

Human Rights Policy of the Línea Directa Aseguradora Group



línea directa

Name of policy	Human Rights Policy
Sections of the Code of Ethics Developed	VI.1 Human Rights and Public Freedoms VI.2 Respect, Dignity, and Non-Discrimination
Sections of Other Policies Developed:	-
Superseded Regulations	-
Related Regulations	Code of Ethics, Supplier Code of Conduct, Recruitment Policy, Gender Equality Policy, Diversity Policy, Digital Disconnection Policy
Business Unit or Function Affected	The entire Línea Directa Aseguradora Group
Personnel affected	The entire Línea Directa Aseguradora Group
Main person responsible for monitoring	Sustainability Committee
Approved on	15 October 2020
Effective from	16 October 2020
Version	1.2
Review Dates	April 2023 and February 2025 (Board of Directors)
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Approved by	Board of Directors of Línea Directa Aseguradora S.A.

HUMAN RIGHTS POLICY

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1. INTRODUCTION

This Policy is intended as a guide to help ensure due protection and respect for human rights through principles and courses of action to identify, prevent, mitigate and repair possible negative impacts.

The Board of Directors of Línea Directa Aseguradora, S.A. ("Línea Directa" or the "Company") hereby declares its commitment to human rights, inspired by the premises enshrined in the UN Guiding Principles on Business and Human Rights and following both national requirements (National Action Plan on Business and Human Rights – Plan de Acción Nacional de Empresas y Derechos Humanos) and European rules (EU Action Plan on Human Rights and Democracy 2020-2024).

Although Línea Directa considers that the protection of human rights rests largely on the shoulders of governments and the powers of state, it also believes that as a company it has the responsibility to respect and promote such rights in its sphere of action and along its value chain.

2. PRINCIPLES OF ACTION

Línea Directa undertakes to respect the internationally recognised human rights enshrined in:

- The International Bill of Human Rights of the United Nations (UN).
- The ILO Declaration on Fundamental Principles and Rights at Work, as well as its core conventions (including freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation).
- The OECD Guidelines for Multinational Enterprises.
- The European Convention on Human Rights.

3. SCOPE AND FIELD OF APPLICATION

The principles set out in this document apply to all employees, executives, and directors of all companies that form part of the Línea Directa Aseguradora Group, as well as the Línea Directa Foundation, in accordance with the applicable regulations. In this context, the Company will also promote that its partners and other parties involved in its operations, products, and services respect the contents of this Policy.

4. LÍNEA DIRECTA'S COMMITMENTS ON HUMAN RIGHTS

This Policy establishes Línea Directa's framework for action on Human Rights in relation to five areas:

4.1 LÍNEA DIRECTA AS AN EMPLOYER

Línea Directa's commitments and people management strategy, as well as its recruitment and talent development policies, are based on respect for diversity, equal opportunities, meritocracy, and non-discrimination on the grounds of gender, race, age, disability, or any other circumstance. Accordingly, the Company considers itself responsible for ensuring:

- Respect for and protection of fundamental rights related to personal

integrity.

- Promotion of diversity, inclusion, and equal opportunities.
- Protection against harassment, discriminatory behavior, and/or abuse of authority.
- Freedom of expression and opinion.
- Respect for freedom of association and collective bargaining.
- Remuneration that ensures human dignity and the principle of equal pay for women and men in jobs of equal or comparable value, in accordance with applicable regulations.
- Compliance with current occupational health and safety legislation, promoting and implementing the necessary measures.
- Respect for employees' right to personal data protection and privacy.
- A work environment free from harassment, abuse, intimidation, or violence.
- A working schedule that is respectful and in line with applicable labor regulations.
- Promotion of professional development and training.

4.2 LÍNEA DIRECTA AS A COLLABORATOR AND PARTNER

Línea Directa requires its suppliers and partners to strictly respect Human Rights and the Supplier Code of Conduct, encouraging them to adopt practices aligned with its Values and to pass them on to their employees and value chain. In this regard, the Company promotes and includes in its practices:

- Awareness and respect by suppliers and business partners for the ethical, social, and environmental standards set out in the Supplier Code of Conduct.
- Dissemination of this Policy among suppliers and business partners to promote the application of its principles in their activities.
- Requiring commitment to respect Human and Labor Rights, as well as to prevent corruption, as a prerequisite for supplier approval, evaluation, and contracting.
- Adoption of corrective actions to address non-compliance with expected standards.

- Adoption of responsible practices that generate mutual value, with a focus on efficiency and quality in the products and services provided by Línea Directa Aseguradora Group collaborators.
- Implementation of controls to monitor that the value chain complies with the Company's principles and values, the Supplier Code of Conduct, and the principles established in this Policy.

