



# Human Rights Policy

**Brisa Auto-Estradas**

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## 1. CONTEXT

Brisa Auto-Estradas de Portugal, S.A. (hereinafter "BAE"), recognizes its fundamental responsibility to respect, promote and protect Human Rights in all its operations and business relationships. As a leader in the road infrastructure and mobility services sector, Brisa recognizes that its activities have a direct impact on the lives of people and the communities where it operates. This Policy reflects its commitment to conducting business ethically and responsibly, respecting the Human Rights of all individuals with whom it relates in the exercise of its activities.

### 1.1. Objective

O objetivo desta Política é formalizar o compromisso da Brisa com os Direitos Humanos consagrados internacionalmente (ver Capítulo 2. Compromisso), estabelecendo princípios objetivos e claros na defesa, promoção e proteção dos Direitos Humanos nas suas operações e nas respetivas cadeias de valor, em todas as geografias onde atua, em harmonia com os restantes normativos internos, periodicamente revistos para garantir o alinhamento com a evolução das normas, recomendações, princípios e regras aplicáveis nesta matéria.

### 1.2. Scope of de Action

This Policy is drawn up by BAE, as the parent company of the Brisa Group, and is directly applicable to all its employees and members of corporate bodies (hereinafter referred to as Employees). This Policy also applies to Brisa in its relations with suppliers and other subcontractors.

### 1.3 Governance and Accountability

The implementation and enforcement of this Policy will be overseen by BAE's Sustainability and Communities Unit (BAE/DSC).

The Executive Committee (EC) is responsible for taking decisions on Human Rights' matters, based on the proposals presented by the BAE/DSC.

BAE/DSC is responsible for tracking, monitoring and evaluating the implementation of this Policy, as well as presenting and reporting the activity carried out and the evolution of the approved measures.

## 2. COMMITMENT

Brisa demonstrates its commitment to respect all Human Rights, complying with its internal policies and applicable national and international regulations, namely:

- (i) Directive (EU) on Corporate Sustainability Due Diligence (CSDDD);

- (ii) Universal Declaration of Human Rights;
- (iii) International Covenant on Civil and Political Rights;
- (iv) International Covenant on Economic, Social and Cultural Rights;
- (v) International Labour Organization (ILO) Declaration on Principles and Rights at Work;
- (vi) ILO conventions ratified by Portugal;
- (vii) Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises;
- (viii) Guiding Principles on Business and Human Rights (UNGPs).

Aligned with the guidelines and recommendations referenced above, Brisa is committed to the prevention, protection, and remediation of Human Rights' violations within the scope of its activities.

To ensure effective implementation of this Policy, Brisa will adopt specific measures to monitor and verify compliance, extending its application throughout the value chain. This approach prioritizes the risk assessment on individuals, rather than focusing solely on company risks.

Based on comprehensive risk assessments and the strategic commitments undertaken, Brisa has identified the following key action areas:

- **Road Safety:** Brisa is dedicated to promote safety on motorways for all users, primarily through the provision of high-quality infrastructure and rigorous operational standards. The company is also committed to promote information and awareness campaigns that encourage a responsible driving behaviour.
- **Safety and Health:** Brisa strives to cultivate a safe and healthy work environment for all Employees, without exception, by strictly adhering to established safety, health, and well-being protocols. The company ensures that all Employees are fully informed of workplace safety and health regulations and that these standards are consistently upheld in all activities. Furthermore, Employees are expected to serve as advocates for these guidelines, both within the organization and in interactions with external partners.

Additionally, Brisa is committed to ensure that safety and health standards are maintained by its service providers, thereby guaranteeing that all individuals involved in the group's operations—including Value Chain Workers—work in a safe and healthy environment.

- **Child, Forced, Undeclared or Compulsory Labour:** Brisa unequivocally rejects all forms of child labour, forced labour, human trafficking for labour exploitation, and slavery. The company is committed to ensure its operations are entirely free from such practices and works closely with its value chain to assess and address risks related to forced labour, labour exploitation, or child labour. Recognizing that migrant populations are amongst the most vulnerable groups, Brisa commits itself to implement specific measures to prevent abuses and promote decent working conditions, ensuring no worker is exploited or coerced.

