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Code: GE-23	Revision Number: 2
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Human Rights Policy



1. Objective and Scope

This policy establishes the principles and commitment of Infraestructura Energética Nova, S.A.B. de C.V. and its Subsidiaries to respect Human Rights in all its activities and business relationships with employees, suppliers, contractors, and communities.

This Policy applies to all employees (regardless of whether they have an indefinite or temporary contract and/or are subcontracted) of Infraestructura Energética Nova, S.A.B. de C.V. and all its Subsidiaries and Related Parties in Mexico, herein referred to as “IEnova” or the “Company”. It also applies to contractors, suppliers, strategic partners, and operators of assets belonging to IEnova or its subsidiaries.

The resolutions and sanctions derived from any violation of the policy will conform to the provisions of the GE-17-A02 Framework of Sanctions for Non-compliance with IEnova’s Policies.



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3. Policies

3.1 Human Rights Principles

IEnova will carry out its activities in line with the Guiding Principles on Business and Human Rights and the Ten Principles of the Global Compact, also recognizing the rights established in the Universal Declaration of Human Rights.

To foster respect for Human Rights, the following principles have been established:

- Child labor, forced or compulsory labor, human trafficking, and any other type of cruel, inhuman or degrading treatment shall be prohibited in all our operations.
- We will not tolerate intimidation, bullying, nor harassment, whether it be sexual or of any other kind.
- We will respect and promote diversity and inclusion. We will not tolerate discrimination of any kind, be it for: age, ethnic background, national origin, skin color, culture, indigenous identity, language, native language, manner of speaking, religion, marital status, family situation, familial responsibilities, pregnancy, disability, social status, financial situation, health status, legal status, criminal record, sex, gender, sexual orientation or preferences, gender identity, gender expression, physical appearance, opinions, way of thinking, or political affiliation.
- We will promote equal opportunities and treatment in our hiring and retention strategies.
- We will promote equal pay, in order for men and women who perform tasks of equal value to receive equal pay, in compliance with the unalterable commitment to maintain gender equity and respect for the human rights of all our employees.
- We will respect freedom of opinion and expression.
- We will protect the health and safety of all IEnova's employees, establishing mitigation guidelines and mechanisms across our operations.
- We will respect freedom of association and collective bargaining.
- We will respect the rights of ethnic minorities and indigenous peoples.
- We will support and promote the well-being of our employees and of the communities where we are present.

3.2 Company Operations

We will anticipate, mitigate, and remedy, when necessary, any impact related to Human Rights that may occur across the Company's operations:

- We will protect the health and safety of all IEnova's employees and contractors, establishing guidelines and strict occupational health and safety standards across our operations.
- We will analyze the main Human Rights issues that may surround our operations.
- We will offer, or cooperate with others to offer, adequate remediation mechanisms, whenever necessary, including Human Rights grievance mechanisms.
- We will make an effort to avoid and prevent complicity in any human rights violations brought about by any other company, government, individual or group.
- Workers who participate in collective bargaining and their representatives will be respected and protected.
- We will avoid all kinds of discrimination against worker representatives and guarantee that the rights of unions can be effectively exercised in all our operations.

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- We will promote respect for the principles established in this policy in our employees' relationships with each other and in their relationships with suppliers, contractors, and strategic partners.

3.3 Relationships with Suppliers and Strategic Partners

Our relationships with suppliers and strategic partners shall be guided by Human Rights principles, and we will expect from them the same respect and enforcement.

- We will establish work and business relationships that are ethical and upright, in line with what is established in our principles and within a framework of respect for Human Rights.
- All suppliers, contractors, and strategic partners will be exhorted to comply with the principles of this policy and to respect internationally recognized Human Rights.

3.4 Communities

We will mitigate potential adverse Human Rights impacts on the communities where we operate.

- The respect for Human Rights will be exercised in the communities that are impacted by the Company's operations, ensuring ethical and harmonious operations.
- Any Human Rights violations that could arise as a result of IEnova's relationship with the communities will be avoided.
- Communities impacted by our operations will be assessed in order to identify possible Human Rights violations and risks, and to promote and implement mitigation and remediation practices to address Human Rights violations.

