

Policy on Human Rights and Community Relations

1. Policy purpose

This Policy establishes the principles and guidelines that guide our company's relationships with local communities and our commitment to human rights. It promotes responsible and sustainable business practices that foster social, economic, and environmental development in the areas influenced by our concessionaires.

This Policy is implemented through the CSR actions developed by the concessionary companies, with a focus on respecting human rights and actively engaging communities based on transparency and ongoing dialogue. Through this policy, Globalvia aims to build a long-term relationship with local communities oriented toward inclusive, sustainable development that respects human rights in all aspects.

2. Scope

This document applies to all companies within the Globalvia Group.

3. Content of the Policy

3.1 Our aim

As outlined in various Globalvia policies, our purpose is to respect the communities where all our activities take place. We are committed to protecting internationally recognized rights as outlined in treaties and international standards on business and human rights. We support and abide by the principles set forth in the UN Guiding Principles on Business and Human Rights (UNGPs) and the Universal Declaration of Human Rights (UDHR). This includes a commitment to identify, prevent, and mitigate any negative impact that our operations may have on human rights and the well-being of local communities. We are committed to acting with diligence, transparency, and respect for people and environments where we operate, promoting practices that

contribute to sustainable development and the improvement of quality of life in our areas of influence.¹

3.2 Our commitments in this area

1. Proceed with due diligence on human rights

Ensure respect for human rights in all our activities across every country where we operate and at every stage of a concession or project lifecycle, from planning and development to operation and closure.

This commitment involves:

- Promoting a culture of respect for human rights by raising awareness and providing training to our teams, suppliers, and stakeholders.
- This includes focusing on key human rights issues that are particularly relevant to our business, such as labor rights, fair wages, and safe working conditions for all workers across the supply chain. We are also committed to protecting the rights of vulnerable groups, including children, through measures to prevent child labor and exploitation. Furthermore, we prioritize the respect for the rights of indigenous peoples, land rights, and access to resources, ensuring that our projects and operations do not infringe upon these rights. By addressing these critical areas, we aim to mitigate risks and promote sustainable and ethical practices within our operations and partnerships.
- Defining and implementing actions to prevent and mitigate the negative impacts that our activities may entail.
- Establishing effective communication mechanisms with our communities so that they can inform Globalvia of any situation that may have an impact on human rights.
- Acting with complete transparency with public institutions, partners, and stakeholders.
- Collaborating with national or international human rights protection systems, whether judicial or extrajudicial, and not obstructing their normal functioning.

2. Maintain strong relationships with our stakeholders

- Ensure the respect of human rights for all individuals working within the Globalvia Group companies, with particular attention to health and safety, freedom of association, the right to collective bargaining, and compliance

¹ International standards on business and human rights: United Nations Guiding Principles on Business and Human Rights, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the Performance Standards on Environmental and Social Sustainability, and the principles of the Global Compact.

with the various standards set by Globalvia, always in strict adherence to the applicable legislation in the countries where we operate.

- Promote a work environment free from discrimination and harassment in all its forms, including violence and harassment in any form or type, and take active measures to prevent these behaviors.
- Reject any form of child labor, forced labor, and the exploitation of individuals through human trafficking.
- Build strong, trust-based relationships with the communities and stakeholders in the areas where our concessionaires and projects operate, grounded in values of mutual respect, trust, recognition, cultural sensitivity, integrity, responsibility, transparency, good faith, and non-discrimination. To achieve this, continuous and constructive dialogue, as well as transparent and responsible management of impacts and opportunities, will be promoted.
- Implement projects that generate social and environmental benefits for the communities. Promote education, local employment, and skill development by providing training and resources to enhance the abilities of local individuals and communities, empowering them to participate in and benefit from our projects sustainably

To this end, at Globalvia we are committed to:

- Analyze and deeply understand the socio-economic context of the communities in which we operate, identifying actions that can be carried out in partnership with local communities to contribute to the development of the most disadvantaged people in each society.
- Value, recognize, and respect the uniqueness and identity of the communities, as well as their cultural diversity, aspirations, and needs, recognizing their right to preserve their traditions and social practices.
- Foster transparent, timely, and honest dialogue, culturally adapted and based on active listening, the open exchange of information, and the creation of shared value.
- Recognize and respect the uniqueness of indigenous, tribal, aboriginal, and native peoples, as well as their rights, in accordance with the legislation in each country and human rights.
- Ensure human rights for our users, as well as in our relationships with communities, rejecting any form of discrimination.
- Identify opportunities to maximize the positive impacts of our activities, contributing to local socio-economic development and environmental protection in our areas of influence, in line with our commitments to the Sustainable Development Goals.

3. Work with our various suppliers to extend these commitments

Globalvia is committed to ensuring that its partners and suppliers respect these commitments and human rights in developing their activities, and respond appropriately to any negative impacts they may be involved in.

To achieve this, Globalvia is committed to:

- Promoting awareness and compliance with the commitments outlined in this policy.
- Collaborating with our partners and suppliers to facilitate the implementation of human rights due diligence.

4. Evaluation, improvement and reporting channel

At Globalvia, we are committed to monitoring and evaluating the effectiveness of this policy by actively seeking feedback from the communities and making adjustments to our practices as needed. To this end, we will utilize the annual Sustainability Report to assess progress and inform improvements.

In addition, we have implemented several key measures to support the success of this policy, including:

- Grievance mechanisms, providing a transparent channel for communities to voice concerns and seek resolution.
- Training and skill development, reinforcing our commitment to educate both employees and suppliers, as detailed under section 3.2 (1),
- Monitoring and reporting, ensuring public accountability through our regular progress reports on both achievements and challenges.
- Remediation processes, outlining clear procedures for addressing any adverse impacts and taking corrective actions where necessary.
- Review and continuous improvement, committing to regular reviews and updates of this policy to ensure it remains relevant and effective.

Additionally, at Globalvia we provide an Ethics Channel, <https://www.globalvia.com/en/we-are-globalvia/how-we-are/ethical-channel/>, where any interested person can report potential breaches of this policy, ensuring a confidential and secure process to address concerns or complaints that may arise.

At Globalvia, the success of this policy will be measured through qualitative and quantitative indicators, reflecting our commitment to fostering positive and sustainable relationships with local communities. Specifically, we will consider this policy successful if we continue achieving the following outcomes:

- Trust and collaboration with local administrations: Demonstrated through positive feedback from key community stakeholders, increased

participation in joint initiatives, and reduced grievances over time (where applicable).

- Measurable impact: Evidenced by the delivery of tangible benefits to communities, such as increased local employment opportunities, skills development, or improved community infrastructure.
- Transparency and accountability: Achieved through consistent and comprehensive reporting on the outcomes and challenges related to our community engagement efforts in the Annual Sustainability Report.

5. Validity

This Policy will come into effect on the day of its approval and must be communicated to all companies within the Globalvia Group. It will remain in force until it is annulled or replaced by another Policy. Additionally, this Policy will be reviewed on an annual basis, and the findings of each review will be reported to the Board to ensure ongoing alignment with the company's objectives and community needs.

Approved in Madrid, on November 27, 2024.