

# Human Rights Policy

GHSA-POL-08

Printed copies are not guaranteed to be up to date

This document is the property of the Hispasat Group and may not be used for purposes other than those for which it has been provided, nor may it be reproduced, in whole or in part, nor transmitted or communicated to any person outside the organisation without Hispasat's authorisation

[hispasat.com](http://hispasat.com)

 **Hispasat** | A part of  
INDRA GROUP

# 1 Introduction

---

Through this Human Rights Policy (hereinafter the “Policy”), the Board of Directors of Hispasat wishes to convey to all its stakeholders a message of firm commitment to sustainable, fair and inclusive development. This Policy was approved by the Board of Directors on 21 July 2026, following a favourable report from the Audit Committee. Any amendments will follow the same procedure.

As a technology group and operator of space services, HispaSat (hereinafter the Group or HispaSat), aware of the impact it has on people, both as an employer and through the development and marketing of its services, undertakes, within its sphere of influence, a commitment to take a leading role in the protection and promotion of human rights and has drawn up this HispaSat Group Human Rights Policy (hereinafter ‘the Policy’) to help identify and promote positive impacts throughout its value chain and minimise the negative impacts on people arising from its activities.

The HispaSat Group’s Human Rights Policy is based on the United Nations Guiding Principles on Business and Human Rights (UNGPs), and on the following international human rights conventions and commitments:

- The United Nations Universal Declaration of Human Rights.
- The United Nations International Covenant on Economic, Social and Cultural Rights.
- The United Nations International Covenant on Civil and Political Rights
- The United Nations Global Compact.
- The Organisation for Economic Co-operation and Development’s Guidelines for Multinational Enterprises.
- Fundamental Conventions of the International Labour Organisation (ILO).
- United Nations Convention on the Rights of the Child.
- United Nations Convention on the Rights of Persons with Disabilities.

This Policy forms part of HispaSat’s commitment to ethical conduct, as already set out in the Code of Ethics and Conduct and in other Corporate Policies that directly or indirectly protect people’s fundamental rights.

## 2 Objective and scope

---

The objectives of the Policy are summarised as follows:

- To define the specific commitments undertaken by HispaSat at a global level regarding the respect for and promotion of human rights that are directly or indirectly affected by the Group’s activities in the communities in which it operates.
- To establish the general principles necessary to ensure that these commitments are integrated into the Group’s business model and the management of its activities.

As regards its scope, this Policy applies to and is binding on all companies within the HispaSat Group on a global scale. This Policy also applies, where appropriate, to joint ventures, temporary consortia and other equivalent partnerships where the company assumes management responsibility.

HispaSat’s international presence means that the Group operates within a wide variety of legal systems, labour environments and socio-cultural contexts. For this reason, this Policy and its implementation will comply with the legal frameworks in force in those countries where the Group operates and will serve as a guide for going beyond legal requirements in countries with less stringent regulatory frameworks.

In those investee companies where this Policy does not apply, HispaSat will promote, through its representatives on their governing bodies, the alignment of their own policies with those of the Group.

All staff members are obliged to be familiar with, understand and comply with the provisions set out in this Policy; this applies in particular to those staff members who, by virtue of their position of responsibility, manage teams or have decision-making, executive or influential powers.

These commitments extend to representatives, suppliers and other third parties who provide services to HispaSat or who, in any way, act on behalf of HispaSat, such as agents, intermediaries or subcontractors, irrespective of the territory in which they carry out their activities (hereinafter “collaborators”).