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4. Definitions and Terminology

Term	Definition
Age	Refers to the amount of time a person has lived, starting from the date of their birth, and his or her belonging to a specific stage of the human life cycle. It is ascertained by means of a birth certificate or any other official document to that effect.
Child Labor	Any kind of work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that: <ul style="list-style-type: none"> • is mentally, physically, socially, or morally dangerous and harmful to children; and/or • interferes with their schooling by: <ul style="list-style-type: none"> ○ depriving them of the opportunity to attend school; ○ obliging them to leave school prematurely; or ○ requiring them to combine school attendance with excessively long and heavy work. (ILO)
Criminal Record	Refers to information and records of final judgments and convictions about a person who is over 18 years of age and has committed a crime.
Culture	Refers to the set of values, customs, and beliefs of a person or group.
Disability	Encompasses any type of impairment, activity limitation, and participation restrictions of an individual to interact and function in the society in which he or she lives. This could be an impairment related to a bodily structure or function or a limitation in the execution of work or tasks. Such impairments, limitations, or restrictions can be temporary or permanent.
Ethnic Background	Refers to the origin of a person in relation to the community or group of people with whom he or she shares socio-cultural traits such as language, beliefs, culture, religion, values, customs and habits, as well as racial affinities.
Familial Responsibilities	Refers to the set of responsibilities, or lack thereof, of a person in the context of his or her family or depending on his or her family.
Family situation	Refers to the temporary or permanent situation of a person in the context of his or her family.
Financial Situation	Refers to a person's situation or position regarding his or her income, education, and occupation. It also refers to the number of assets that make up his or her wealth.
Forced or Compulsory Labor	All work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily (ILO).
Gender	Refers to the characteristics, traits, qualities, functions, and behaviors that are socially assigned to people according to their biological sex at birth.
Gender Expression	The manifestation of a person's gender. It may include how a person speaks, dresses, or behaves; his or her mannerisms, social exchanges and interactions; and any modifications to his or her body, among other aspects. Constitutes the expressions of the gender that each person lives as, whether imposed, accepted or assumed.
Gender Identity	Internal and individual gender experience as is felt by each individual, which may or may not correspond to the sex assigned at birth.

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Guiding Principles on Business and Human Rights	A set of principles approved by the UN Human Rights Council, which establishes the global standard of conduct for companies and States regarding the relationship between Human Rights and business, in order to protect, respect and remedy them.
Harassment	<p>Harassment at the workplace is a form of violence that presents itself in a series of events whose objective is to intimidate, exclude, overshadow, diminish, threaten, or emotionally or intellectually drain the victim, causing physical, psychological, financial, and occupational and professional harm (Mexican Ministry of Labor and Social Welfare, <i>Secretaría del Trabajo y Previsión Social</i>).</p> <p>Repeated and over time offensive behavior through vindictive, cruel, or malicious attempts to humiliate or undermine an individual or groups of workers (ILO).</p> <p>Sexual harassment is the exertion of power in a relationship of real subordination of the victim to the aggressor in work and/or school environments. It is expressed through verbal or physical behaviors, or both, related to sexuality with a lewd connotation. Sexual harassment is a form of violence in which, even though there is no subordination, there is an abuse of power that leads to a state of defenselessness and risk for the victim, regardless of whether it takes place in one or several events (Government of Mexico).</p>
Health Status	Refers to a person's physical or mental state. It can be assessed either in a subjective manner—with a person stating their own wellbeing or illness—or in an objective manner, by determining the absence or presence of illnesses or harmful factors in an individual.
Human Rights	Freedoms and rights inherent to all people, regardless of race, color, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status.
Human Trafficking	The recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs. (UN)
Indigenous Identity	Refers to the self-assignment and belonging of a person to an indigenous community, encompassed in a specific historical, political and cultural context.
Language	A linguistic system of articulated sounds, ideas, words, and gestures through which people interact.
Legal Status	Refers to the situation of an individual in terms of the recognition of his or her rights and obligations before the law, as per certain applicable conditions and norms.
Marital Status	Refers to the situation of individuals as determined by their familial relationships, according to their circumstances and the applicable legislation.
Migratory Status	Legal and social standing of migrant or foreign individuals through which authorities regulate their stay and exit of the territory in which they live, whether temporarily or permanently.
Manner of Speaking	The specific expressive characteristics of a person's spoken communication.