- **Fair Working Conditions:** Brisa ensures strict compliance with labour legislation, not only for its Employees but also for Workers throughout the Value Chain. The company is dedicated to promote a living wage to support an adequate standard of living for all individuals involved in its operations.

Brisa also assumes responsibility for respecting the right to rest and leisure, implementing measures which guarantee Employees' rest periods, promoting overall well-being through initiatives that support work-life balance.

- **Alignment of Suppliers with Brisa's Commitments:** Brisa adopts mechanisms such as the Supplier Code of Conduct to ensure the promotion and respect for Human Rights. The company is committed to raising awareness among suppliers about the importance of Human Rights protection, identifying key risks of violations associated with contracted activities, and implementing both preventive and mitigating measures in supplier contracting processes. Additionally, Brisa guarantees that its contracting and negotiation practices with suppliers are fair, transparent, and balanced.
- **Fair Recruitment, Selection and Integration Practices:** Brisa ensures that recruitment, selection, and integration processes for Employees are conducted in a transparent and inclusive manner, free from any form of discrimination. All candidates are evaluated based on objective criteria, thereby promoting equal opportunities for all.
- **Work Environment Free of Discrimination and Harassment:** Brisa unequivocally rejects all forms of discrimination, whether based on origin, gender, age, sexual orientation, disability, religion, political opinion, or any other personal or social characteristic of diversity or vulnerability. The company is committed to maintain a safe work environment, free from any form of violence, harassment, or intimidation. Brisa fosters a culture in which everyone can freely express concerns related to these matters, supported by a Whistleblowing Channel dedicated to this purpose. The company enforces zero tolerance for any retaliatory acts, in accordance with the Irregularity Reporting Regulation.
- **Diversity, Equity and Inclusion:** Brisa implements initiatives to strengthen its organizational culture, grounded in respect for and appreciation of diversity, equity, and inclusion. These principles, safeguarded in the Code of Ethics and Conduct, apply to all Employees, including in recruitment, evaluation, promotion, remuneration, and other benefits, as well as transfers and labour force reductions.
- **Freedom of Association and Collective Bargaining:** Brisa promotes universal Human Rights, including freedom of association and the right to collective bargaining, for both its Employees and Workers throughout the Value Chain. The company maintains open, responsible, and constructive dialogue with trade unions and workers' representatives, ensuring a work environment that values active participation and the defence of labour rights.
- **Privacy:** Brisa is committed to ensure compliance with the Brisa Group's Personal Data Processing and Protection Policy and Standards, guaranteeing that all personal data—regardless of origin or purpose—is handled securely, ethically, and in accordance with applicable legal provisions and regulations. To this end, Brisa adopts practices that promote the adequate, transparent, and responsible processing of all personal data collected, used, or retained in the course of its activities.
- **Communities and the Environment:** Brisa is dedicated to transform the quality of life in communities by connecting people through simple, safe, and sustainable mobility solutions. In this regard, Brisa



affirms its commitment to communities, particularly through the implementation of consultation and dialogue mechanisms, as well as welcoming and resolving feedback and complaints.

- **Human Rights in the Process of Technological Evolution:** Brisa encourages the development and use of Artificial Intelligence (AI) and other innovations in an ethical and responsible manner, without compromising Human Rights. The company ensures that the adoption of new technologies upholds principles of transparency, equity, and non-discrimination, promoting responsible governance. Brisa reinforces that technological progress will always be pursued with full respect for Human Rights and the dignity of every individual, ensuring that all advancements within the company adhere to these principles.

### 3. IMPLEMENTATION

The commitments set out herein are ensured through a structured and effective strategy. Regardless of having as its main focus the prevention of Human Rights' violations, Brisa also assumes an active commitment over protection and remediation, ensuring a comprehensive and continuous approach to the promotion, protection and respect of Human Rights.

