



HUMAN  
RIGHTS  
POLICY

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*Commitment to respect  
and diversity*

## 1. INTRODUCTION

The CIRSA Human Rights Policy reflects the Company's commitment and responsibilities in relation to human rights and demonstrates a special care in the rights that affect its business activity and operations developed by its employees.

CIRSA promotes the respect for human rights in all its business and commercial relationships, as well as in its relationship with employees, clients, suppliers and partners. For this reason, it shows a special sensitivity to all situations that may create conflict or any type of risk.

CIRSA also establishes a framework of collaboration with suppliers that share its values in the defence of human rights.

### 1.1 External references

The CIRSA Human Rights Policy is structured according to the main international declarations on human rights, such as:

- The International Bill of Human Rights.
  - Universal Declaration of Human Rights.
  - International Covenant on Civil and Political Rights.
  - International Covenant on Economic, Social and Cultural Rights.
- ILO Declaration of Fundamental Principles and Rights at Work.
- United Nations Guiding Principles on Business and Human Rights.
- OECD Guidelines for Multinational Enterprises.
- The ten principles of the United Nations Global Compact.
- The European Convention on Human Rights.



## **1.2 Internal references**

In parallel, this document is structured in line with the Code of Conduct of the Group and the Ethics Line Channel. The Code establishes the Company's main professional and personal behaviour guidelines. It affects all employees and professionals linked to the Company within the framework of its professional activity and is applied to all its subsidiaries and companies, as well as to all its managers, directors and employees, regardless of the geographical location of their occupation, without prejudice to the respect and duty to comply with the laws and good practice of each country.

## **2. PRINCIPLES OF THE HUMAN RIGHTS POLICY**

### **WORKPLACE**

#### **2.1 Rejection of forced or compulsory labour and child labour**

CIRSA firmly and directly opposes the use of forced or compulsory labour, as well as child labour, and ensures the defence of the general interests of society and the rights of minors. In this regard, the Company strives not to incorporate any product or service to its business activity that comes from this kind of labour in any of the communities and countries where it is present. It also establishes mechanisms to work with suppliers and partners that have among their priorities the same objectives to ensure the creation of a sustainable commercial ecosystem.

#### **2.2 Respect for diversity and fighting discrimination in the workplace**

For CIRSA, diversity, dignity, privacy and the personal rights of each individual are fundamental goods to protect. Therefore, the Company works to guarantee the equal and dignified treatment of each and every member of its team and ensures that all are treated with respect through the defence of equal opportunities.

In this regard, the Company does not tolerate and condemns discriminatory practices relating to race, colour, gender, sexual orientation, age, religion, ethnicity, national or social origin, heritage, political opinion, disability or any other reason. CIRSA also operates in the same way with respect to its suppliers and collaborators.

#### **2.3 Fight against harassment and violence**

CIRSA condemns any type of harassment and violence both in the workplace and outside of it. As a result, it promotes a work atmosphere without any form of harassment, violence, abuse or exploitation.

For this, it operates in accordance with the legislation of each country where it develops its activities and, in accordance with the Code of Conduct and the Company's Ethics

Line Channel, it establishes as a priority objective the promotion of a workspace free of harassment and intimidation and offensive and inappropriate behaviours, both sexual and of any other kind, including explicitly sexual propositions or suggestions, taunts and offensive conversations that may offend the dignity of persons for any of the reasons indicated above.



#### **2.4 Promotion of the freedom of association and collective bargaining**

CIRSA respects the diversity of options and visions both within the organisation and outside of it. Therefore, it safeguards the freedom of association and collective bargaining of its employees. In this way, it recognises its employees' right to constitute organisations that aim to defend their interests or to participate in them. It also promotes this principle among its suppliers and collaborators.

#### **2.5 Workplace health and safety**

Guaranteeing the health and safety of employees and collaborators in their working environment is one of the main objectives of CIRSA. For this reason, the Company focuses its efforts on providing a healthy and safe environment and workspace through promoting the following actions:

- Respecting the basic pillars of occupational risk prevention in the Company.
- Rigorous analysis of the accidents and incidents that may be prevented, however insignificant they may seem, in order to identify unsafe actions and hazardous conditions and to determine corrective measures.
- Establishing and implementing an ongoing improvement system through regular and systematic assessment of safety conditions, hygiene, ergonomics, psychosociology conditions and health monitoring.
- Promoting a preventive culture through developing a continuous and progressive training programme related to occupational risk prevention and permanent training of employees and promoting respectful behaviours towards the health and safety of workers.
- Developing and implementing an occupational risk prevention management system in order to ensure full integration in all of the Company's management systems.



- Guaranteeing that all Company decisions comply with the legal and labour framework, as well as internal regulations relating to occupational risk prevention.
- Compliance requirement of prevention standards established to guarantee the safety of employees from other companies that carry out work in our centres.
- Fostering the participation of all employees in promoting health and safety.

In parallel, the Company places its employees and collaborators, and especially those whose activity involves a special risk, to disseminate specific knowledge among its partners to avoid hazardous situations and to promote the compliance with risk prevention regulations.

The Company also promotes measures related to environmental protection in the workplace in order to offer a healthier, more sustainable and energy-efficient environment, that contributes to employee's good quality of life. Among the actions developed in this respect, an advanced waste management system is highlighted and the commitment to renewable energy.



## **2.6 Fair and favourable working conditions**

CIRSA offers its collaborators fair, positive and favourable working conditions. For this, it operates in line with laws on working conditions at each location where it develops its business, such as the basic working day and managing extra hours. Similarly, the Company offers a fair remuneration policy that takes into account collective agreements and labour regulations in force in every country and that provides equal possibilities of promotion and organic growth within the Company and rejects any type of discrimination.

To achieve this, CIRSA promotes training and development programmes related to professional growth and the technical training of its employees, such as Plan Masía, which aims to identify and promote internal talent; the Grow Programme, aimed at employees with a high growth potential; the Corporate MBA, in partnership with business schools, and One Bridge for All, a team building activity that promotes creativity and communication.

## 2.7 Training on compliance and money laundering

CIRSA provides compulsory training on compliance to its teams, both in the induction plan and in the annual training programme, to ensure employee's knowledge of the regulations that govern the sector. The Company also promotes training on money laundering to the Group's employees.

## SOCIAL ISSUES

### 2.8 Respect for the rights of communities

As an international organisation, CIRSA has a firm commitment to respecting all regions where it operates, as defined in the applicable new international and national regulations. In this regard, it operates aligning with the regulations of each territory and creates close collaboration links with the communities it has contact with.

Similarly, CIRSA pays special attention to the more vulnerable communities developing, from its business commitment, solidarity projects, such as promoting solidarity poker events in order to ultimately improve the quality of society. Other activities are also promoted, such as collecting toys and campaigns specific to Christmas or collaborating with social partners in specific projects.



### 2.9 Promoting initiatives related to the proper use of land and water

CIRSA remains firmly committed to the environment and sustainability and works to promote good practices related to the proper use of land and water, such as waste management or the construction of resilient infrastructures, through promoting an inclusive, sustainable industrialisation focused on innovation.



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