STATEMENT MODERN SLAVERY ITURRI

2024

ITURRI
Your safety matters

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1. ITURRI in figures



14	+1.400	+10.000	+ 2.000.000
países	empleados	clientes	personas protegidas

At ITURRI we work to protect people and their environment with innovative, efficient and sustainable solutions to contribute to a safer and more secure world.

We are committed to the manufacture and distribution of technical workwear, military footwear and firefighting vehicles with a high technical and innovative component.

Our ability to provide tailor-made solutions is our main differentiating feature. Our personal proximity to our clients, our in-depth understanding of their problems and our global knowledge make ITURRI a multi-product, multi-country and multi-sector company.

2. Our Policies and Effectiveness

Reaffirming our commitment to corporate social responsibility practices, at ITURRI we hold SA8000 accreditation, which is based on recognised international principles related to labour rights, derived from sources such as the International Labour Organisation, the Universal Declaration of Human Rights and the Convention on the Rights of the Child.

With this accreditation we cover nine essential areas of focus to transform the world around us:

1. Child labour
2. Forced and compulsory labour
3. Health and safety
4. Freedom of association and the right to collective bargaining
5. Discrimination
6. Disciplinary measures
7. Working hours
8. Remuneration
9. Management System

If in previous years, due to the pandemic, we gave high priority to all matters relating to Health and Safety at Work, in order to ensure the integrity of the health of people, the business and society, in 2023, we have given priority to ensuring compliance with human rights and environmental and social policies throughout the value and supply chain. The return to on-site

audits has allowed us to strengthen this control and establish partnerships for improvement, in which we have acted as a driving force.

The SA8000 certifier, SAI, through its auditing company SGS, has carried out external audits of our centres, both in Spain and in Tangiers. At ITURRI we have given extreme importance to these audits on Social Responsibility carried out by a third party.

The results have been very positive and have allowed us to continue to improve communication and the equal application of Social Responsibility policies in all our Centres, while respecting the culture of the country.

In our aim to contribute to a more equal and just world where all human rights are respected, we implemented the SA8000 standard with a particular focus on the eradication of child labour:

Prohibition of Child Labour:

We take a firm stance against the employment of children and minors, extending this prohibition to our partner companies and carrying out audits to ensure compliance, especially in areas such as garment manufacturing and among their subcontractors.

Our procedure for the Detection of Child Labour:

1. Detection of the employment of children and minors triggers immediate action on our part to cease their employment by notifying the Labour Relations Department with specific details of the minor and their work location. Continued employment of the minor is prohibited during any phase of investigation.
2. The Labour Relations Department, in collaboration with other departments and employees, is responsible for verifying the age of the employee through interviews, official documentation, and other methods necessary to confirm the information.

Actions according to the age of the worker:

- **For children**: Work stops immediately. Our organisation would analyse the causes and take corrective measures, including support for the child's schooling.
- **For minors**: Appropriate work would be assessed and assigned, in consultation with the person responsible for the department concerned.

Monitoring and reporting of non-compliance:

All employees of our company should be alert to violations of child or forced labour standards during their visits to suppliers or partners, and report any irregularities through the channels we have established for such purposes, both internally and externally.

On the other hand, in order to find out the needs, opinions and suggestions of our company's employees, we have continued to use our mailboxes. The communication channel "ITURRI listens to you" has been increasingly strengthened by publishing the complaints collected and the responses to these complaints on our website, as part of a policy of transparency and collaboration.

This structure demonstrates our commitment to fighting modern slavery by ensuring an ethical working environment that conforms to international standards.

During 2023, we have collaborated with dual vocational training schools, allowing some workers to carry out internships at our facilities. These internships are carried out with all the controls required by law with respect to the timetables and activities that these minors can carry out in the exercise of their training in factories.

Forced labour

We have implemented strict measures against forced or involuntary labour, as detailed in our Protocol. The Sustainability Department plays a crucial role in verifying that:

- Employees' personal documents, such as passports, are not withheld to ensure their freedom of movement.
- Workers are not required to make financial deposits as a condition of their employment.
- Workers' families are allowed to visit them without restrictions, promoting an atmosphere of openness.
- Staff are not obliged to work overtime, unless it is voluntary and agreed in advance.

Respect for Human Rights in the supply chain

As part of our **Supplier Approval Procedure** we ask the supplier company for their quality (ISO 9001), Environmental (14001), Health and Safety (OSHSA 18001 or ISO 45001) and Social Responsibility (SA8000) certifications, as well as their Data Protection policies AND/OR corresponding Certificate (ISO 27001).

In the event that the supplier company does not have SA8000 certification, we send a questionnaire to be completed by the company with questions relating to respect for human rights. For example, in relation to commitments not to hire underage workers, the guarantee of the right of association and collective bargaining or the existence of non-discrimination measures. In addition, the supplier or subcontractor company provides and signs a document of commitment to the principles set out in the SA8000 standard.

In this way, we ensure that the suppliers and subcontractors we work with meet minimum requirements in terms of non-employment of child labour, rejection of forced or compulsory labour, health and safety, respect for the right to freedom of association and collective bargaining, among other aspects.

We care about ensuring maximum welfare throughout our value chain!

We encourage all our staff to report any violations of these standards to the Procurement and Sustainability Department, reinforcing our commitment to ethical and respectful labour practices.

On the other hand, in relation to external communication, at ITURRI we provide anyone outside the company with a channel for queries or complaints via our website and QRs available at the different offices. This channel will be taken up by the new Compliance Committee.
In this way, we maintain different fluid and organised communication channels to respond to the different queries or incidents that may arise within our organisation.

Clear, transparent and concise communication is our starting point for a favourable environment for all our stakeholders.

3. Due diligence

At ITURRI, our mission is to have a positive impact on society, guided by ethical values that improve the quality of life and safety, always complying with the legislation and procedures in each country where we operate.

The ITURRI Group is committed to carrying out its business and activities in accordance with the highest legal and ethical standards. All ITURRI's commitments in this field are set out in the Code of Ethics. As evidence of this, ITURRI is certified under the standards:

- ISO 37001. Anti-bribery SG
- UNE 19601. Criminal Compliance

4. We assess the risks

We adhere to SA8000 standards, focusing on rigorous risk assessment to ensure respect for human rights. We conduct the assessment by considering both the severity and importance of each human rights, human trafficking and slavery risk using a rating scale of 0 to 10 to determine its impact.

Our risk assessment strategy takes into account the diversity of its operations and the geographical spread of the supply chain, with a particular focus on the most critical situations. As a result, separate and detailed risk maps are being developed for each supplier by commodity group.

We take a personalised, comprehensive and concrete approach to ensure the best quality risk assessment.

This approach allows us to concentrate efforts and resources on the areas that require the most attention in terms of Social Responsibility, prioritising those activities and locations with high

levels of risk, rather than relying on an average or on locations where Social Responsibility practices are most advanced.

5. Staff training

At ITURRI we defend the importance of training and constant learning in order to provide the best of ourselves.

Continuous training in Corporate Social Responsibility continues to be part of the preparation our team receives when they join the company.

As part of the training for new incorporations, we maintain the practice of carrying out a course in which we provide information on the objectives of the SA8000 standard as well as the specific requirements of the nine areas of application to which we at ITURRI are responding. In addition, we include broader concepts on Corporate Social Responsibility, international frameworks and the main reference documents such as Modern Slavery.

May 2024
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