

Navantia's Commitment to Human Rights and Due Diligence



Navantia



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Navantia, SA, SME (hereinafter Navantia or the Company, as appropriate) is a Spanish state-owned company, who is an international leader in the design, construction, and lifecycle support of high-technology naval programs. It is also a recognized leader in other industrial and innovation capabilities, particularly in the development of products and services in the green energy sector. Its leadership in the defense and security sector and its strong position in the international market, with a presence in more than 20 countries, are supported by a diverse and committed labor force. Furthermore, it complements its capacity with close collaboration with stable technological and industrial partners, both national and international. It maintains a long-standing commitment to its customers, suppliers, and other individuals or entities with which it interacts, based on transparency, integrity, and good governance.

In this regard, Navantia's commitment to ethical and socially responsible business conduct is supported by the Code of Business Conduct and Code of Conduct for Business Partners, as well as our Sustainability Policy and other corporate policies that directly or indirectly protect the fundamental rights of individuals. All of this is in accordance with national and international legislation and the best practices referenced in Annex II.

In line with the Code of Business Conduct, this document publicly demonstrates Navantia's responsibility to comply with the highest standards of respect for and protection of Human Rights and Due Diligence. We base our commitment on the main international treaties and instruments, as well as European and national legislation, both in Spain and in each of the countries where Navantia operates. The Company is aware that this aspect is a fundamental element on which both its purpose and its values are based, also contributing to sustainable development and compliance with the United Nations 2030 Agenda.



01 | PURPOSE AND SCOPE OF APPLICATION

1.1. OBJECT



The primary objective of this document is to articulate Navantia's dedication to Human Rights. It outlines the foundational principles that underpin this commitment, aiming to enhance the Company's role in upholding and advocating for these rights as delineated in both national and international law.

The object is summarized in the following points:

- Define specific commitments regarding respect for and promotion of human rights that serve to measure, evaluate, and detect potential adverse effects that Navantia's activities cause or contribute to. These commitments will aim to prevent, mitigate, and eliminate potential negative consequences in this area in the communities where we operate.
- Establish the general principles necessary to ensure that these commitments are integrated into Navantia's business model and operations management.
- Ensure the alignment of Navantia's regulations with current national and international regulations on Human Rights, as listed in Annex II.



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1.2. SCOPE OF APPLICATION

The Commitment set forth herein applies to Navantia and its workforce, including those who comprise the management team and governing bodies, who are required to know, understand, and comply with the provisions contained in this document. This commitment also extends to the Company's value chain, customers, and key stakeholders.

Individuals who are not part of the Navantia organization will undertake to act in accordance with this commitment when, in the exercise of their duties, they act on behalf of and represent the Company or in its interest and/or on its behalf.

Furthermore, Navantia will encourage its subsidiaries and affiliates to adhere to standards of conduct and values similar to those established in this document, seeking to align its own policies with those of the parent company.

Furthermore, it will also promote and respect human rights in its relationships with the value chain and other stakeholders who interact with Navantia, regardless of the territory in which they operate.

In recognition of Navantia's global operations, this Commitment and its associated actions will adhere to the applicable legal frameworks of the countries in which the Company conducts its business.

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02 | NAVANTIA'S PRINCIPLES OF COMMITMENT TO HUMAN RIGHTS



To achieve its stated objectives, Navantia promotes, respects, and defends Human Rights by embracing the following basic principles. These principles are governed by the national and international legislative framework, as well as by the instruments and best practices referenced in Annex II. The embodiment of these principles is to:

- Establish a procedure to assess the impact of the Company's activities on human rights, as well as the most significant risks in this area. Thereby establishing mechanisms for control, prevention, and mitigation, as well as compensation and reparation, should they arise. Impulsar un modelo de diligencia debida en materia de Derechos Humanos y Medio Ambiente coordinado por Navantia, con aplicación a su cadena de actividades y cadena de valor.
- Promote a due diligence model for human rights and the environment coordinated by Navantia and applicable to its businesses and value chain. Disponer de canales de denuncia de irregularidades, así como de los procedimientos necesarios que garanticen una adecuada comunicación, atención y posterior tratamiento de estos asuntos de especial sensibilidad.
- Incorporate awareness-raising, communication, and training initiatives, both internal and external, that contribute to fostering a culture of respect for and defense of human rights, engaging stakeholders and strengthening their commitment to this matter. This can serve as an example for other organizations to integrate into their own operational policies and work procedures.
- Provide channels for reporting irregularities, as well as the necessary procedures to ensure proper communication, attention, and subsequent handling of these particularly sensitive matters.
- Make human rights commitments to the value chain and to the various stakeholders involved in the Company's activities.

