

# Human Rights Policy

Madrileña RED de GAS considers that respect for Human Rights is a fundamental part of its responsibility and, as such, one of the guiding principles of its activity. Madrileña Red de Gas is committed to respecting and promoting Human Rights, in all its operations, its value chain and in all the communities where it operates, with special attention to vulnerable groups, as established in its Code of Ethics. This commitment is reinforced by the general commitments contained in the Corporate Responsibility Policy and the rights recognized in:

- The United Nations Universal Declaration of Human Rights.
- The United Nations Global Compact.
- The United Nations International Covenant on Economic, Social and Cultural Rights.
- The United Nations International Covenant on Civil and Political Rights.
- The fundamental conventions of the International Labor Organization (ILO).
- The United Nations Convention on the Elimination of Discrimination against Women.
- The Guide to the UN Guiding Principles on Business and Human Rights.
- The United Nations Convention on the Rights of the Child.
- United Nations Convention on the Rights of Persons with Disabilities.
- The European Directive Due Diligence of Companies and Corporate Responsibility.
- The 2030 Agenda for Sustainable Development.

With the approval and publication of this Policy, Madrileña RED de GAS seeks to ensure respect for and protection of Human Rights in all of its activities, as well as to avoid situations of risk of human rights violations, by action or omission. and use its influence to promote compliance with and respect for human rights among its Stakeholders.

This policy is applicable to all employees, directors and the Board of Directors of Madrileña RED de GAS. With the aim of extending the principles of corporate responsibility throughout the supply chain, this commitment is extended to suppliers through the Sustainable Purchasing Policy and the Code of Conduct for suppliers, as well as the contractual specifications regarding working conditions and human rights.

## PRINCIPLES AND COMMITMENTS

With the development and implementation of this Policy, Madrileña Red de Gas establishes the following principles and commitments to respect Human Rights:

### 1. Respect for the Law

Madrileña RED de GAS assumes compliance with, and enforcement of, current legal regulations on human rights.

### 2. Work practices

Madrileña RED de GAS establishes scrupulous respect for the Human and Labor Rights of its employees, in accordance with the following principles:

- Rejection of any form of abuse, harassment or discrimination in the workplace, and establishing reporting channels for this purpose.

- Right to non-discrimination and diversity at work, guaranteeing equal opportunities, regardless of race, sex, maternity/paternity, beliefs, ideology, sexual orientation, nationality, social origin, health, age, disability or other personal characteristics.
- Right to accessible environments, promoting working environments and jobs considering universal accessibility criteria.
- Right to fair and equitable remuneration: providing a favorable remuneration system, linked to professional category, performance and achievement of company objectives.
- Right to rest and free time, promoting work-life balance and well-being initiatives among its employees and their families, including the right to digital disconnection.
- Right of our employees to freedom of association and to be represented to defend their interests, ensuring controls and non-discriminatory policies against workers' representatives, respecting the exercise of their activity during the working day.
- Right and respect for collective bargaining, this being the vehicle to regulate relations between the company and employees.
- Right to conditions that respect the health, safety, well-being and dignity of the worker, safety being one of the fundamental pillars.
- Right to privacy of information and intimacy of the worker, through the application of policies, processes and security systems for information security and protection of personal data.

### **3. Purchases and suppliers**

Madrileña RED de GAS has established a Sustainable Purchasing Policy, through which it collaborates with its suppliers and subcontractors to guarantee respect for Human Rights throughout the Supply Chain.

This commitment is materialized through the Code of Conduct for suppliers, which develops the Sustainable Purchasing Policy and is managed by the procedures for monitoring the activity of suppliers and contractors.

Madrileña RED de GAS extends to its suppliers and collaborators the labor principles and practices applicable to its workers, as well as expresses its rejection of any form of forced or compulsory labor and child labour.

### **4. Customer relations**

Madrileña RED de GAS establishes a framework of respect for the rights of its customers, in accordance with the following principles:

- Equal and respectful treatment of its clients, regardless of their profile and without prejudice due to their gender, nationality, ethnicity, age, family responsibilities or any of their characteristics.
- Respect for the rights of the client and the consumer derived from contractual commitments and current legal regulations.
- Recognition of the right to information privacy and data reliability of all its stakeholders, implementing and ensuring an information security management system and personal data protection, and maintaining strict compliance with the different regulations and European and national laws.

### **5. Commitment to society, communities and environment**

Madrileña RED de GAS is committed to generating a positive and sustainable impact in the social spheres and communities in which it operates, in accordance with the following principles:

- Act with honesty and integrity, both in business processes and in relationships with suppliers and customers.
- Pursue and combat corruption in all its forms, through the implementation of procedures and mechanisms for monitoring and controlling the activity.

- Manage the natural capital, and control and minimize the environmental risks and impacts derived from the activities.
- Establishment of collaboration mechanisms with social agents, associations and public entities, to work together in the mitigation of existing risks for Human Rights.
- Respect for the social, cultural and economic rights of the communities in which the activity takes place, establishing relationships of collaboration and trust.
- Establishment of measures to mitigate the possible impacts on the commitments made and human rights, with special attention to access to energy by vulnerable individuals and groups.
- Creation of channels and mechanisms for listening and dialogue with the Stakeholders, to identify, understand and respond to their expectations.

## **DUE DILIGENCE**

Madrileña RED de GAS has developed a Human Rights Due Diligence Model based on carrying out and maintaining a risk analysis to identify potential impacts on compliance with the principles of respect for Human Rights defined in this Policy.

This Model is based on the principles of protection, respect and remediation, aimed at fulfilling the commitments established in this policy and the behaviors established in its Code of Ethics, minimizing the risks and impacts on the principles of this policy:

- The Board of Directors is responsible for approving and supervising the general Human Rights strategy of the Company, and from which this Policy derives.
- The Risk Manager is responsible for the management of the Due Diligence procedures and for carrying out the risk assessment in terms of Human Rights, reporting to the Audit and Risk Committee.
- The Audit and Risk Committee is periodically informed about the implementation and performance of this Policy and the Code of Ethics by the Organization as a whole, with the aim of monitoring and evaluating the degree of implementation and effectiveness of the Policy for manage the protection of human rights.
- Madrileña RED de GAS has implemented communication and complaint channels to ensure the treatment and remediation of possible irregularities, including human rights violations or abuses. Any employee, supplier, customer or interested party can raise their issues, questions or complaints. All communications received through this channel are handled in accordance with the principles of Confidentiality, duty of secrecy and security.

## **REVIEW AND COMMUNICATION**

This Policy is reviewed annually, considering organizational, legal, operational changes or any other that may affect its development, with the aim of maintaining its relevance, efficiency and effectiveness.

In Pozuelo de Alarcón, December 26<sup>th</sup>, 2021



Alejandro Lafarga Ibran  
Chief Executive Officer