

Human Rights Policy

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Version Control

Version	Date	Description
1	2017	First version of the Human Rights Policy
2	2026	Adaptation of the Policy to bring it into line with international standards and European regulations, incorporating due diligence and management approach

Purpose

The purpose of this Human Rights Policy established by and for Grupo Cooperativo Cajamar (hereinafter the Policy) is to formalise the organisation's commitment to upholding, protecting and promoting Human Rights, by setting out the principles, guidelines for action and the general framework that should guide the Group's conduct in the course of its activities and in its relations with its various stakeholders.

This Policy is designed as a tool to ensure the effective integration of Human Rights into business management and decision-making processes, thereby contributing to the creation of sustainable value and adherence to international standards and regulatory requirements in this area.

Furthermore, the Policy aims to:

- Establish a common framework for action that enables the prevention, mitigation and, where necessary, remediation of any adverse impacts on human rights arising from the Group's activities.
- Embed human rights principles into risk management, internal controls and operational processes.
- Promote a corporate culture based on respect for human dignity, equal treatment and non-discrimination.
- Promote awareness, training and accountability among all the Group's professionals in the field of human rights.
- Finally, this commitment extends to the Group's value chain, promoting responsible behaviour among suppliers.

Scope and application

Scope

This Policy applies to all activities carried out by Grupo Cooperativo Cajamar, regardless of the geographical area in which they operate, as well as to all the institutions that form part of the Group, including subsidiaries and other investee companies under its effective control.

Compliance with this Policy is mandatory for everyone within the organisation. This Policy applies to all employees, directors and members of the Group's governing bodies, who must be familiar with, respect and apply its principles in the performance of their duties and responsibilities, incorporating them into their decision-making and professional conduct.

Furthermore, the Group will promote the adoption of the principles set out in this Policy within its subsidiaries, as well as among its suppliers and third parties, encouraging behaviour that is consistent with respect for human rights throughout its entire value chain.

The Group will ensure that this Policy is properly disseminated and applied consistently and effectively across all its areas of activity, putting in place the necessary mechanisms to guarantee compliance.

Relevant regulatory framework

This Human Rights Policy is based on the main international standards, principles and frameworks in this field, as well as on applicable European and national legislation and the internal instruments established by Grupo Cooperativo Cajamar. It is a key element of the Group's system of governance, sustainability and internal control.

In particular, the Group refers to the following international frameworks:

- The United Nations International Bill of Human Rights, formed by the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights.
- The Declaration of the International Labour Organization on Fundamental Principles and Rights Associated with Work.
- The United Nations Guiding Principles on Business and Human Rights.
- OECD Guidelines for Multinational Enterprises.
- The United Nations Women's Empowerment Principles.
- The ten principles of the United Nations Global Compact, to which the Group subscribes.
- Furthermore, this Policy is in line with current European and national legislation on sustainability, corporate governance and human rights, incorporating requirements such as those arising from:
- Directive (EU) 2022/2464 on corporate sustainability reporting (CSRD) and its implementing measures.
- The European Sustainability Reporting Standards (ESRS), in particular those relating to social and human rights issues.
- Directive (EU) 2024/1760 on corporate sustainability due diligence (CSDDD), as well as its implementing measures and subsequent amendments as part of the simplification process.

Against this backdrop, and within an evolving regulatory environment, the Group adopts a proactive approach aimed at integrating the principles of human rights due diligence, incorporating criteria for identifying, preventing, mitigating and, where necessary, remedying impacts.

This Policy forms part of the organisation's set of corporate standards on environmental, social and governance matters, providing a framework for the integration of human rights within the organisation.

Human Rights principles and commitments

General principles governing action in the field of human rights

Grupo Cooperativo Cajamar bases its approach to human rights on a set of principles that underpin its commitment and guide the integration of these principles into its management and decision-making processes.

Upholding, protecting and promoting human rights

The Group is committed to upholding, protecting and promoting human rights in the course of its activities and in its relations with its various stakeholders.

In this regard:

- Upholding: the Group is committed to preventing human rights abuses in the course of its activities and within its sphere of influence.
- Protecting: the Group takes the necessary measures to prevent and mitigate negative impacts on human rights.
- Promoting: the Group promotes awareness, training and the development of initiatives that contribute to the defence and advancement of human rights.

Fundamental principles

The Group recognises human dignity as a guiding principle and bases its actions on the principles of freedom, equality and the holistic development of individuals, which underpin the Group's commitments:

- Principle of freedom: respect for fundamental rights and freedoms, including freedom of opinion, religion and association, as well as the rejection of any form of forced labour, exploitation or coercion.
- Principle of equality: promoting equal treatment and equal opportunities, rejecting all forms of discrimination and fostering inclusive and diverse

environments.

- Principle of holistic personal development: fostering decent working conditions, training, wellbeing, safety, and personal and professional development, contributing to a fulfilling life.

These principles form the ethical foundation underpinning the Group's commitments to human rights.

The Group's commitments on human rights

Grupo Cooperativo Cajamar undertakes the following commitments regarding human rights, which are implemented in accordance with the principles set out in this Policy and which guide its actions across its various areas of activity.

