SUSTAINABILITY

Corporate policy

astara

CHANGE CONTROL

Edition	Version 1.0
Approval date	
Changing sections	
Change description	
Clasification	

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1. PURPOSE

This Policy defines the general guiding principles and commitments of astara regarding sustainability, oriented towards creating long-term value, the development of environmental and social business opportunities and managing social and environmental risks, such as climate change, resource scarcity and the breaches of social rights.

Under this premise, astara has voluntarily taken on certain ethical, social and environmental commitments that go beyond its legal obligations toward its stakeholders.

Integrate sustainability in all the astara's businesses and organizational levels, ensuring availability of needed resources, considering the stakeholders´ expectations on sustainability issues.

2. DEFINITIONS

I. **Affiliate**: means any entity that directly or indirectly through one or more intermediaries, controls or is controlled by the entity specified. For purposes of this definition, control of an entity means the power, direct or indirect, to direct or cause the direction of the management and policies of such entity whether by contract or otherwise, and ownership of the majority of the voting rights of another entity shall create a rebuttable presumption that such entity controls such other entity.

II. **Astara**, **Group**, **or astara Group**: includes Astara Mobility S.A., and all its Affiliates, and branches.

III. **Astara's Personnel**: meaning all directors and officers, employees, consultants working within Astara and workers working at any Astara business anywhere in the world.

3. SCOPE OF APLICATION

This Policy applies to Astara Group and Astara's Personnel.

This Policy focuses on the sustainability requirements for Astara and represents the minimum standards required that all Group's entities must meet, regardless of their geographical location, to ensure compliance with the applicable regulations in each location.

In the event that local regulations establish more restrictive requirements, the affected entity must observe those regulations and inform the Corporate Compliance Committee.

Astara's Corporate Compliance Committee is responsible for the development and the interpretation of this document.

4. PROCEDURE

4.1. Sustainability General Principles and Commitments

Under this policy, Astara sets out a number of principles and commitments, designed to create long-term value for its stakeholders, as follows:

Environment

Astara is committed to protecting the environment, especially in relation to developing solutions to address the challenges posed by climate change. To this end, Astara recognize the need to consider the environmental impact of its facilities and internal operations and of its activity.

With regard to the environment, Astara undertakes the following principles:

- o Conduct comprehensive assessment of the environmental impact resulting from its facilities, internal operations, and activities. These assessments will guide our decision-making process and help identify opportunities to minimize our ecological footprint.

- o Promote continuous improvement of its management systems in order to improve environmental performance.

- o Establish work guidelines and control mechanisms to ensure environmental protection and pollution prevention. Astara will establish fact-based and measurable targets to reduce the carbon footprint and work towards achieving them within defined timelines with clear improvement year over year.

- o Communicate the policy to Astara's Personnel and society and establish with its stakeholders' communication channels related to environmental topics.

- o Astara will comply with all applicable environmental laws, regulations, and standards, and strive to exceed these requirements wherever possible.
- o Promote actions to mitigate climate change and progressively reduce the Group's carbon footprint.

- o Advance in the decarbonization journey and act responsibly on waste and water. With the intention of eliminating single use plastics and other non-recyclable materials across Astara´s operations, encouraging the use of environmentally friendly alternatives.

- o Astara will explore and invest in renewable and clean energy sources to power our operations, transitioning away from fossil fuels whenever feasible).

- o Integrate the environmental variable into the Group's risk management:

    - Astara will conduct regular internal audits and assessments to identify areas for improvement and implement corrective actions accordingly.
    - Astara will transparently communicate our environmental performance and initiatives to stakeholders through regular reporting and engagement platforms.

- o Promote between Astara's Personnel and suppliers a culture of environmental protection.

- o Engage with organizations, governments, and communities to foster cooperation, share knowledge, and collectively address environmental challenges.

- o Make rational use of resources, developing initiatives in the field of circular economy applied to business.

Astara's Personnel

Astara's continued success depends on our Astara's Personnel. Therefore, Astara works to attract, retain and develop our talent to have the best professionals, always making sure they provide customers with the best service. The Ethics Code will, in turn, catalogues the ethical principles and rules of conduct by which all activities of Astara's Personnel must be governed.

With regard to the Astara's Personnel and stakeholders, the Group will observe the following principles:

- o Comply with and enforce current legislation on working conditions, with special attention to the principles of the United Nations Universal Declaration of Human Rights.

- o Ensure respect for state, local and regional regulations that are applicable in the field of health and labor flexibility.

- o Prevent and avoid situations arising from psychosocial risks, especially workplace harassment, counting on protocols and action measures to ensure the functioning of reporting channels and corrective actions that may arise from them.

- o Promote diversity and equal opportunities in the selection and retention of talent, aspiring to have a balanced representation between men and women in all functions and responsibilities.

- o To promote people's professional development in a progressive, motivating and inclusive environment.

- o Maintain a safe and healthy working space through risk management, preventive and corrective measures and the promotion and protection of safety and health among astara's Personnel; involving all persons affected by the Group's activities (e.g. suppliers).

- o Respect for diversity, and non-discrimination because of gender, race, age or any other condition.

- o Promotion of work-life balance, as well as a safe and healthy workplace for Astara's Personnel.

- o Make sure Astara's Personnel behave in accordance with certain ethical and responsible conduct principles and rules by implementing the Ethics Code .