### 3 Objective and scope

---

HispaSat adopts and promotes the following basic principles, which must govern its conduct in accordance with the United Nations Guiding Principles on Business and Human Rights:

- To establish specific commitments regarding human rights and put them into practice by integrating them into the company’s business model and operations.
- Apply human rights due diligence criteria to identify potential impacts on people’s rights that the company’s operations and activities may cause, either directly or through a third party.
- Develop mechanisms to prevent and mitigate human rights risks, and remedy any negative impacts should they materialise.
- To promote a culture of respect for human rights, by encouraging training and raising awareness amongst staff, suppliers and stakeholders.
- Encourage employees, and in particular suppliers, to share the commitment to ensuring that HispaSat and its technology respect and promote human rights.
- Collaborate proactively with stakeholders to identify the most relevant issues in this area.
- Incorporate relevant human rights risks into the Group’s corporate risk map, control systems and internal audit processes.
- To establish an internal control mechanism for the commitments made in relation to human rights.
- Communicate and publish our commitments and performance in the area of human rights.

### 4 Our commitments

---

HispaSat is committed to respecting and promoting respect for human rights that may be directly or indirectly affected by its activities. To effectively extend this commitment throughout its entire value chain, as recommended by the United Nations Guiding Principles, HispaSat undertakes and promotes specific commitments associated with the areas of action where it can exert the greatest influence.

#### Commitment to staff

HispaSat is committed to offering fair and decent working conditions and remuneration, and to respecting and promoting the rights of all staff in accordance with the ILO Declaration on Fundamental Principles and Rights at Work, regardless of where it carries out its operations.

HispaSat has internal policies and processes in place to promote respect for labour rights, prevent discriminatory practices and foster a respectful and motivating working environment.

These commitments are primarily reflected in:

- Promoting diversity, inclusion and equal opportunities, contributing to the wellbeing of staff and their families by fostering a safe, diverse and inclusive working environment. Equal opportunities, diversity, respect for individuals and non-discrimination (on grounds of race, sex, age, language, religion, disability, sexual orientation, opinion, origin, economic status, birth, trade union membership or any other personal or social condition or circumstance) are established as fundamental principles of the company’s conduct. Particular attention will be paid to ensuring equality between men and women in access to employment, working conditions and pay. HispaSat rejects all forms of harassment, threats or intimidation, whether verbal, physical, sexual or psychological, in the workplace.

- To guarantee freedom of association, the right to organise, the right to strike and the right to collective bargaining. Furthermore, to promote respect for the right to freedom of expression of all the company's staff.
- To put in place appropriate measures to ensure the proper processing of employees' personal data, with the aim of respecting their right to privacy and data protection in accordance with current legislation.
- To provide a safe and healthy workplace at all sites by adopting procedures and regulations relating to health and safety at work.
- To promote local employment by offering first jobs to young people in the communities where it operates and, where applicable, to consider the integration of communities of origin.
- To prohibit and reject any form of forced labour, slavery, child labour or human trafficking within its operations, paying particular attention to the rights of migrant workers.

## **Commitment to customers**

- HispaSat aims for the technology it develops to have a positive impact on people and society. Technological advances, particularly those based on advanced technologies (e.g. artificial intelligence, biometric identification and/or big data2), pose new challenges to human rights in terms of security, equality, privacy and freedom of expression.
- Therefore, in line with the recommendations set out in the United Nations Guiding Principles, HispaSat undertakes to:
- Work towards measuring the impact (direct or indirect) that HispaSat's technology may have on people's rights.
- Develop and provide secure infrastructure and services in order to guarantee the confidentiality, integrity and availability of information, protecting it against potential attacks or unauthorised use.
- Use information and data relating to customers and end-users, where access to such data is available, exclusively for the agreed purpose and safeguard it with due diligence and security, in accordance with applicable legislation, particularly with regard to the protection of personal data.
- To provide ongoing training and raise awareness amongst professionals on matters of privacy, data protection and information security, applying these principles in their professional dealings and ensuring that they are familiar with and implement the necessary measures to protect information wherever it is stored, processed or transmitted.

