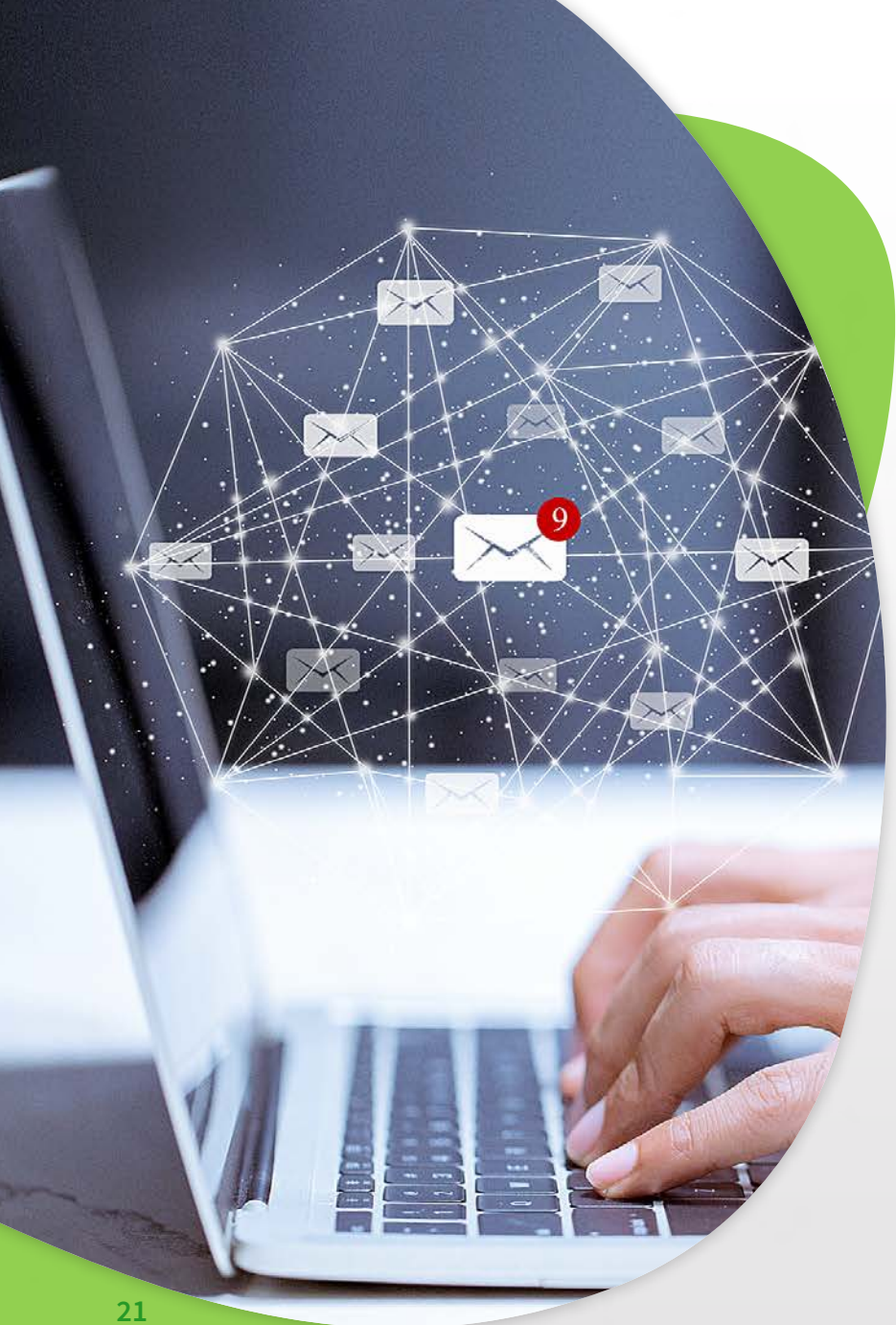
6. COMPETENT APPROVAL, IMPLEMENTATION, AND FOLLOW-UP BODIES

Solunion's Policy of Respect for Human Rights is approved by Solunion's Board of Directors, which shall observe compliance with it.

Solunion's Board of Directors will receive periodic information on the measures and procedures adopted in the Group to implement and monitor quantitatively and qualitatively the provisions of this Policy through the Sustainability Report or equivalent document.

Solunion will give this Policy the appropriate dissemination so that it is known internally and externally by the different Stakeholders.

The Social Responsibility and Sustainability Area is responsible for managing human rights due diligence, with the participation of the corporate areas involved, and is responsible for promoting, coordinating, measuring, supervising, and reporting, both globally and locally, the development and implementation of this Policy.



7.

COMPLAINT MECHANISMS

Solunion encourages all its Stakeholders and interested parties to contact the Group in case there is evidence that Solunion has not **fulfilled its responsibility to prevent any harm to human rights** or is involved in a human rights violation.

If you have any information regarding the above, please contact Solunion through our website: www.solunion.com.



8. REPAIR MECHANISMS

Solunion undertakes to remedy or contribute to the remedying of any adverse consequences that it is determined to have caused or contributed to.



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