

Human Rights Policy



Human Rights Policy

1. Purpose:

The purpose of this policy is to establish the responsibilities that the Company and its associates have to avoid or address any violation of human rights, adhering to the international principles of human rights that are included in the International Bill of Human Rights, the Declaration of the International Labor Organization on Fundamental Principles and Rights at Work, the United Nations Global Compact, and the United Nations Guiding Principles on Business and Human Rights.

2. Scope:

This policy is applicable to Arca Continental S.A.B. de C.V. and its Subsidiaries. The Company has assumed the commitment to collaborate with its value chain so that they support the principles of this Policy and adopt similar policies within their companies.

3. Definitions and abbreviations:

- a) **Arca Continental or the Company:** Arca Continental, S.A.B. de C.V. and its Subsidiaries.
- b) **Due Diligence:** In matters of human rights, it is a way for companies to manage proactively the actual and potential risks of the adverse effects on human rights in which they are involved. It includes four basic components: (a) Identifying and evaluating the actual or potential effects on human rights that the company could cause or contribute to through its activities, (b) Integrating the results of the impact assessments into the relevant processes of the company, and adopting appropriate measures according to their participation in the impact, (c) Monitoring the effectiveness of the measures and processes put in place to counter adverse effects on human rights to find out whether they are working, and (d) Communicating how adverse effects are addressed and demonstrating to stakeholders—particularly those affected—that there are proper policies and processes.
- a) **Human Rights:** Human Rights are the **set** of prerogatives based on human dignity, whose effective realization is essential for the integral development of the person. For Arca Continental, this means that our products, regardless of where they are produced, are made under conditions that demonstrate respect for the people who manufacture them, in addition to respect for the rights of the people who live in the communities near our facilities, and those of our suppliers that may be affected by our operation.
- b) **Diversity:** It is the set of differences and similarities that include individual and organizational characteristics such as values, beliefs, experiences, antecedents,

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preferences and behaviors.

- c) **Union:** Association of workers whose objective is the defense of the professional, economic, and labor interests of the associates.
- d) **Subsidiaries:** Companies in which Arca Continental is the direct or indirect owner of the majority of the shares that form part of their capital stock.

4. Policy Guidelines:

Respect for Human Rights

It commits, through due diligence, to identifying, preventing, mitigating, and communicating adverse impacts on human rights that might arise or be caused by the Company's activities throughout the value chain.

The foregoing with the intention of:

- Providing a basis for incorporating the responsibility to respect human rights in all business functions.
- Responding to the expectations of the relevant stakeholders.
- Identifying gaps in policies and initiating a process that alerts the company to new areas of human rights risk.
- Strengthening the company's commitment to supporting human rights.
- Building greater trust in external stakeholders and beginning to understand and address their concerns.
- Encouraging the development of training, management capacity, and leadership on human rights issues within the company.
- Demonstrating good international business practices.

All associates of the Company must monitor the respect for human rights, for which they must know this policy and obtain sufficient training to allow them to ensure compliance with it and the immediate correction of any violation of such rights that might arise or derive from the Company's activities in which they participate.

Company Approach

Respecting Human Rights is a shared objective across all the Company; hence, the Company has adopted an integrated approach to achieve coherence among its policies. For such purposes, this policy is complemented by other Company policies that contain provisions on human rights in greater depth on specific issues, for example, the Code of Ethics and Conduct Policies.

Considering the above, and through the identification of risks and opportunities, the decision was taken to direct the policy to our entire value chain, including associates, communities,

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and third parties. Below, priority areas of action are highlighted, but in no way restrictively; therefore, they are complemented by the rest of the policies.

- **Relations with the Community and Stakeholders**

Each associate of the Company, in personal compliance with this policy, will be responsible for acting in accordance with it, in such a way as to avoid any impact on the communities in which the Company operates, due to the violation of human rights indicated herein.

Country and business officers must promote a process to identify and address risks and community or social demands, formalizing communication channels to listen, learn, and dialogue with key audiences or organizations where the Company's businesses operate.

Any problem that arises in the communities and that derives from any observation regarding the violation of human rights by the Company or its associates must be handled at the local level, through the Company's representatives who are designated to do so by the director of the country, business or society.

The representatives of the Company who dialogue with the representatives of the communities on issues related to the observance of human rights must evaluate, and, as the case may be, consult with supervisors, any commitment that must be assumed when a breach derives from the activities that are necessary for the Company's business. Nonetheless, they must invariably transmit the generation of economic opportunities that the business causes in the communities, as well as the good will to attend to the observations and improve the conditions of such communities through initiatives of local interest.

