

## INTERCAMBIADOR TRANSPORTES PRÍNCIPE PÍO, S.A.

# Human rights due diligence policy and associated procedures consistent with the [draft] EU Taxonomy minimum safeguards

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We are a responsible company that believes in fair competition and transparent business processes and operating in compliance with applicable law and regulations including compliance with the letter and spirit of tax laws and we expect our business partners to operate to the same standards. We believe that all people employed, either directly or indirectly, to help us deliver [Project Name] should be treated fairly and have their human rights fully respected.

We will take steps to ensure, as far as possible, that those people employed in the delivery of [Project Name], do not have their human rights infringed and if we become aware of any infringements we will take steps to address any adverse impacts.

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We expect INTERCAMBIADOR TRANSPORTES AVENIDA DE AMÉRICA SAU and the Avenida de América hub associated supply chain to comply with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

In order to minimise the risks of working with suppliers that do not comply with our requirements we have adopted the following processes:

### A) Employment of New Contractors

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Before entering into any new contracts involving the delivery of services in relation to [the Project] project we will undertake the following due diligence:

- 1) We will check that the company to be employed has a Whistle-blower and Grievance policy
  - 2) We will check that the company has a stakeholder engagement approach which includes
    - a. Identification of stakeholders that the company impacts
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- b. An approach to establishing the different impacts the company has on the various stakeholder groups with an objective to minimise negative impacts
  - c. Identifies an appropriate level and method of engagement for each group
  - d. Communication, consultation, involvement as appropriate
  - e. Communicates engagement outputs and associated action plans
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- 3) We will check that the company has an appropriate Health & Safety Management system
  - 4) We will check that the company has appropriate policies, and associated procurement and supply chain monitoring practices in place to protect employees and respect their human rights including freedom of association, inclusion and diversity, employee engagement, labour standards and working conditions.
  - 5) We will check that the company has an anti-bribery and corruption policy
  - 6) We will check for any evidence of breaches of the above policies and procedures and if found check whether they have been appropriately remediated and measures taken to avoid recurrence.
  - 7) We will check if any convictions have been made against the Company including in relation to labour law, human rights, environmental law, tax payments, corruption and anti-competitive practices.
  - 8) In addition, we will check that the Company has the same appropriate policies, and associated procurement practices as described for their own supply chain, sub-contractors and suppliers.
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#### B) Periodic reviews

On an annual basis, or more frequently if any concerns arise, we will undertake a review of our Contractor processes and policies to check compliance with their policies and processes as per A) above. If a lack of appropriate policies or processes is found or breaches identified the [Project / company] will take steps to remediate the non-conformities by engaging with the relevant contractor.

#### C) Breaches

Where issues are identified these will be recorded by the [project company] along with actions taken to remediate the breaches. Additional due diligence checks will be carried out as appropriate to track any recurrence.

Signed

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Date: 15/03/2023

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