

HUMAN RIGHTS POLICY

QGMI Compliance Policy No. 14	
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SUMMARY

1. Introduction and Objective.....	2
2. Principles.....	2
3. Scope.....	2
4. Our Commitments.....	3
5. Follow-up.....	5
6. Exceptions	5

1. Introduction and Objective

- 1.1. At the QGMI Group ('QGMI'), we believe in human rights and the dignity of all people. We are committed to ethical behaviour in all our activities, in accordance with the UN Guiding Principles on Business and Human Right.
- 1.2. At QGMI, we are aware that our business has an impact on society. Therefore, we seek to ensure that all stakeholders (including our employees, suppliers, customers, business partners and even the communities in which we operate) are treated with the utmost respect and fairness at all times.
- 1.3. The purpose of this Human Rights Policy is to draw up and specify QGMI's commitment to support and respect the human rights of every individual and community, based on our Code of Ethics.

2. Principles

- 2.1. QGMI adheres to internationally recognised human rights standards, such as the International Bill of Human Rights or the ILO Declaration on Fundamental Principles and Rights at Work and, in particular, is guided by the UN Guiding Principles on Business and Human Rights.
- 2.2. This Policy is supplementary to the Code of Ethics and other Policies applicable to QGMI.

3. Scope

- 3.1. This Policy, as well as all the principles and commitments established herein, must be observed by all our Employees, and by all those who act on behalf of QGMI, directly or indirectly, whether they are suppliers, subcontractors, representatives, consultants, agents or third parties.

4. Our Commitments

Our activities may have an impact on human rights; such as the forced/involuntary labour, migrant workers, third-party recruiter, employment agents, contract of employment, health and safety, legal provisions of wages and benefits, working hours and overtime, non-discrimination, prohibition of harassment and inhumane treatment, grievance procedures, respect for freedom association and recruitment and termination, and therefore, in addition to having the following commitments, we have a management system developed for each project that allows us to minimize the impact identified in each opportunity.

4.1. Our Human Rights Policy is a reflection of our belief in the importance of protecting human rights, and the dignity of individuals. As a result, our commitments are the principles that drive all our actions. These commitments consist in:

- Supporting the Universal Declaration of Human Rights;
- Encouraging respect for these rights among our contractors, suppliers and business partners;
- Rejecting the use of any form of forced or compulsory labour and any form of slavery and human trafficking as defined by the ILO Convention No. 29.
- Investing in employees and caring for them by providing them with opportunities for development and growth;
- Creating an inclusive workplace and condemning discrimination of any kind, including discrimination based on age, gender, religion, ethnicity, sexual orientation or disability;
- Ensuring that our employees are aware of their rights and obligations as part of QGMI;
- Actively discouraging any form of bullying, harassment or sexual harassment, and addressing them through appropriate disciplinary measures;
- Respecting the free movement of our employees;
- Rejecting and reporting any form of forced labour and/or child labour;
- Rejecting and reporting any form of modern slavery, including but not limited to confiscation of documents and compulsory overtime;
- Fulfilling our commitment to be a responsible corporate citizen, respecting human rights and supporting their protection and promotion;

- Respecting the right to rest and leisure, ensuring regular paid holidays;
- Caring for the health, safety and physical and relational well-being of our employees;
- Complying with the international laws and regulations in force in the countries in which we operate and complementing this Policy at local level where necessary;
- Requiring our supply chain to observe and fulfil these commitments.

5. Follow-up

- 5.1. The company, and in particular the Human Resources Manager, is in charge of keeping this Policy up to date and reviewing it whenever there is a significant change in business and/or regulation. Moreover, it regularly monitors business units' compliance with our commitments.
- 5.2. Whenever is necessary and the Equator Principles are applicable, the projects will conduct a Human Risk Assessment Study to identify the risks and afterwards will consider those risks and mitigation measures in the corresponding plans of the management system, identifying the persons in charge of the implementation. This affect to all the company departments. The coordination of this task will be facilitated by the sustainability team and the Human Resources Manager.

6. Exceptions

There are no exceptions to this Policy.

This Policy was approved on 28 February by Gustavo D. Guerra.