- **Appreciation of Diversity**

The Company values and respects the diversity of people, whether they are associates or third parties external to the Company. With respect to the recognition of equal opportunities, tolerance towards others, and avoidance of discrimination and harassment, associates must commit (see the Inclusion and Diversity Policy) and actively show their commitment. All employees of the Company must keep their workplaces free from signs, messages, or articles that suggest discrimination or harassment, be it for reasons of age, gender, sexual orientation, disability, race, ethnicity, origin, religion, economic situation, or because of any other category of discrimination or harassment indicated by applicable laws (see the Inclusion and Diversity Policy).

- **Freedom of Association and Collective Bargaining**

The Company respects the right of its associates to form a union, and join or not join it, without fear of reprisals or of being victims of intimidation or harassment, as long as it complies with each country's laws and regulations applicable to workers in general. Associates who are represented by a legally recognized union, where their representatives have been freely chosen, must have the freedom and the right to establish a constructive dialogue with the Company. The Company, through its

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representatives, assumes the commitment to negotiate in good faith with the representatives of associates who have joined a union.

- **Safe and Healthy Workplace**

All Company associates have the right to a safe and healthy workplace that complies with current laws, regulations, and internal requirements on health and safety. To make this right effective, associates must maintain a productive workplace and be jointly responsible for minimizing the risk of accidents and injuries, with the obligation not to expose themselves to risks that affect their health.

The Company's associates must also co-participate to improve continuously health and safety in the various workplaces and are also responsible for identifying risks and executing programs to work on solving problems related to their health and safety. All associates must respect this right, both with other collaborators of the Company and with third parties external to it (see the Safety and Wellbeing Policy).

- **Workplace Free of Violence**

The responsibility to maintain a workplace without violence, without harassment, without intimidation, and without any other condition that is unsafe or disruptive for the Company's associates due to internal and external threats, rests with the various directors the Company has designated for this purpose, mainly the Executive Director of Human Capital. Associates must have at their disposal the necessary security guarantees, with the premise of respect for their privacy and dignity. All associates must respect this right both with regard to other associates of the Company and with regard to third parties external to it. (Also, see the Sexual Harassment and Harassment Policy.)

- **Forced Labor and Human Trafficking**

The Company prohibits all forms of forced labor, including prison labor, work under a mandatory performance contract or debt bondage, of a military nature, or equivalent to slavery, and any other form of human trafficking. All associates have the right to decent and remunerated work according to their skills and abilities, and their hiring must comply with the laws and other regulations that exist not only in the countries in which they work, but even those derived from the guidelines and regulations that are mentioned in the purpose of this policy.

- **Child Labor**

The Company prohibits child labor throughout its value chain, so all its associates must be recruited and selected only after they have reached the age of majority to work, as defined by the laws and regulations of the countries in which the Company operates. The direct or indirect hiring of persons under the age of 18 years for positions that involve the performance of Company tasks is prohibited. The Company, through the associates who have relationships with third parties that participate in its value chain, will extend its influence to avoid the violation of this human right.

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- **Working Hours, Wages and Benefits**

The areas defined by the Company for the design and determination of fair compensation to the Company's associates have the obligation to ensure that such compensation is competitive in relation to the industry and the local labor market, for which they must have the necessary studies that demonstrate compliance with said responsibility. The various directors of the Company must ensure that the compensation to all associates is determined in absolute compliance with the applicable laws regarding wages, working hours, overtime, and benefits.

5. Vigilance and Compliance with the Policy:

The directors, areas, or associates of the Company defined as responsible for the human rights indicated in this policy being respected and put into practice are responsible for monitoring, complying with and enforcing such policy. All the directive and managerial areas of the Company are also responsible for ensuring that this policy be a reality, in close collaboration with those directly responsible for its implementation and monitoring.

Likewise, such directors, areas or associates are responsible for the Company's associates complying with the provisions of this policy, including the necessary training for said associates so that they can understand and ensure compliance with this policy, and, where appropriate, collaborate as ambassadors of the Company within the communities in which it operates.

6. Consequences or Sanctions for Lack of Compliance with the Policy:

Any breach of this policy must be reported to the Talent and Human Capital Directors. Failure to comply with the provisions of this policy by any of the responsible parties may result in discipline, up to and including termination of employment in accordance with the Code of Ethics of Arca Continental and any other applicable Law.

Changes Log POL-GG-CHU-TTO-003:

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Date of last update:	May 1, 2025
Initial effective date of the update:	May 1, 2025
Director responsible for the issue or update:	Talent Director (HR)

Any associate who reasonably suspects or becomes aware of conduct that deviates from this policy is encouraged to make a complaint to any manager or by any other means, including the Transparency Mailbox, through the following options:

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1. The “Transparency Mailbox” on the corporate intranet or on the Arca Continental web page <https://www.buzondetransparenciaac.com/>
2. The toll-free phone lines:
 - In Argentina: 0800-345-2036
 - In Ecuador: 1-800-001-684
 - In the USA: 1-833-761-8291
 - In Mexico: 800-880-0754
 - In Peru: 0800-74684