- Employment rights and working conditions: the Group is committed to ensuring decent working conditions that respect labour rights, and rejects any form of forced or child labour, as well as any practice that violates people's dignity. It also promotes fair working conditions, appropriate remuneration and compliance with the relevant labour regulations.
- Equality, diversity and non-discrimination: the Group is committed to promoting equal treatment and equal opportunities, and rejects any form of discrimination on the grounds of gender, age, origin, religion, sexual orientation or any other personal or social circumstance. It also promotes inclusive and diverse working environments, encouraging the integration of all people and the appreciation of diversity.
- Upholding fundamental freedoms: the Group is committed to strictly upholding people's fundamental rights, including freedom of expression, opinion and religion, as well as the right of association, the right to form trade unions and the right to collective bargaining.
- Health and safety: the Group is committed to providing safe and healthy working environments, taking the necessary measures to prevent workplace hazards and to ensure the physical and emotional wellbeing of its staff.
- Community relations and social development: "the Group is committed to extending its commitment to human rights throughout its entire value chain, encouraging responsible behaviour among its suppliers, employees and business partners, and promoting the adoption of standards aligned with this Policy throughout its value chain.
- Supply chain (value chain) and third parties: the Group is committed to extending its commitment to human rights throughout its entire value chain, encouraging responsible behaviour among its suppliers, contractors and business partners, and promoting the adoption of standards aligned with this Policy throughout its value chain.
- Sustainability and the environment: the Group recognises the interconnection between human rights, the social context and the environment, and promotes a model of sustainable development that contributes to the protection of the natural environment and people's wellbeing. This integrated approach guides

its business decisions, seeking to minimise any negative environmental impact of its operations and the activities it finances, in line with its vision of economic prosperity linked to social and environmental responsibility.

Implementation and monitoring of the Policy

Governance and responsibilities

Grupo Cooperativo Cajamar has established a human rights governance model that ensures human rights are properly integrated into its strategy, management and decision-making processes, and that ESG policies are upheld.

The Policy will be reviewed periodically, or whenever there are significant changes to the regulatory environment, the Group's activities, or the risks and impacts relating to human rights, thereby ensuring that it remains up to date and relevant. The Sustainability and Agri-Food Development Division carries out continuous monitoring to ensure that human rights are respected and upheld, and will be responsible for proposing to the Sustainable Development Operational Committee any necessary updates or amendments to this Policy. Once the proposals have been examined by that Committee, they will be submitted to the Board of Directors of Banco de Crédito Cooperativo for approval.

Integration of human rights risks

Grupo Cooperativo Cajamar embeds the identification and assessment of human rights risks and impacts into all its management and internal control processes, with the aim of identifying any potential adverse effects arising from its activities.

In this regard, the Group promotes mechanisms aimed at:

- Identifying and assessing potential and actual human rights impacts.
- Prioritising these impacts according to their severity and likelihood.
- Integrating their analysis into existing management processes and systems, in line with the Group's overall risk model.

This approach extends both to the Group's own activities and to its value chain, taking into account situations in which the Group may be exposed to or linked to human rights impacts through its business relationships.

Due diligence process

Grupo Cooperativo Cajamar adopts a human rights due diligence approach aimed at identifying, preventing, mitigating and, where necessary, remedying any adverse impacts arising from its activities, both in its own operations and throughout its value chain. Due diligence, as a comprehensive and ongoing process carried out by the Group to manage risks and impacts (both internal and within the value chain) in accordance with international standards, encompasses the entire cycle: risk identification (based on 4.2), implementation of measures, monitoring of results and, in the event of a breach, the implementation of corrective or remedial measures.

This approach is implemented through integrated processes that are embedded into the Group's management, which enable it to:

- Identify and assess potential and actual impacts on human rights.
- Put measures in place to prevent or mitigate such impacts.
- Promote, where appropriate, the adoption of corrective or remedial measures.
- Monitor the effectiveness of the measures taken.

Furthermore, the Group will take into account any situations in which it may be directly or indirectly linked to adverse human rights impacts through its business relationships or value chain, and will, where appropriate, take the necessary measures to prevent or mitigate such risks, in accordance with its internal policies and procedures.

The Group will document and evaluate the outcome of corrective measures as part of its continuous improvement process, reporting internally (and externally, where applicable) on progress in this area.

Communication channels, incidents and complaints

Grupo Cooperativo Cajamar has mechanisms in place to facilitate the reporting, management and resolution of any incidents, complaints or allegations relating to human rights, thereby ensuring a safe and accessible environment for everyone.

In this regard, the Group provides its employees and various stakeholders with appropriate channels for reporting potential breaches, including, among others, the Group's whistleblowing channel, ensuring that such reports are handled appropriately in accordance with established internal procedures.

The Group guarantees, in all circumstances, the confidentiality of information, the protection of those who report matters in good faith, and freedom from reprisals, thereby fostering an environment of trust and respect.

The Group analyses the information gathered through these channels to identify underlying causes and prevent future incidents.

Training, awareness and communication

Grupo Cooperativo Cajamar will promote training and awareness on human rights, with the aim of ensuring that these rights are properly understood and integrated into day-to-day activities and decision-making.

To this end, the Group will promote initiatives aimed at:

- Promoting awareness of the principles and commitments set out in this Policy.
- Promoting a culture that upholds human rights within the organisation.
- Facilitating training in the identification and management of risks and impacts on human rights.

These measures will be implemented gradually and tailored to the roles and responsibilities of the various groups, thereby promoting their effective integration into the Group's management. The Group is responsible for publicising the commitments set out in this Policy among its stakeholders and for reporting regularly on its implementation.