03 | COMMITMENT TO HUMAN RIGHTS

Navantia is a signatory of the United Nations Global Compact. It also collaborates closely with other public and private institutions and initiatives that safeguard human rights and promote the development of labor and environmental standards, as well as the fight against corruption in companies' activities and business strategies.

The principles established for the promotion, respect, and protection of Human Rights are exemplified by Navantia's commitments across its entire value chain. These principles are reflected in the company's initiatives within various operational domains, in collaboration with its stakeholders.

They are specified in the following:

3.1. COMMITMENT TO WORKERS

Navantia provides its entire workforce with a mandatory Code of Conduct, designed to communicate and establish the principles that govern the relationship between professionals and their environment.

Likewise, integrated into the Navantia Management System (SGN), all employees have access to other documents (policies, standards, procedures) that demonstrate the Company's commitment to this matter. Some of these examples are detailed in Annex I of this document.

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This Commitment translates into:

- **Respectful treatment**

All individuals with whom Company professionals interact must be treated with due respect. Navantia rejects any disrespectful, offensive, or derogatory verbal or written actions or statements directed at any individual or group of individuals. It also opposes any humiliating or degrading treatment, intimidation, harassment, or abuse of authority.

- **Violence and aggressive behavior**

Navantia categorically prohibits any type of violent or aggressive behavior. Including aggression, intimidation, threats of physical aggression, or verbal violence.

- **Equal opportunities and non-discrimination**

Navantia supports equal opportunities in the career development of its employees, based on objective criteria of ability and merit, and independent of any non-professional circumstances of the individual.

To this end, as supported by its Second Equality Plan, Navantia guarantees all its professionals equal and non-discriminatory treatment regardless of race, color, religion, sex and sexual orientation, nationality, age, pregnancy, degree of disability, or other legally protected circumstances.

Navantia is firmly committed to its equality policies and encourages its professionals and collaborators to act accordingly. Therefore, understanding and promoting their dissemination and effective implementation.

- **Harassment**

Navantia rejects and prosecutes harassment in the workplace. This includes sexual harassment, moral harassment, harassment based on gender or sexual orientation, or any other behavior that violates human dignity. Its employees must be familiar with and apply the Company's policies for the prevention and prosecution of workplace harassment. In this regard, Navantia has a Protocol for the prevention and response to cases of sexual harassment or harassment based on gender and a Protocol for action against workplace harassment. Both documents are available to all interested parties.

- **Reconciliation of personal, family, and work life**

Navantia is committed to facilitating the balance between personal, family, and work life for its members.

- **Freedom of association and collective bargaining**

Navantia guarantees and promotes freedom of association, freedom of expression, the right to strike, and the right to collective bargaining, recognizing the value of these practices as a means of regulating relations with its workers and their unions.

