

Through this policy, the Group expressly manifests its commitment to respect and protect the human rights of the persons, which form part of the Company, of its chain of supply and of the communities affected by the Group's activities.

Said commitment is publicly materialized by its adhesion to the principal initiatives and directives on this matter, which are:

- The Universal Declaration of Human Rights
- United Nations Worldwide Pact (Member and founding partner of its Spanish network)
- Tripartite Declaration of the International Labor Organization (ILO) with relation to the fundamental principles and rights in labor
- OCDE Directive Lines for Multinational Companies
- United Nations Guiding Principles on Companies and Human Rights

Commitment

The OHLA Group Human Rights Policy is based on the results of a series of previously undertaken efforts, which has enabled us to identify and prioritize the principles to which the Group committed:

- Analysis of country risk in places where we operate based on the public indicators of leading organizations and institutions in reference to human rights.
- Internal corroboration with the leaders of the different business areas of the Group to know their perception of the non-compliance risk.
- External consultation with local and international prescribers.

The Group will also promote the performance of due diligence to identify, prevent violations of human rights as per the Guiding Principles on Companies and Human Rights and, if the case, mitigate any impact that may originate.

The implementation of the Human Rights Policy of the OHLA Group is determined by the existing institutional and legal framework in each country, although the company is committed to applying this policy to the management systems on a global basis. The Audit and Compliance Committee is the highest body responsible for ensuring compliance with human rights in the OHLA Group and assumes the functions of monitoring and control through the Internal Audit Department.

The OHLA Group, through its Ethics Channel, facilitates the communication of any situation, which may pose a risk of violating the principles and non-compliance with this Policy.

The Principles of the Human Rights Policy of OHLA

Abolition of forced labor: The OHLA Group pledges to generate freely chosen employment and not use forced or compulsory labor in any form.

- **Equality at work and combating discrimination:** The OHLA Group guarantees equal opportunities and is committed to providing the means and resources necessary to help all employees to enjoy professional and personal development on equal terms prohibiting any type of discrimination (gender, race, sexual orientation, disability or any other circumstance likely to be a source of discrimination).
- **Provide decent work:** The OHLA Group offers all its employees and contractors decent employment, adjusted to their skills, responsibilities and functions, in accordance with the ILO guidelines.

The OHLA Group applies the same labor standards and rights to migrant workers and their families. The Group also understands the importance that the recruitment processes are fair and transparent, and promises that migrant workers shall always know their rights at the time of recruitment, both verbally as well as in writing.

- **Ensure personal health and safety:** The OHLA Group respects and protects the safety and dignity of the persons and their civil, political and financial rights in the countries where the company operates. To this end, the Group is committed to enabling the necessary means and implement and communicate the best practices in health and prevention of occupational risks.
- **Respect for minorities and indigenous communities:** The OHLA Group respects and protects the rights of minorities, indigenous communities and all marginalized communities in all areas where it operates and is committed to work and talk with the communities to minimize the negative effects of their activities on the communities and their way of life within the framework of existing legislation, agreements and treaties.
- **Promote freedom of association and collective bargaining:** The Group promotes and respects the right of association and collective bargaining in the workplace and is committed not to interfere with their workers who want to freely and voluntarily join legal unions and nor adopt any discriminatory measures on these grounds.
- **Abolition of child labor:** The recruitment of minors is expressly regulated by the Group's policy in accordance with the ILO agreements regulating the legal minimum age to work.
- **Protect the environment of the person:** The OHLA Group is committed to respecting and protecting the right of employees and third parties to enjoy a healthy environment.
- **Physical safety, security companies and Human Rights:** The Company is committed to providing working facilities, and facilities for overnight stays, when appropriate, under conditions of safety, welfare and proper hygiene that meet the requirements for security, space, temperature, lighting, ventilation, drinking water and sewage. OHLA is also committed to comply with the Voluntary Principles on Security and Human Rights in the exercise of surveillance and physical security.

Approved by the Steering Committee at its meeting held on February 20, 2017.