## **Commitment to society**

HispaSat is committed to promoting human rights in the communities in which it operates. This commitment is reflected in:

- Engaging in a transparent and ethical manner with regulatory bodies and public authorities, in accordance with the principles and policies set out in HispaSat's Code of Ethics and Conduct.
- Participating in public policy debates relating to the responsible and safe use of technology and playing an active role in promoting the ethical and safe use of technology in society.
- Practising responsible taxation that contributes to the prosperity of the communities in which the company operates, in accordance with the applicable tax legislation in each case.
- To drive innovation and the development of products and services within HispaSat's portfolio that help to promote the fundamental rights of individuals and society as a whole.
- To foster open and transparent dialogue that brings together different cultural backgrounds.
- Commitment to suppliers and partners
- HispaSat promotes respect for and the advancement of fundamental rights throughout its operations and is therefore committed to:

- Implement a certification system with the aim of ensuring that suppliers and partners demonstrate strict respect for the human rights recognised in national and international legislation in the course of their activities. In particular, suppliers and their employees must: (i) take the necessary measures to eliminate all forms and types of forced or compulsory labour and any form of modern slavery; (ii) expressly reject the use of child labour within their organisation; (iii) respect their employees' freedom of association; and (iv) set their employees' wages in accordance with applicable laws, respecting minimum wages and working hours.
- Promote the use of approved local suppliers who have therefore undertaken the company's ethical commitments set out in this Policy and in the Supplier Sustainability Policy.
- Not to use, in product development—where the Group carries out such activities—"conflict minerals" whose extraction involves the violation of human rights and/or whose proceeds finance armed conflicts.

## 5 Consultation and Whistleblowing Channel

---

The Ethics and Compliance Channel ([Hispasat](#)) is the mechanism made available to Hispasat's staff and collaborators, as well as other third parties with a legitimate interest, to raise any queries with the Group regarding the interpretation and application of this Human Rights Policy and its implementing regulations, and through which any irregularities or breaches detected in relation to this Policy and related regulations, or any conduct affecting people's rights, must be reported.

All communications received through this channel are handled in accordance with the principles of confidentiality, respect, thoroughness, privacy and security, with full respect for the rights and safeguards throughout the process, both in the analysis and verification of the communications received and in the resolution and, where appropriate, the adoption of corrective measures.

For further information on how the Ethics and Compliance Channel operates, please refer to section 4.5 of the HispaSat Group's Code of Ethics and Conduct.

## 6 Implementation and monitoring

---

The monitoring and oversight of the objectives and principles set out in this policy are the responsibility of HispaSat's Audit Committee, which will report its findings to the Board of Directors.

The Security and Sustainability Department is responsible for managing human rights due diligence, with the involvement of the relevant corporate departments, and for promoting, coordinating, measuring and reporting, at both global and local levels, on the development and implementation of this Policy.

HispaSat is committed to maintaining a transparent framework for managing the Human Rights Policy and to publishing both the framework and its performance in the annual Sustainability Report.

## 7 Relationship with other policies or protocols

---

HispaSat has a set of standards designed not only to comply with applicable regulations but also to incorporate national and international best practices and recommendations on sustainability. Consequently, this Human Rights Policy is complemented by HispaSat's other internal regulations, in particular:

- Code of Ethics and Conduct.
- Sustainability Policy.
- Environmental and Energy Policy.
- Integrated Management Policy.
- Information Security Policy.

- Sustainability Policy for Suppliers.
- Information Security Policy for Suppliers.
- General Data Protection Policy.
- Criminal Compliance System Manual.
- Anti-Corruption Policy.
- Risk Management Policy.
- Corporate Risk Management Manual.
- Human Resources Policies: Equality Plans, Diversity Policy and Protocol on Psychological Harassment and Unacceptable Behaviour, amongst others.
- Tax Policy

# Trusted and Reliable Satellite Solutions

Avda. de Bruselas, 35  
28108 Alcobendas  
Madrid, Spain  
T +34 91 710 25 40

[hispasat.com](http://hispasat.com)

 **HispaSat** | A part of  
INDRA GROUP