- **Safety and health**

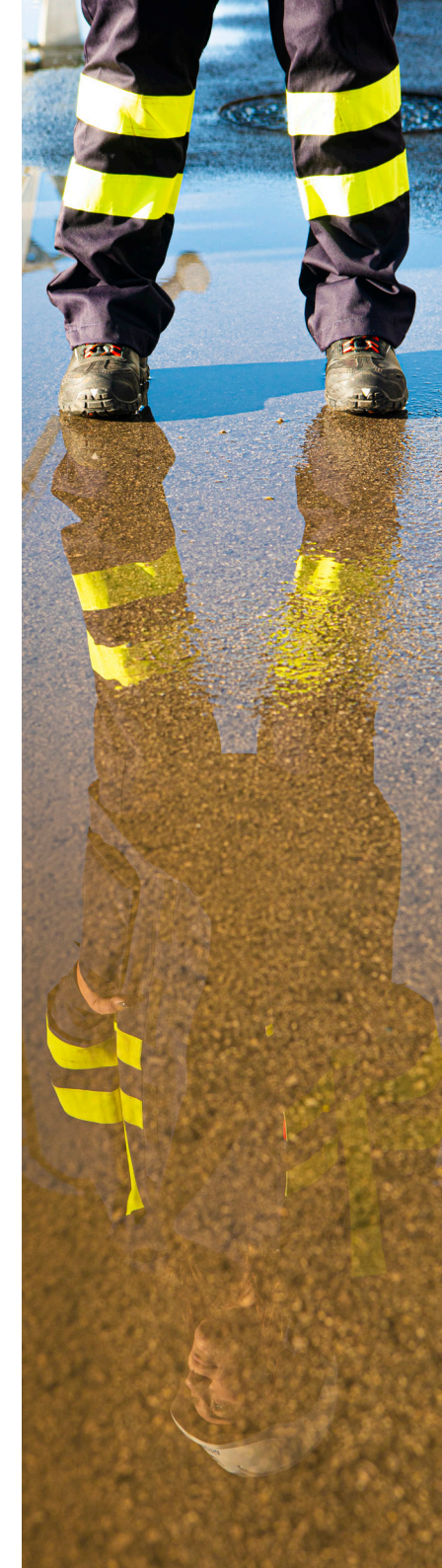
Navantia's commitment to occupational risk prevention and the concept of comprehensive health is part of its corporate culture. To this end, it provides a safe and healthy workplace in all facilities through the adoption of occupational health and safety procedures and regulations, as well as prioritizing organizational well-being initiatives.

- **Forced labor and child labor**

Navantia prohibits and rejects any form of forced labor, with a zero-tolerance approach towards any form of slave labor, child labor or human trafficking ("Modern Slavery"¹) within the Company's operations and value chain, respecting current legal frameworks and guaranteeing working conditions.

- **Personal data**

The Company guarantees the proper use of the information and personal data of all its staff solely for the agreed purposes, treating all data appropriately in accordance with applicable legislation, and safeguarding them with due diligence and security.



3.2. COMMITMENT TO THE VALUE CHAIN

3.2.1. Suppliers and collaborators

Navantia has a supplier evaluation and approval process, and a specific Code of Conduct for all its business partners. These partners, regardless of the location of their headquarters or facilities, are required to observe and respect this code in their interactions with the company. They must actively collaborate to prevent its violation and take responsibility for preventing, detecting, and addressing any situations that may pose risks to Human Rights, whether directly or through subcontractors. The company will not engage with suppliers or collaborators who violate any of the principles related to Human Rights in the conduct of their activities.

In addition to these actions and as part of its risk identification, assessment, and control strategy, Navantia conducts risk analyses for all third parties with which it interacts, whether suppliers or collaborators. In this regard, companies within the value chain are monitored through an alert system to detect incidents related to corruption, the environment, social and labor issues, finance, or regulation. Likewise, and to promote greater compliance with sustainability criteria, periodical supplier performance evaluations focus on environmental, quality, and Occupational Health and Safety parameters.

On the other hand, the Company undertakes to guarantee the use of the information and personal data of its business partners for the agreed purpose exclusively treating all data appropriately in accordance with applicable legislation and safeguarding them with due diligence and security.

¹"Modern Slavery" is used as an umbrella term that encompasses practices such as forced labor and forced marriage. It refers to exploitative situations in which a person finds themselves and is unable to refuse or leave due to threats, violence, coercion, deception, or abuse of power.

