

Grupo Altia

Sustainability Policy

P_21 Regulatory Compliance and Risk Assessment

IT_21_12 Sustainability Policy

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1 Introduction

Through this Sustainability & ESG Policy, the Altia Group (hereinafter referred to as “the Group” or “Altia Group”) reaffirms its commitment to sustainable development and ESG criteria (environmental, social, and corporate governance), aiming to define the principles that guide its relationships with all stakeholders.

Altia Group is committed to integrating sustainability practices throughout its business model, ensuring that all its activities are carried out in a manner respectful to people, the environment, and the community at large, aligned with respect for Human Rights and sustainable development.

This policy establishes the basic principles and general framework of action for managing sustainability practices within the Group, serving as a basis for their integration into corporate strategy. The monitoring and oversight of the objectives and principles of this policy are the responsibility of Sustainability & ESG Management, which will report its findings to the Board of Directors. This reporting aligns with the company’s ongoing commitment to ethics and sustainable development, as well as the requirements of its stakeholders.

2 Our Commitment

At Altia Group, we recognize that **technology and sustainability** are two fundamental aspects on the path towards a more prosperous and equitable future. We strive to deliver innovative solutions that not only drive business growth but also minimize our environmental impact and promote sustainable development.

We are aware of the global challenges, and therefore, we are committed to the United Nations' 2030 Agenda and its Sustainable Development Goals (SDGs). We work to align our strategy with the SDGs where we can have the greatest impact, to create a more equitable, resilient, and sustainable future for people and the planet.

The United Nations recognizes, for the first time in the 2030 Agenda, the key role that the business community must play in implementing a global action plan, seeing companies not only as wealth generators but also as drivers of development. The 2030 Agenda states that private business activity, investment, and innovation are major engines of productivity, inclusive economic growth, and job creation. It encourages all companies to harness their creativity and innovation to address issues related to sustainable development.

We share the vision that sustainable development generates new business opportunities, fosters innovation, and enhances reputation; in addition, the SDGs enable companies to strengthen relationships with their stakeholders, boost employee motivation and talent retention, and build credibility with clients, investors, and suppliers, ultimately driving greater operational efficiency within the organization ¹.

¹ The Business Sector and the 2030 Agenda. Spanish Network of the Global Compact.

3 Scope of Application

This Policy constitutes a reference framework for sustainability matters. It is applicable and mandatory for all Altia Group companies worldwide, without prejudice to the strict compliance with applicable regulations in each of the countries where Altia Group operates.

All governing bodies and the various units within the Group are obliged to be aware of, understand, and comply with the guidelines contained in this Policy, ensuring it is shared with and accessible to all Altia Group personnel.

This policy may be extended to suppliers and business partners, whenever possible and depending on the nature of their relationship.

4 Related Policies

The Sustainability & ESG Policy complements and supports the various internal regulations of the Altia Group, in particular:

- Code of Ethics
- Stakeholder Management Policy
- Internal Code of Conduct
- Board of Directors Regulations
- Equality Plans and Policies
- Protocols and Measures for the Detection and Handling of Gender-Based Violence
- Protocols and Policies for the Prevention of Workplace Harassment, Sexual Harassment, and Harassment Based on Sex, Sexual Orientation, Gender Identity or Gender Expression

5 General Principles

Our sustainability model is based on values of integrity, responsibility, and commitment to the well-being of people and the planet. Through ethical and transparent management, we aim to create long-term value for all our stakeholders and contribute positively to the sustainable development of society.

In this regard, our ESG approach reflects the company's ongoing commitment to environmental sustainability, care for people's well-being, and the importance of solid corporate governance in our operations and decision-making.

