



## COMPLIANCE WITH LABOR RIGHTS

FIVEBIOENERGY, S.L.

## 1. Purpose and Scope

This compliance with labor rights policy (the “**Policy**”) establishes the commitment of Fivebioenergy, S.L. (“**Fivebioenergy**” or the “**Company**”) to uphold and promote fundamental labor rights and ethical working conditions across all operations. It applies to all employees, contractors, and partners acting on behalf of the Company, in Spain and abroad, and aligns with Spanish legislation, EU directives, and international conventions.

The Policy is grounded in the following regulatory and normative frameworks:

- *Real Decreto Legislativo 2/2015* (Statute of Workers).
- *Ley Orgánica 3/2007, de 22 de marzo, para la igualdad efectiva de mujeres y hombres* (Organic Law on Equality between Women and Men).
- *Ley 31/1995, de 8 de noviembre, de Prevención de Riesgos Laborales* (Occupational Risk Prevention Law).
- *Convenios fundamentales de la Organización Internacional del Trabajo* (ILO Core Conventions on freedom of association, elimination of forced and child labor, and non-discrimination).
- *Pacto Mundial de las Naciones Unidas, Principios 1-6* (UN Global Compact Principles 1–6).
- *Estándares GRI y Directiva sobre Información Corporativa en Materia de Sostenibilidad* (GRI Standards and EU Corporate Sustainability Reporting Directive (CSR)).

## 2. Core Principles and Commitments

Fivebioenergy recognizes that the protection of labor rights is fundamental to its sustainable growth and reputation. The Company commits to:

- **Fair and legal employment:** Ensure that all employment relationships comply with applicable labor legislation, including transparent contracts, fair remuneration, and regulated working hours.
- **Freedom of association and collective bargaining:** Respect employees’ right to freely organize, join unions, and engage in collective bargaining without discrimination or retaliation.

- **Non-discrimination and equal opportunities:** Promote a work environment free from discrimination based on gender, age, origin, religion, disability, sexual orientation, or political opinion.
- **Health, safety, and well-being:** Maintain a preventive culture of occupational risk management, ensuring safe, healthy, and ergonomically adequate workplaces.
- **Prohibition of forced and child labor:** Explicitly reject any form of forced, bonded, or child labor, both within the Company and throughout the supply chain.
- **Human dignity and respect:** Uphold respectful treatment, privacy, and human dignity in all interactions, reinforcing the ethical foundations of the Company.

### 3. Responsibilities and Governance

The People Department and Compliance Risk Committee share primary responsibility for the implementation of this Policy.

- The People Department ensures compliance with labor laws, manages fair employment practices, and coordinates training on workers' rights.
- The Compliance Risk Committee monitors adherence to international labor standards and evaluates supplier compliance.
- All managers and supervisors are accountable for upholding these principles in their teams and reporting any non-compliance or unethical practices.

### 4. Monitoring, Reporting, and Continuous Improvement

Fivebioenergy maintains internal mechanisms to monitor compliance with this Policy, including:

- Periodic employee satisfaction surveys.
- Grievance and whistleblowing channels guaranteeing confidentiality and protection against retaliation.
- Annual reviews by the Compliance Risk Committee to ensure continuous improvement and adaptation to regulatory or operational changes.

Through this Policy, Fivebioenergy reinforces its mission to combine industrial excellence with ethical and socially responsible employment practices, contributing to the sustainable development of the circular economy.