3.2.2. Customers

Navantia promotes and disseminates its Commitment to Human Rights among its customers. This Commitment translates into:

- Continuously work to improve safety standards. Proporcionar servicios e infraestructuras seguros y fiables que no comprometan la seguridad e integridad física de sus clientes, en la medida de lo razonablemente previsible, reduciendo el riesgo de daños involuntarios a las personas, la propiedad y el medio ambiente.
- Provide safe and reliable services and infrastructure that do not compromise the safety and physical integrity of its customers, to the extent reasonably foreseeable, reducing the risk of unintentional harm to people, property, and the environment.
- Ensure the use of information and personal data of customers and end users exclusively for the agreed purpose, applying appropriate processing in accordance with applicable law, and safeguarding them with due diligence and security.

3.3. COMMITMENT TO SOCIETY AND LOCAL COMMUNITIES

Navantia is committed to respecting and promoting human rights, promoting actions aligned with its values in the communities in which it operates and with society at large.

This Commitment translates seeks to:





- Limit the impact of its activities on these communities through its security and control policies and processes.
- To foster and promote young people's interest in specialization and training in subjects related to Navantia's activities: science, technology, engineering, and mathematics (STEM). Given Navantia's strategic nature, the company plays a significant role in territorial cohesion through its driving force in local job creation and economic growth in the geographic areas where it operates, thereby improving the socioeconomic situation of these territories and the well-being of their populations.
- Supporting the most vulnerable groups through specific initiatives, collaborating with local organizations aligned with Navantia's values regarding Human Rights.
- Collaborate with associations and organizations that lead initiatives, programs, and actions for the defense of human rights, within current legislation.
- Respect the culture and rights of the communities in which it operates, fostering open and transparent dialogue.
- Provide the necessary resources to ensure that Navantia's activities do not negatively impact the livelihoods of these communities.
- Cumplir con el marco legal de las comunidades
Comply with the legal framework of the communities in which the Company operates, strongly rejecting any type of corruption, both direct and indirect, and following Navantia's anti-corruption policy and guidelines.
- Maintain a fluid and transparent relationship with regulatory bodies and public administrations, in accordance with Navantia's ethical principles.

04 | COMMITMENT TO THE ENVIRONMENT

Environmental protection is one of the guiding principles of action business and one of the most important aspects in the sustainable development of Navantia.

The Company monitors the most significant risks to avoid or reduce the impacts its activities may generate, with the aim of ensuring that existing environmental aspects and associated risks are identified and assessed. To this end, it promotes continuous improvement and implements initiatives that contribute to achieving the Sustainability Goals set by the EU, in line with the Company's Sustainability Policy, such as reducing and offsetting greenhouse gas emissions and protecting the marine environment.

05 | DEPLOYMENT

The Compliance Committee and the Sustainability Committee will coordinate so that, within the scope of the functions related to Human Rights and the Environment, they develop and implement the procedures of due diligence in matters of Sustainability in order to comply with the provisions of the law transposing the European Directive on corporate due diligence in matters of sustainability (CSDDD), approved on April 24, 2024 by the Parliament.²

Navantia will strengthen its procedures to identify, assess, mitigate, and prevent the direct and indirect impacts of its activities on human rights and the environment.

06 | DISSEMINATION AND IMPLEMENTATION OF NAVANTIA'S COMMITMENT TO HUMAN RIGHTS

Navantia is committed to being transparent in regard to Human Rights and publicly sharing its management of this topic in the Corporate Sustainability Report.

Accordingly, this Commitment is available to all Company personnel (including subsidiaries) through the intranet, integrating it into the Navantia Management System (SGN) along with other related documents (policies, standards, procedures). Furthermore, in compliance with the requirements of international standards and transparency practices, the document will be available to interested parties for information and consultation on the Navantia website.

Likewise, the Company undertakes to disseminate its content through training programs and specific events and to supervise its effective implementation, for its understanding and application within the Company, promoting its dissemination so that it is understood by all employees who are part of and represent Navantia.

Likewise, Navantia prepares its Corporate Sustainability Report following the guidelines and indicators of Directive (EU) 2022/2464 of the European Parliament and of the Council of December 14, 2022, which amends Regulation (EU) No. 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, with regard to the presentation of sustainability information by companies and the EFRAG implementation guides,³ regarding the promotion and respect of Human Rights.