We adopt a cross-cutting view of sustainability throughout our activities, supported by the following principles:

- **Holistic approach.** Our sustainability model is based on a holistic approach that considers the environmental, social, and economic aspects of our operations and activities. We recognize the interconnection between these three areas and work to balance them harmoniously.
- **Commitment to ESG principles.** We adopt and promote ESG principles as a guiding framework for our business conduct. We are committed to full compliance with applicable regulations and to demonstrating our commitment to social responsibility and sustainability in all our actions and decisions.
- **Transparency and accountability.** We are committed to operating transparently and responsibly, communicating our sustainability impacts and actions clearly and rigorously. We take responsibility for our actions and strive to generate a positive impact on our communities and the environment.
- **Long-term focus.** We adopt a long-term vision in all our initiatives and decisions. We are guided by a clear purpose of “growing by helping others grow” in a sustainable and enduring way, ensuring our future growth through responsible and prudent management.
- **Innovation and adaptability.** We promote innovation and adaptability as drivers of our business model. We constantly seek new solutions and approaches to address emerging challenges and respond effectively to changing demands in our environment.
- **Collaboration and strategic partnerships.** We recognize the importance of partnerships and collaboration to expand our impact and maximize our collective influence. We build strong relationships with other organizations from the private sector, public sector, and civil society to work together on projects and programs that advance our sustainability strategy.
- **Promotion of equality and inclusion.** We are committed to promoting equal opportunities, diversity, and inclusion in all our activities and operations. We actively work to eliminate any form of discrimination and ensure a fair and respectful working environment for everyone who is part of the Altia Group team.

6 Our Sustainability Strategy

At the core of our sustainability strategy, integrated into our business model, lie **four fundamental pillars** that guide our actions and define our commitment to creating a positive impact on society and the environment.

These pillars are the foundation that provides us with a solid structure on which to build a more sustainable future.



Technology and innovation

We believe **that innovation is an essential tool** for building more prosperous and sustainable societies, which is why we continually seek new ways to address the challenges faced by our clients, helping them grow and adapt. **Our technology acts as a transformative agent, connecting people and fostering the development of solutions** that drive our clients' progress, always with a responsible and ethical approach.

This innovative vision is combined with **services based on our extensive experience and deep understanding of the sectors** in which we operate. This enables us to deliver **highly specialized services tailored** to our clients' specific needs, thus contributing to their growth and success in an increasingly dynamic environment.



People, Our Greatest Asset

We implement **internal policies that ensure equal and fair treatment for all members of our team**. We are committed to **fostering inclusion and diversity within our teams**, recognizing that diversity of thought and experience enriches our company and makes us stronger as a team. We believe in creating a **more equitable technology industry** where human rights are respected and promoted at all stages of the business process.

We strive to create **an inclusive, diverse, and respectful work environment** where every person feels valued, supported, and motivated to achieve personal and professional success.



Dynamic and collaborative spirit

Our commitment to corporate social responsibility is reflected in our dynamic and collaborative spirit, where **corporate volunteering acts as a catalyst for the company's social commitment**, through which our employees serve as agents of change in their communities.

We believe in the importance of **contributing to the well-being of our communities** and leveraging our position as a company to **create a positive and lasting impact on society**.

We are committed to continuing to **drive actions and programs that promote corporate social responsibility** and help build a fairer and more equitable world for all people.



Integrity and Transparency

We are guided by **trust and leadership to establish solid management structures** that operate with transparency, rigor, ethics, and integrity in all our operations and decisions.

We firmly believe in **equity, dignity, and respect as essential pillars** in all our interactions, both inside and outside the organization.

We are committed to maintaining **high standards of ethical conduct in all our activities**, ensuring that **our actions align with our values and principles**.

7 Relationship with Stakeholders

To fulfil the general principles of our Sustainability & ESG Policy, we establish the following commitments with our stakeholders:

7.1 Employees

Altia Group works to attract and retain the best talent by committing to:

- Create stable and quality employment with a strong commitment to respecting and defending human rights.
- Ensure the right to effective equality of opportunity and treatment for all employees.
- Pay special attention to work-life balance, as well as the safety, health, and well-being of the entire workforce.

Respect diversity, prohibiting workplace discrimination based on sex, sexual orientation, gender identity or expression, age, ethnic origin, religion, or any other circumstance.