4.3 LÍNEA DIRECTA AS AN INSURER

Línea Directa assumes the following commitments as an insurance company in its relationship with clients, including potential ones:

- Providing transparent, honest advice and complete, truthful information about the Company's products and services, including pre-contractual information.
- Establishing a balanced and clear relationship, developing products and services that are tailored to clients' needs and circumstances, ensuring non-discrimination of current and potential clients, and promoting innovation to improve access to insurance for a wide range of groups.
- Ensuring quality, accessibility, and relevance of service within agreed timeframes.
- Compliance with regulations on personal data use and protection of confidentiality, privacy, and clients' right to data protection.

4.4 LÍNEA DIRECTA AS AN INVESTOR

Línea Directa is actively committed to integrating ESG (Environmental, Social, and Governance) criteria, particularly regarding Human Rights, into its investment decision-making.

With this preventive and long-term approach, the Company will avoid investing in organizations, projects, or products that may encourage or cause serious Human Rights violations.

To this end, it will have the necessary resources and mechanisms to carry out appropriate evaluations in this area.

4.5 LÍNEA DIRECTA AND ITS ENVIRONMENT

Línea Directa is committed to the economic and social development of the areas where it operates, recognizing that the sustainability of its business model is directly linked to the prosperity of the regions in which it conducts its activities.

Therefore, it commits to:

- Comply with applicable laws and collaborate and engage in dialogue with public and administrative institutions to promote and respect Human Rights.
- Acknowledge the impact of its activities on society, assessing and managing non-financial, ethical, governance, reputational, social, and environmental risks, in line with the general commitments outlined in this Policy, with a particular focus on those related to Human Rights.
- Develop partnerships with public or private entities, including through the Línea Directa Foundation, that promote a positive impact on Human Rights.
- Disseminate international Human Rights principles within its sphere of influence and, to that end, collaborate where possible with other institutions, international organizations, and government bodies.
- Promote and disseminate initiatives and programmes that make a positive contribution to human rights and the Sustainable Development Goals of the United Nations (SDGs), which seek to eradicate poverty, care for the planet and ensure peace and prosperity for all.

5. MANAGEMENT MODEL

Línea Directa will work to ensure the effective implementation of this Policy and will assess the risk of non-compliance in the environments in which it operates. The Company has a due diligence model that allows it to identify, understand, and evaluate the impacts its activities may have on Human Rights, to prevent and avoid negative externalities, and, where applicable, to mitigate them as much as possible.

In the due diligence processes prior to formalizing agreements with suppliers or of any other nature, Línea Directa is committed to evaluating the Human Rights policies and practices and the codes of conduct of its counterparts.

Likewise, adequate resources will be ensured for the prevention and mitigation of risks in all activities and areas of operation through the implementation of identified corrective measures, as well as the responsibility for monitoring such measures.

If a possible breach of the commitments set out in this Policy is detected, Company professionals are obliged to report it and may do so confidentially or anonymously, and without fear of retaliation, through the whistleblowing channel provided by the Code of Ethics.

This same channel is available to any stakeholder of the Company under the same conditions.

Breaches detected in relation to respect for Human Rights will be analyzed in accordance with internal procedures, legal regulations, and applicable agreements, and may result in disciplinary measures.

The following internal documents complement and are linked to the principles set out in this Policy:

- Code of Ethics
- Supplier Code of Conduct
- Selection Policy
- Protocol for the Prevention and Action in Situations of Psychosocial Risks
- Diversity and Inclusion Policy
- Gender Equality Policy
- Sustainability Policy
- Social Contribution Policy
- Investment Guidelines

6. GOVERNANCE AND MONITORING MODEL

The Board of Directors will provide guidance, oversight, and control of the Policy, strategy, and results related to Human Rights.

The Sustainability and Reputation Committee will be responsible for monitoring and oversight in this area, defining or modifying the action plan, and tracking objectives.

The definition of the Human Rights commitment, coordination of reporting, and communication of the Policy will be the responsibility of the Communication and Sustainability Department.

Responsibility for integrating the Policy into daily operations—by establishing action plans, objectives, and monitoring indicators—is distributed across different areas:

- In the Company's role as an employer, the People and Internal Communication Department is responsible.
- In its relationship with partners, the Finance Department, along with the Compliance and Risk Management functions, are involved.
- As an insurer, the business units are involved.
- As an investor, the Finance Department is responsible.
- As a Company committed to the environment, the Communication and Sustainability areas and the Línea Directa Foundation are all involved.

The content of this Policy, which has been developed with external expert advice, will be subject to periodic review, and changes or modifications will be made as deemed appropriate.

7. POLICY COMMUNICATION



This Policy will be communicated to all members of the Group and will be made available to the organization's stakeholders via the intranet and on the corporate website.