³After its submission, each state has a two-year period to transpose it. In Spain's case, it already has the Draft Law on the Protection of Human Rights, Sustainability, and Due Diligence in Transnational Business Activities.

07 | VALIDITY, SUPERVISION, AND MONITORING

The Commitment contained in this document comes into effect the day after its publication in the Navantia Management System.

The Compliance Committee, with the support of the Sustainability Committee, is responsible for oversight and monitoring.



08 | ETHICAL CHANNEL

Through the Ethical Channel, Navantia provides a communication tool so that its staff, suppliers, agents, business partners and other third parties related to the Company can report possible indications or incidents contrary to the law or to the actions set out in the Navantia Code of Business Conduct.

This channel is accessible through the following communication channels:

- Through the forms available on the corporate website.
- Email to: canaletico@navantia.es
- Regular mail addressed to:
NAVANTIA, SA, SME, (Compliance Department)
Calle Velázquez 132, 28006, Madrid
- Through the Navantia intranet
- Via telephone: +34.810.513.626
- Through a face-to-face meeting with the Compliance Committee, one of its members, or the people they have delegated.

Communications can be made anonymously or with personal identification. Navantia ensures the confidentiality of the identity of the informant and any third party mentioned in the communication. The company also guarantees the confidentiality of actions taken during the management and processing of the communication as well as data protection, preventing access by unauthorized personnel.

This mechanism is also available to receive inquiries regarding any questions that may arise regarding the application of the Company's internal rules and procedures related to Regulatory Compliance. To include any questions regarding the interpretation and application of the content contained in this document regarding Navantia's

Commitment to Human Rights. For this purpose, the Company provides two separate

³ European Financial Reporting Advisory Group (EFRAG): A private European association established in 2001 with the support of the European Commission to advise on financial reporting and serve the public interest.

ANNEX I

Navantia has a set of policies and standards that aim not only to comply with applicable regulations but also to incorporate national and international best practices and recommendations in the field of sustainability.

In this way, Navantia's Commitment to Human Rights is complemented by the rest of the internal regulations and policies and, specifically:

- Navantia's Code of Business Conduct
- Navantia's Corporate Governance Code
- Code of Conduct for Business Partners
- Privacy and Protection of Personal Data
- Compliance Manual
- Navantia's Ethics Channel Policy
- Sustainability Policy
- Security Policy
- Risk Policy
- Privacy Policy
- People Management Policy
- Quality, Occupational Risk Prevention, and Environment Policy
- Navantia's Anti-Corruption and Compliance Policy
- Navantia's Second Equality Plan
- Protocol for the prevention and action in cases of sexual harassment or harassment based on sex
- Protocol for action against workplace harassment
- Management's Commitment to Equal Opportunities
- Protocol for the Promotion of Emotional Well-being
- Luxembourg Declaration
- Navantia's Right to Digital Disconnection Protocol



ANNEX II

Below is the most relevant documentation on the Protection of Human Rights:

- International Bill of Human Rights of the United Nations
- United Nations Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- United Nations International Covenant on Economic, Social, and Cultural Rights
- United Nations International Covenant on Civil and Political Rights
- Fundamental Conventions of the International Labour Organization
- United Nations Convention on the Rights of the Child
- United Nations Convention on the Rights of Persons with Disabilities
- Ten universal principles of the United Nations Global Compact on human rights, labor standards, the environment, and the fight against corruption
- Second National Human Rights Plan (2023-2027)
- Charter of Fundamental Rights of the European Union
- Sustainable Development Goals (SDGs) approved by the United Nations in the 2030 Agenda
- United Nations Global Compact
- Guidelines of the Organization for Economic Cooperation and Development for Multinational Enterprises
- Spanish Constitution
- ISO 26000. Social Responsibility Guide
- Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on Corporate Sustainability Due Diligence (CSDDD)
- Proposal for a Regulation of the European Parliament and of the Council prohibiting products produced by forced labour from the Union market, adopted on 24 April 2024
- Modern Slavery Act 2015 (United Kingdom)
- Modern Slavery Act 2018 (Australia)
- As well as any documents and texts that may replace or complement those previously mentioned.





Navantia