- o Promote programmes to make Astara's Personnel aware of social and environmental issues, included measures for good environmental management practices, social and environmental risks and business opportunities.

- o Encourage corporate volunteering to help the communities it serves prosper and increase Astara's Personnel pride in belonging to Astara.

- o Become best employer and scale the social footprint on our communities.

Customers

Build long-term relationships of trust being established with customers, earning their loyalty, adapting to their needs and enhancing their satisfaction.

With regard to customers, the Group will observe the following principles:

- o   Astara aims to offer products and services that are personalized and adapted to the needs and risk profile of its customers and provide them with accurate, sufficient and appropriate information.

- o   It will give customers access to the various products and services through a multi-channel offering so customers may use them however, whenever, and wherever they wish based on their needs.

- o   It will monitor exceptional situations or settings that may have an effect on certain customers in order to offer them alternative solutions, in particular, among those groups in a situation of vulnerability or risk of social exclusion.

- o   It will make decisions taking into account ethical, social and environmental matters and risk criteria pursuant to this Sustainability Policy.

Tax

Astara´s tax policy is based on a commitment to ethical principles, good corporate governance, transparency, sustainability and social responsibility.

Communities

Create social value in the short and long term, maximizing positive impacts and minimizing eventual negative impacts on society and the environment, promoting the search for sustainable business, establishing alliances and collaborations with all stakeholders.

Astara also helps the communities it serves to prosper socially and economically through its investment. The Group understands the support to communities as an empowering lever that contributes to alleviating problems faced by individuals in a vulnerable situation, or with disabilities caused by a mobility-related accident.

With regard to communities, the Group will observe the following principles:

- o   Promote initiatives to raise awareness about these issues and the fight against climate change.

- o   Consider within its social investment decisions to contribute towards inclusion programs for individuals with disabilities, such as providing training in order to begin a professional career, and adapting cars for their needs and make them affordable and accessible.

- o   Improve vulnerable population´s job access by offering companies a B2B solution at better conditions.

o Promote Astara's Personnel participation in this area through volunteer initiatives.

Suppliers

Astara has ethical and transparent relationships with suppliers, which states that sustainability principles will be considered when selecting suppliers, specifically mentioning:

o Ethics and conduct: as referring to compliance with principles of fair and honest treatment, transparency and honesty. It is also expected that suppliers have ethical policies and at least comply with local laws, anti-corruption measures and initiatives to ensure business integrity.

o Social aspects: such as the protection of human rights in accordance with the UN Universal Declaration of Human Rights, and in terms of health, safety requirements and diversity and inclusion in the working environment of suppliers, encouraging the observance of the UN Global Compact principles.

o Environmental aspects: inviting suppliers to join the Group commitment on environmental protection and transition to a low carbon economy.

4.2. Communication and Dialogue

Committed to being transparent with Astara's stakeholders about Astara's sustainability initiatives, successes, and goals.

Understand, analyze and manage the expectations of the Astara's various stakeholders, such as shareholders, employees, customers, partners, suppliers and contractors, public agencies and institutions, the media, local communities and the society in general.

Astara has several communication channels that are available and accessible, which it uses to inform, involve, and maintain continuous dialogue with its stakeholders, aimed at:

▪ Know the expectations of the parties that affect or that may be significantly affected by the Group's activities and services.

▪ Establish relationships of trust on the basis of dialogue, collaboration and mutual benefit by establishing adequate and efficient communication channels.

▪ Assess the considerations of stakeholders in decision-making.

4.3.   **Roles and Responsibilities**

The Board of Directors of Astara Mobility, S.L., is ultimately responsible for the Sustainability Policy, the Group's strategy in this area and the relationship with stakeholders.

In this work, the Board of Directors is supported by the Global Head of Environment, the Global Chief People Officer and the Global Head of GRC whose functions are as follows accordingly:

- Evaluate and periodically review the Sustainability Policy, in order to fulfill their mission of promoting the social interest and take into account, as appropriate, the legitimate interests of other stakeholders.

- Promote actions and projects in the field of sustainability.

- Collaborate with corporate areas and Affiliates, through working groups, in the sustainability commitments and responsible management of the Group.

- Monitors changes or updates to industry trends, policies, and regulations and provides specialized expertise to the Affiliates as needed.

5.   BREACH OF THE POLICY

Failure to comply with these regulations may result in labor sanctions, without prejudice to administrative or criminal sanctions, which may also result from it, in accordance with applicable labor legislation.

The sanctions that may be imposed shall take into account the seriousness of the offence committed as well as other concurrent circumstances.

In the event that it is determined that the action or omission could also constitute a crime, such circumstance will be revealed to the competent authorities for the knowledge and prosecution of the crime.

In no case may the commission of a crime be justified by obtaining a benefit for the Group.

6. ACCEPTANCE AND COMPLIANCE

This Policy is communicated to all Astara's Personnel, who are obliged to comply with it from the moment they join Astara, and during their professional relationship with Astara. All Astara's Personnel must record their acceptance of this Policy.

7. VALIDITY

This Policy has been approved by Astara Mobility, S.A. Board of Directors, being incorporated into the internal regulations of ASTARA and remaining in force until its cancellation or modification is approved. Any modification of this Policy must have the approval of the Astara Mobility, S.A., Board of Directors.

8. REFERENCES

- o Ethics Code

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