MG_ES_AN-04

WORKING CONDITIONS AND HUMAN RIGHTS POLICY

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1. Purpose

The purpose of this Human Rights Respect Policy is to formalise METAL GROUP's commitment to the human rights recognised in national and international law and to define the general and basic principles to be applied by METAL GROUP for human rights due diligence in accordance with the Guiding Principles on Business and Human Rights, the principles on which the United Nations Global Compact is based, the conventions of the International Labour Organisation (including Convention 169), the Sustainable Development Goals (SDGs) adopted by the United Nations, as well as any documents and/or texts that may replace or complement the aforementioned.

2. Scope of Application

This Policy is of obligatory compliance and of global and direct application for all the companies that make up the METAL GROUP - regardless of their geographical location - and is binding on all their personnel, regardless of the position and function they hold.

Compliance with this Policy is also obligatory for individuals and/or legal entities related to the METAL GROUP, insofar as applicable, who, where applicable, must undertake in writing to comply with it.

In accordance with the Policy, the METAL GROUP may develop procedures and instructions to implement and comply with the obligations assumed, as well as to adapt it to the various local legislations applicable to the Group.

3. Content of the Policy

3.1. General principles

METAL GROUP respects human rights. It is committed to identifying, preventing and mitigating adverse human rights impacts arising from or caused by our business activities before or if they occur as a consequence of human rights due diligence and mitigation processes.

3.2. Concept of Working Conditions and Human Rights

For the purposes of this policy, Working Conditions and Human Rights means respect for the dignity of individuals and their inherent rights.

3.3. Basic principles of action

Valuing diversity

METAL GROUP values the diversity of the people we work with and their collaboration. We are committed to equal opportunities and intolerance of discrimination and harassment. We are dedicated to maintaining workplaces where there is no discrimination or harassment on the basis of race, gender, colour, nationality or social origin, religion, age, disability, sexual orientation, political opinion, or any other category protected by applicable laws. The basis for recruitment, hiring, placement, training, compensation and promotion at METAL GROUP is based on aptitude, performance, skills and experience.

Regardless of personal characteristics or status, METAL GROUP does not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment is unacceptable in the

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workplace and in any work-related circumstances outside the workplace. These principles apply not only to METAL GROUP employees, but also to the business partners with whom we work.

Freedom of association and collective bargaining

The METAL GROUP respects the right of its employees to form, join or not join a trade union without fear of retaliation, intimidation or harassment. Where employees are represented by a legally recognised trade union, we are committed to constructive dialogue with their freely elected representatives. METAL GROUP is committed to negotiate in good faith with such representatives.

Safe and healthy workplace.

METAL GROUP provides a safe and healthy workplace and complies with applicable laws, regulations and internal health and safety requirements. We are dedicated to maintaining a productive workplace by minimizing the risk of accidents, injuries and exposure to health hazards. We are committed to engaging with our employees to continuously improve health and safety in our workplaces, including identifying hazards and working to resolve health and safety issues.

Workplace safety

METAL GROUP is committed to maintaining a workplace free from violence, harassment, intimidation and other conditions that are unsafe or disruptive due to internal and external threats. Security safeguards are available to employees as needed and will be maintained with respect for the privacy and dignity of employees as a premise.

Forced labor and human trafficking

METAL GROUP prohibits the use of all forms of forced labor, including prison labor, indentured or bonded labor, military, slave and any other form of human trafficking.

Child labor

The METAL GROUP prohibits the direct and indirect employment of persons under the age of 18 in positions involving hazardous work.

Working hours, wages and benefits

The compensation of METAL GROUP employees is competitive in relation to the industry and the local labor market. We operate in full compliance with applicable laws regarding wages, working hours, overtime and benefits.

3.4. Operation

It shall be the responsibility of HR, with the cooperation of the affected area, to identify potential human rights conflicts in its processes and to plan measures to prevent them.

It must be possible to provide evidence of prevention mechanisms and, in the event of conflicts, also evidence of conflict management in the METAL GROUP's risk management process. If there is a conflict between the text of the policy and the laws, customs and practices of the place where you work, if any questions arise about this policy or if you wish to report a possible violation of this policy, you should raise those questions and concerns through the existing processes, which make every effort to maintain confidentiality. Questions or reports of possible violations should be dealt with by management and/or Human Resources.



No retaliatory action will be taken against an employee for raising concerns under this policy.

METAL GROUP is committed to investigating, resolving and responding to employee concerns and taking appropriate corrective action in response to any violations.

4. Communication of the Policy

This Policy will be available on the Web and App to all employees and will be made available to all stakeholders of the Company. The Policy will also be subject to appropriate communication, training and awareness-raising to ensure its timely understanding and implementation.

5. Implementation of the Policy

METAL GROUP undertakes to allocate specific resources to ensure the effective implementation of the Policy.

6. Updating and reviewing the Policy

The Policy will be reviewed and updated when appropriate, in order to adapt it to changes that may arise in the business model or in the context in which the Group operates, guaranteeing at all times its effective implementation.

Antonio Román Molina C.E.O In Abadiano, 30th of March 2022

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