



Human Rights Commitment Policy



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I. PURPOSE AND COMMITMENT

The management body of PRAXIA ENERGY S.L., in line with the values of **integrity, respect for people, and responsibility** defined in its Code of Ethics, expresses its firm commitment to respecting and promoting human rights in all its activities, operations, and business relationships.

This policy establishes the principles and guidelines that should guide the behavior of the Company and all its members to prevent, mitigate, and, where appropriate, remedy any adverse impact on human rights that may arise from its business activities.

PRAXIA ENERGY recognizes that respect for human rights is a fundamental pillar for the development of a sustainable, ethical, and responsible business, observing the internationally established guidelines in:

- The United Nations International Bill of Human Rights.
- The ILO Declaration on Fundamental Principles and Rights at Work.
- The United Nations Guiding Principles on Business and Human Rights.
- The OECD Guidelines for Multinational Enterprises.

This policy complements and integrates with the rest of PRAXIA ENERGY's internal regulations, including our Code of Ethics, Anti-Corruption Policy, and Harassment Prevention Protocol.



II. SCOPE OF APPLICATION

This policy is mandatory for all PRAXIA ENERGY members, including members of the governing body, managers, and employees, regardless of their hierarchical level, contract type, or geographical location.

Furthermore, PRAXIA ENERGY extends its commitment to human rights throughout its entire value chain. Consequently, the Company expects and requires that its suppliers, contractors, subcontractors, agents, business partners, and any third party with whom it has a commercial or collaborative relationship respect and apply principles equivalent to those set forth in this Policy.

In line with the above, PRAXIA ENERGY will integrate human rights performance assessment as a key criterion in the selection and hiring processes for suppliers and business partners.

It will also promote the inclusion of contractual clauses that reflect the commitments of this Policy, establishing that serious non-compliance may be grounds for review, suspension, or termination of the business relationship.

Similarly, it will encourage its business partners to adhere to standards of conduct aligned with the principles set forth herein, which may be articulated through a specific Code of Conduct for the supply chain.



III. GUIDING PRINCIPLES

PRAXIA ENERGY is committed to respecting internationally recognized human rights and bases its actions on the following principles:

1. Labor Rights and Decent Working Conditions:

- **Non-discrimination and Equal Opportunities:** Any type of discrimination in employment based on sex, age, origin, ideology, sexual orientation or identity, or any other condition is prohibited, in compliance with Article 17 of the Workers' Statute and the Organic Law for Effective Equality between Women and Men. Equality plans and measures that ensure equal treatment and opportunities will be actively promoted, fostering an inclusive work environment.
- **Prohibition of Forced Labor, Human Trafficking, and Child Labor:** PRAXIA ENERGY declares its zero-tolerance policy toward any form of forced labor, human trafficking, and child labor, both in its own operations and in its value chain, suppliers, and business partners.
- **Access to Employment and Personnel Selection:** PRAXIA ENERGY is committed to ensuring that all selection and hiring processes are conducted fairly, objectively, and equitably, based exclusively on the principles of merit, ability, and suitability of candidates for the position. Any type of discrimination in access to employment is expressly prohibited, ensuring strict compliance with the current regulations on the minimum age for access to employment, reinforcing the commitment to prohibit child labor.

- **Freedom of Association and Collective Bargaining:** The right of workers to freely associate and engage in collective bargaining shall be respected, in accordance with current legislation.
- **Fair Pay and Working Hours:** Fair remuneration and strict compliance with regulations on working hours, breaks, and digital disconnection will be guaranteed, promoting a healthy work-life balance.

2. Occupational Health and Safety

PRAXIA ENERGY is committed to providing a safe and healthy working environment, as set out in the Code of Ethics. This includes the prevention of not only physical risks, but also psychosocial risks, by taking the necessary measures to protect the overall well-being of its employees.

3. Prohibition of Harassment and Violence

The Company maintains a zero-tolerance policy toward any form of harassment (sexual, gender-based, workplace) or violence in the workplace. Established internal procedures will be applied to prevent, detect, investigate, and punish such conduct, ensuring the protection of victims.

4. Diversity and Inclusion

An inclusive work environment will be fostered that values diversity as an asset to the Company, promoting a culture of mutual respect where all people feel integrated and valued.

5. Privacy

The right to privacy of employees, customers, and other third parties will be respected, treating their personal information confidentially and securely, in accordance with applicable data protection legislation.

6. Relationship with the Supply Chain

PRAXIA ENERGY will apply due diligence processes to identify and assess human rights risks in its supply chain. Suppliers and business partners will be expected to comply with standards equivalent to those set out in this policy, and failure to do so may be grounds for termination of the contract, as provided for in the Anti-Corruption Policy.

7. Impact on the Community and Environment

PRAXIA ENERGY recognizes that environmental protection and sustainable development are fundamental to the full enjoyment of human rights. Therefore, the Company is committed to operating responsibly, applying due diligence to identify, prevent, mitigate, and, where appropriate, remedy any adverse impacts that its activities may have on the natural environment and local communities.

This commitment includes respect for the right to a healthy environment, access to natural resources, and the promotion of open and constructive dialogue with the communities in which we operate.

These principles, aligned with our Code of Ethics, are further developed and specified in the Company's Environmental Policy, which sets out the specific objectives and mechanisms for ensuring compliance.

IV. IMPLEMENTATION MECHANISMS AND DUE DILIGENCE.

To ensure the effectiveness of this policy, PRAXIA ENERGY undertakes to:

- **Integration:** Integrate human rights principles into all relevant business policies, procedures, and decisions.
- **Risk Assessment:** Conduct periodic assessments to identify and analyze potential adverse human rights impacts arising from its operations and value chain.
- **Training and Awareness:** Provide ongoing training to its members to ensure understanding and correct application of this policy.
- **Contractual guarantees:** Include these guarantees in contracts signed with suppliers and commercial or business partners to ensure compliance with this policy.

V. COMMUNICATION AND REPORTING CHANNELS.

Any member of PRAXIA ENERGY or third party who becomes aware of a possible breach of this Policy must report it through the company's **Ethics Channel**.

PRAXIA ENERGY guarantees that all communications will be treated with the utmost **confidentiality**, investigated **impartially**, and that no reprisals will be taken against those who communicate in good faith. The management of these communications will be supervised by the **Compliance Body**.

VI. APPROVAL, SUPERVISION AND REVIEW.

This policy is approved by the company's management body.

The **Compliance Officer** will be responsible for supervising the implementation and effective compliance with this policy.

The Compliance Officer shall be responsible for promoting the necessary measures for the dissemination, understanding and application of this policy at all levels of the Company, as well as for reporting periodically to the governing body on its degree of compliance, effectiveness and any areas for improvement identified.

This policy will be reviewed periodically by the governing body to ensure its continued suitability and effectiveness.

This policy will come into effect on the day of its approval.