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POLICY ON LABOUR PRACTICES AND HUMAN RIGHTS

Seppelec's Executive Management, with the aim of ensuring the effective management of the health, safety and wellbeing of all workers – both its own staff and those of partner companies – has established the guiding principles of this Policy. With a view to achieving continuous improvement, the following qualitative and quantitative objectives are set at all levels of the organisation. These are consistent with the Policy, which serves as a framework for their establishment and review:

Qualitative objectives

Employee health and safety

- To maintain a low rate of workplace accidents.
- To increase training for all workers in occupational health and safety.
- Involve suppliers and subcontractors in occupational health and safety.

Working conditions

- Promote a healthy work-life balance through flexible working arrangements, such as voluntary adjustment of rest periods, access to remote working, flexible start times or reduced working hours to care for children or relatives.

Training and professional development

- Promote professional development through appropriate training, and the attainment and/or renewal of professional certifications that attest to staff's skills and technical qualifications.

Child labour, forced labour and human trafficking

- To comply with and respect the fundamental principles established by the International Labour Organisation (ILO) and the United Nations Guiding Principles on Business and Human Rights, reinforcing our commitment to combating child labour, forced labour and human trafficking, and ensuring that these practices do not occur either in our operations or within our supply chain.

Discrimination and harassment

- To increase training for employees on non-discrimination on the grounds of gender, race, religion, sexual orientation or disability.
- Maintain and implement a protocol for handling complaints of discrimination and workplace harassment, ensuring a confidential, accessible and effective process for all employees.

Quantitative targets

Employee health and safety

- In 2026, keep the number of accidents requiring medical attention below three.
- In 2026, ensure that 20 per cent of the workforce undertakes training in occupational risk prevention, based on the average workforce for 2026.

Working conditions

- By the end of the 2026 financial year, ensure that at least 50 per cent of the average annual workforce has access to at least one formal measure promoting flexibility or work-life balance.

Training and professional development

- During 2026, provide training related to professional development to at least 15 per cent of the average annual workforce performing technical roles (defined as the areas of engineering, sales, project management and quality).
- During 2026, to certify 100 per cent of welders and pipe fitters to carry out butt and fillet welds using manual welding processes (in accordance with the UNE-EN ISO 9606 standard) and orbital welding processes (in accordance with the UNE-EN ISO 14732 standard).
- During 2026, to certify one person from the quality department as a Level II welding inspector using the penetrant testing (PT) technique, in accordance with the UNE-EN ISO 9712 standard, to strengthen in-house expertise in weld inspection.

Child labour, forced labour and human

trafficking Discrimination and harassment

- During 2026, provide training on sexual diversity and workplace inclusion to 5 per cent of the workforce.

Validity and review

This Policy applies to all of Seppelec's activities, both at its own premises and at clients' and third parties' premises. It also applies to suppliers and partner companies providing services on behalf of Seppelec; it will be reviewed annually to ensure it remains up to date.

The HR department is responsible for implementing and monitoring the qualitative and quantitative objectives set out.

Transparency

Progress and results arising from this policy will be documented and reported in Seppelec's Sustainability Report, as part of our commitment to transparency and continuous improvement.

Furthermore, this policy on labour practices and human rights is available to all stakeholders on Seppelec's official website, ensuring its transparency and easy access.

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Signed: Sven Funke

Operations Officer

Alcorcón, 16 January 2026