#### 3.1. Prevention

The commitments established in this Policy will be implemented by Brisa through actions, training and communication on Human Rights, regularly promoting the training of its Employees and ensuring alignment with internal policies. Brisa integrates responsible management practices into its internal processes and establishes specialised strategic partnerships to strengthen awareness and promote positive changes, both internally and in the respective value chain.

#### 3.2. Protection and Remediation

##### 3.2.1. *Grievance/Feedback Mechanisms and Remedies*

Brisa develops active strategies for the protection and remediation of situations of Human Rights' violations. The Whistleblowing Channel is available to everyone, and Brisa is committed on promoting greater awareness on the use of this platform, emphasizing its confidentiality, as well as zero tolerance for any acts of retaliation, with the aim of creating a culture of trust. The Ethics Ombudsman thoroughly investigates all reports and recommends the implementation of appropriate resolution mechanisms. In addition to the protection of those involved (*inter alia*, complainant, witness, victim), Brisa may evaluate other forms of appropriate reparation, if the situation justifies it.

### 3.2.2. *Communication for Impact*

Brisa considers it essential to communicate, both internally and externally, how it is mitigating any negative impacts on Human Rights. This means not engaging in manipulative practices that seek to create a positive image of environmental and social responsibility and carrying out a transparent assessment of the company's situation and the mechanisms put in place to this end.

### 3.3. Monitoring and Action Plan

Brisa ensures it monitors the effectiveness of its response to negative impacts (actual or potential) on Human Rights. In this sense, a preventive action plan was developed to ensure the implementation of the prevention measures designed, including training actions for all its Employees. This action plan materializes the commitments that Brisa has assumed through the following actions:

- Identify and monitor the potential negative impacts that its operations or those of its suppliers may have on Human Rights;
- Implement a Human Rights' due diligence system, to identify activities and situations that present a greater risk to Human Rights, and develop mechanisms, not only to prevent and mitigate these risks, but also to remedy possible violations that may occur;
- Periodically assess the effectiveness of the due diligence system, with a focus on activities that present the greatest risks of Human Rights' violations;
- Monitor developments in the implementation of the commitments set out in this Policy and ensure that such commitments are met.

## 4. FINAL PROVISIONS

It is the responsibility of BAE's Executive Committee (EC) to approve this Policy, which will be reviewed every three years, to maintain the utmost rigor and excellence with regards to the principles and guidelines adopted.

All situations not provided for in this document or that raise doubts should be forwarded to BAE/DSC, which is responsible for pursuing the most appropriate solution and/or providing clarifications.

Employees have the duty to report to the Ethics Ombudsman, through the Whistleblowing Channel, any violation of this Policy, under the terms provided for in the Irregularity Reporting Regulation and in point 4.1. of Brisa's Code of Ethics and Conduct.

## 5. DEFINITIONS

In this Policy, words with capital letters have the meaning given to them in this chapter, unless the context has a clearly different meaning.

Unless otherwise provided in this Policy, the terms and expressions defined in the singular or plural may be used, respectively, in the plural or in the singular, with the corresponding change in their meaning.

The definitions below do not claim to be exhaustive and are merely indicative, without prejudice to the applicability of relevant mandatory rules.

<b>Harassment</b>	Unwanted behaviour, namely that based on a discriminatory factor, practiced when accessing employment or in the job, work or vocational training itself, with the aim or effect of disturbing or embarrassing the person, affecting his dignity, or creating an intimidating, hostile, degrading, humiliating or destabilising environment.
<b>Brisa</b>	Brisa Auto-Estradas de Portugal, S.A. and all companies that are in a control or group relationship with it.
<b>Employees</b>	All those who have an employment relationship with Brisa or members of the company's statutory bodies.
<b>Human Rights</b>	Human Rights are norms that recognize and protect the dignity of all human beings.
<b>Intimidation</b>	The act of making someone feel fear or discomfort, usually through threats or aggressive behaviour.
<b>Value Chain Worker</b>	"A person who performs work in the value chain of the undertaking, irrespective of the existence or nature of any contractual relationship with the undertaking", in accordance with Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council.