

Human Rights Policy of the Línea Directa Aseguradora Group



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Name of policy	Human Rights Policy
Related section of the Code of Ethics	VI.1 Human rights and civil liberties VI.2 Respect, dignity and non-discrimination
Related section of other policies	-
Rules and standards superseded	-
Related rules and standards	Code of Ethics, Supplier Code of Conduct, Selection Policy, Gender Equality Policy, Diversity Policy, Right to Disconnect Policy, etc.
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 and Reputation Committee
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Created by	People & Internal Communication, Compliance & Corporate Governance, Communication & Sustainability
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

The principles set out in this document apply to all employees, managers and directors of all companies that make up the Línea Directa Aseguradora Group, as well as the Línea Directa Foundation, in accordance with applicable law and regulations. The Company shall also seek to ensure that its collaborators, partners and any other persons related to its operations, products and services likewise honour the principles and commitments contained in this Policy.

4. COMMITMENTS AND RESPONSIBLE PRACTICES

This Policy sets out Línea Directa's framework for action in the realm of human rights in five key areas:

4.1 Línea Directa as an employer

Línea Directa's people management strategy and talent selection and development policies and all other related commitments are based on respect for diversity, equal opportunities, meritocracy and non-discrimination for

reasons of gender, race, age, disability or any other circumstance. Thus, the Company believes it is responsible for ensuring:

- Respect for and protection of fundamental rights relating to personal integrity.
- Promoting diversity, inclusion and equal opportunities.
- Protection against harassment, discriminatory attitudes and/or abuse of authority.
- Freedom of expression and opinion.
- Respect for freedom of association and collective bargaining.
- Remuneration that ensures human dignity, in accordance with applicable employment law and regulations.
- Compliance with current legislation on occupational health and safety by promoting and implementing all necessary measures.
- Respecting the right of its employees to the protection of their personal data and privacy.
- Enabling a work environment that is free from harassment, abuse, intimidation or violence.
- Promoting respectful working hours in accordance with prevailing employment law and regulations.
- Promoting professional development and training.

4.2 Línea Directa as a collaborator and partner

Línea Directa requires all suppliers and partners to strictly respect human rights and the Supplier Code of Conduct, encouraging them to embrace behaviours that are aligned with the values of Línea Directa and to transmit them in turn to their employees and along their own value chain.

The Company therefore promotes and seeks to ensure:

- Knowledge and respect among its suppliers and business partners for the ethical, social and environmental standards set out in the Supplier Code of Conduct.
- Dissemination of this Policy among its suppliers and business partners to help ensure that they apply the principles contained in this Policy when carrying on their business.

- Insistence that all suppliers and partners show respect for human and labour rights, as well as the prevention of corruption, as a essential requirement for their assessment, approval and eventual selection.
- Adopting the necessary corrective action to mitigate non-compliances with the standards expected of suppliers and partners.
- Adopting responsible practices that generate mutual value, while also focusing on the efficiency and quality of the products and services provided by the collaborators of the Línea Directa Aseguradora Group.
- Implementing controls to ensure that the value chain complies with the Company's principles and values, with the Supplier Code of Conduct and with the principles set out in this Policy.

4.3 Línea Directa as an insurer

As an insurer, Línea Directa undertakes the following commitments in its relations with customers, including potential customers:

- Providing transparent, honest advice and complete and truthful information on the nature and features of the Company's products and services, with all such information to be provided before the product is acquired.
- Building a well-balanced and clear relationship by developing products and services that cater to the needs and circumstances of customers, ensuring non-discrimination between existing and potential customers, while also seeing to it that the insurance products are innovative so that they reach out to as many segments of society as possible.
- Quality, accessibility and relevance of the service within the agreed timeframe.
- Compliance with applicable law and regulations governing the use of personal data and the protection of confidentiality, the right to privacy and the privacy of customer data.

4.4. Línea Directa as an investor

Línea Directa is actively committed to making ESG (environmental, social and good governance) criteria and more precisely human rights concerns part of its investment decision-making.

Thanks to this preventive approach and long-term vision, the Company will avoid any involvement as an investor in organisations, projects or products that may cause, or otherwise be conducive to serious violations of human rights.

To this end, it shall have the necessary resources and mechanisms in place to carry out appropriate assessment in this area.

4.5 Línea Directa and its environment

Línea Directa is involved in the economic and social development of the environment in which it operates, on the clear understanding that the sustainability of the Company's business model is directly linked to the prosperity of the territories in which it operates.

With this in mind, it undertakes to:

- Comply with applicable laws and collaborate and liaise with public and administrative institutions to promote and respect human rights.
- Assume the impact that its activities generate on society by assessing and managing non-financial, ethical, governance, reputational, social and environmental risks, as per the general commitments set out in this Policy and focusing especially on those related to human rights.
- Build partnerships with public and private entities —doing so also through the Línea Directa Foundation— to ensure a positive impact in the realm of human rights.
- Disseminate international human rights principles within its sphere of influence and collaborate towards this goal with other institutions, international organisations and government bodies to the fullest extent possible.
- 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 shall work to ensure the effective implementation of this Policy and will assess the risk of non-compliance across all environments in which it operates.

The Company shall ensure that it has a due diligence model in place to identify, understand and assess the human rights impacts of its activities, prevent negative externalities and mitigate them as far as possible should they occur.

As part of the due diligence processes prior to entering into agreements with suppliers, Línea Directa shall appraise the human rights policies and practices and codes of conduct of its counterparties.

It shall likewise ensure that adequate resources are in place to anticipate and mitigate risks in all activities and areas of action by implementing and then monitoring the corrective measures to have been identified.

If any Company employee notices a possible breach of the commitments set out in this Policy, he or she must report the matter, with the option of using, confidentially or anonymously and without fear of reprisal, the whistleblower channel set up under the Code of Ethics.

This channel is also available to any of the Company's stakeholders under the same conditions as for employees.

Any non-compliances detected in connection with human rights will be analysed in accordance with internal procedures, legal regulations and applicable collective bargaining agreements, and may lead to 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 of Psychosocial Risks
- Diversity and Inclusion Policy
- Gender Equality Policy

- Sustainability Policy
- Social Contribution Policy
- Investment Guidelines

6. GOVERNANCE MODEL AND MONITORING

The Board of Directors shall implement, oversee and control the Policy, strategy and results in connection with human rights.

The Sustainability and Reputation Committee shall carry out control and monitoring activities in this realm and shall draw up or modify the action plan and track the objectives.

The Communication and Sustainability Committee will be tasked with defining the Company's commitment in relation to human rights and shall coordinate the process of reporting and communicating the Policy.

Responsibility for making this Policy part of the Company's day-to-day operations —through action plans, objectives and indicators— is distributed among various areas and departments:

- The People and Internal Communication department is responsible when the Company is acting as employer.
- In its relations with collaborators and partners, it is the task of the Compliance and Risk Management functions.
- As an insurer, the business units are involved.
- As an investor, it is the Finance department.
- As a company committed to the environment, the Communication and Sustainability areas and the Línea Directa Foundation are all involved.

This Policy has been drawn up with the support of an external adviser and will be reviewed periodically and changes or modifications will be made as and when deemed appropriate.

7. COMMUNICATION OF THE POLICY



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This Policy will be communicated to all Group members and employees and will also be made available to stakeholders via the Intranet and on the corporate website.

This Policy will be effective from date of publication.

This Policy was approved by the Board of Directors of Línea Directa Aseguradora S.A. on 15 October 2020.