

HUMAN RIGHTS POLICY

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Policy approved by the Board of Director of Lorca Telecom, S.A. at its meeting of September 29th, 2022.

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The Board of Directors of LORCA TELECOM BIDCO, S.A. (the "Company") has the authority to design, evaluate and permanently review the Company's Corporate Governance System and to approve the Corporate Policies thereby developing the principles reflected in such set of regulations, and that contain the guidelines governing the actions of the Company and the companies within its group.

Respect for human rights is a fundamental part of this culture. This policy develops and supplements the Corporate Social Responsibility Policy.

1. PURPOSE

The purpose of this Policy on Respect for Human Rights is to formalise the commitment of the MASMOVIL Group to the human and labour rights enshrined in national and international legislation and to the principles on which the United Nations Global Compact, the Guiding Principles on Business and Human Rights: Implementing the United Nations to "Protect, Respect and Remedy" Framework and the Social Policy of the International Labour Organisation are based, as well as any documents or texts that may replace or supplement the aforementioned.

2. BASIC PRINCIPLES OF ACTION

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

- a. To require all the Group's professionals and suppliers to strictly respect the human and labour rights recognised in national and international legislation in the performance of their activities, as well as to comply with international standards in those countries where human rights legislation has not been adequately developed.
- b. To reject child labour and forced or compulsory labour and respect freedom of association and collective bargaining rights, the right to freedom of movement within each country, as well as the right to non-discrimination.
- c. To seek to implement due diligence procedures to identify situations and activities of higher risk of human rights violations - in particular in the areas outlined in the

previous principle - and develop mechanisms to prevent and mitigate such risk in their activities and those of their suppliers.

- d. To require their suppliers to comply with the Supplier Code of Ethics, which obliges them to take the necessary actions and measures within their organisation to remove all forms of forced or compulsory labour, to expressly reject the use of child labour in their organisation, to respect the freedom of association and the right to collective bargaining of their employees, to reject any discriminatory practices in employment and occupation, to treat their employees fairly, with dignity and respect, and to pay their employees in accordance with applicable wage laws, including minimum wages, overtime and social benefits.
- e. To periodically verify the application of procedures to identify risk situations and activities and of mechanisms to prevent and mitigate the risk of human rights violations, with monitoring indicators, focusing its analysis especially on the main centres of activity where there may be a risk of human rights violations, taking as a reference the reports and recommendations issued by international organisations of recognised prestige.
- f. To communicate the result of this verification activity in its annual public information, available on its corporate website.
- g. To adopt the appropriate measures in the event of detecting a breach of human rights in the Company or in the companies of its Group or in those of its suppliers, under the terms set forth in the Code of Ethics or in the Supplier Code of Ethics.
- h. To have in place whistle-blowing and complaint mechanisms, with sufficient guarantees and appropriate resolution procedures, to deal with possible cases of human rights violations that may be reported by persons or organisations outside the Group.
- i. To promote a culture of respect for human rights and raise awareness of human rights among its professionals in all Group companies.

3. IMPLEMENTATION AND UPDATING

The Company shall foster a culture of respect for human rights as part of its social responsibility actions, promoting awareness of and strict compliance with the principles of respect for human rights set out in this Policy.

4. VERSION HISTORY

Current version	2.0	
Change History	Date	Version
	30/06/2017	1.0
	29/09/2022	2.0