- Maintain work environments free from harassment and violent or offensive behaviors against the rights and dignity of individuals, ensuring that appropriate procedures exist to address and correct any such incidents.
- Promote and support corporate volunteering and commitment to Altia Group's social initiatives to contribute to the progress of the communities where we operate.

7.2 Clients

Altia Group works to build lasting relationships with its clients through quality work and trust, committing to:

- Offer innovative and high-quality solutions to support clients towards a more digital and sustainable future.
- Ensure regulatory compliance, especially regarding the security of their data and confidential information, as well as rigorously complying with Altia Group's Code of Ethics.

- Maintain appropriate and efficient communication channels, using the most suitable means.
- Carry out responsible project management.

7.3 Shareholders and Investors

We maintain high standards of commitment and transparency in all our operations, with a zero-tolerance policy towards corruption and a firm commitment to the transparent disclosure of economic and financial information.

In compliance with the provisions related to market abuse established in securities market legislation and BME Growth, the parent company of Altia Group regulates, through its Internal Code of Conduct and the internal Technical Instructions that implement it, the obligations that individuals subject to this Code must comply with regarding insider information, ensuring transparency and investor protection.

7.4 Partners, Employees, and Suppliers

We establish relationships based on trust and mutual respect, ensuring confidentiality and professional secrecy in all our interactions, as well as promoting ethical principles within our supply chain and collaborations.

7.5 Authorities or Institutional Organizations

- Ensure the strictest legal compliance in all activities of Altia Group.
- Maintain a policy of transparency in relations with governments and public institutions.
- Act ethically, transparently, and with social commitment.

7.6 Society

At Altia Group, we are committed to making a positive contribution to community well-being and environmental care, and therefore commit to:

- Complying with environmental and social regulations, as well as actively participating in the fight against money laundering and other illicit activities.
- Taking responsibility for the impact, our activities may generate by assessing environmental risks.
- Being allies or promoting social action initiatives that foster the development of a society with greater awareness of the potential of the technology sector as a tool for the future and sustainable progress.

7.7 Communication Channels with Stakeholders

Altia Group has established an Internal Information System (IIS) consisting of a set of Ethical Channels for all the companies that comprise it, which are available to the various identified stakeholder groups.

INTERNAL CHANNELS	EXTERNAL CHANNELS
Corporate intranet Employee communications Internal newsletters Meetings and talks Training activities	Group websites Sustainability report Corporate reports and documents Social and professional networks Press releases Customer satisfaction surveys Phone numbers and contact mailboxes Meetings and conferences

8 Sustainability Oversight in Group

The implementation and execution of the Sustainability & ESG Policy is a cross-cutting commitment throughout the Group, with all departments responsible for gradually integrating it into their strategic and operational agendas.

Altia has established a corporate Sustainability & ESG Directorate that acts as an internal body responsible for advising, informing, and executing sustainability-related initiatives.

The Board of Directors holds the authority to endorse and approve the Sustainability & ESG Policy, supported by the Sustainability & ESG Directorate in its review, updating, and oversight.

8.1 Functions of Sustainability & ESG Management

The Sustainability & ESG Directorate will be responsible for communicating the Group's sustainability principles and objectives and advising the various departments to integrate them into the Group's activities, as well as generally into applicable internal regulations.

Among its duties, the Sustainability & ESG Directorate monitors sustainability initiatives and evaluates and proposes to the relevant body the adoption of new initiatives that are relevant to Altia Group within this scope.

Additionally, the Sustainability & ESG Directorate is tasked with overseeing the implementation of this Policy within its areas of responsibility.

8.2 Update of the Sustainability & ESG Policy

The Policy will be subject to review as it is necessary to align it with legal changes and/or to incorporate the best practices deemed necessary to achieve its objectives.

8.3 Communication and Dissemination of the Sustainability & ESG Policy

The communication of sustainability practices will be carried out annually in the Sustainability Report and the non-financial information report, allowing stakeholders to evaluate Altia Group's performance in this area during the relevant fiscal year.

The Sustainability & ESG Policy is available on the corporate website <https://www.altia.es/es/sobre-altia/sostenibilidad>



altia.es