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National Origin	Refers to a person's country of birth or part of the world to which he or she belongs.
Native Language	The language belonging to a particular people, nation or country. It usually has a socio-political connotation.
Opinions	Refers to the concepts or criteria that a person or group has with respect to someone or something, regardless of whether it is expressed verbally or not.
Physical Appearance	Refers to the way in which a person is seen and perceived by other individuals.
Policy Owner	Individual who is responsible for creating, reviewing, and ensuring that the content of a given policy is updated, relevant, and in compliance with all applicable laws and regulations.
Political Affiliation	Refers to the relationship that a person establishes, whether formally or informally, with a group having certain political interests and ideologies.
Political Identity	Refers to a form of social identity that is constituted on the basis of a political point of view.
Pregnancy	Refers to the period between the fertilization of an ovum and the birth of a person, as well as the physical, psychological, and physiological consequences related to it.
Related Parties	<p>a) The people who control or have a Significant Influence over a company that is part of a business group or consortium to which IEnova belongs, as well as Board Members or managers and Senior Management of the companies which make up such business group or consortium.</p> <p>b) The people who have the Power to Rule over a company that is part of a business group or consortium to which IEnova belongs.</p> <p>c) The spouse, concubine, or blood or in-law relatives to the fourth degree or by affinity to the third degree, with people who respond to conditions a) and b) above, as well as the partners or co-owners of the people mentioned in such conditions with whom they have a business relationship.</p> <p>d) Companies that are part of a business group or consortium to which IEnova belongs.</p> <p>e) Companies over which one of the people referenced by conditions a) to c) above, have control or Significant Influence</p>
Religion	Refers to the set of religious beliefs, behavioral norms, and rituals by which a given group of people recognizes or pursues a relationship with one or several divinities.
Sex	Biological characteristics (genetic, hormonal, anatomical, and physiological) that are the basis for the classification of individuals as males or females of the human species at birth. There are people who are born with sexual characteristics of both sexes, known as intersexual people.
Sexual Orientation or Preferences	The capacity of each person to feel an erotic and/or emotional attraction to persons of a gender different from his or her own, of the same gender, or of more than one gender or gender identities.
Skin Color	Pigment that gives skin its color, based on its racial and genetic characteristics.
Social Status	Refers to the situation or position of a person within a community in relation to the other members.
Strategic Partners	Includes agents, intermediaries, joint ventures, clients, and local communities.
Subsidiary	A legal entity in which the Company is a shareholder and, in some way, "controls" said legal entity. The Company is said to have control over another legal entity if it has the ability to execute any of the

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	following acts: (i) directly or indirectly impose decisions at the General Shareholders Meetings or the meetings of partners or equivalent bodies, or to name or replace the majority of the Board Members, executives, or their equivalent of a company; (ii) maintain the right to, directly or indirectly, hold voting rights for more than fifty percent of the capital stock of a company; or (iii) lead, directly or indirectly, the management, strategy, and main policies of a company, be it by ownership of shares, by contract, or in any other way.
Ten Principles of United Nations Global Compact	Group of principles which derive from different universally accepted United Nations declarations in the areas of human rights, labor, environment, and anti-corruption. The goal of these principles is to generate a commitment from businesses around the world to adopt, support, and enact fundamental values with respect to human rights, labor laws, environment, and anti-corruption for their internal and external business activities.
Universal Declaration of Human Rights	Milestone document in the history of human rights for it was the first universal declaration ever made. It was proclaimed by representatives of different regions of the world at the United Nations General Assembly in Paris, as a common standard of achievement for all peoples and all nations in the protection of fundamental human rights. It encourages institutions and individuals to promote universal compliance, recognition, and respect for Human Rights through national and international measures.
Way of Thinking	Refers to how a person's ideas are formed and structured.

All these terms can be used in singular or plural, as well as in masculine or feminine, depending on the context of this policy.

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5. References and Formats

5.1 Internal References

- Code of Ethics
- GE-01 Corporate Ethics Policy
- GE-09 Sustainability Policy
- GE-20 Occupational and Process Safety Policy
- GE-21 Occupational Health and Wellness Policy
- GT-02 Salary Policy
- GE-01-P03 Procedure to Support Indigenous Communities
- GE-01-P04 Procedure for the IEnova *Contigo* Helpline
- GE-17-A02 Sanctions Framework for Non-compliance with IEnova's Policies

5.2 External References

- Universal Declaration of Human Rights
- Ten Principles of the Global Compact
- ILO Declaration on Fundamental Principles and Rights at Work
- ILO Forced Labor Convention (No. 29)
- ILO Minimum Age Convention (No. 138)
- ILO Worst Forms of Child Labor Convention (No. 182)
- Sustainable Development Goals
- Protocol to Prevent, Suppress, and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (UN)
- Protocol to Prevent, Address and Eradicate Violence in the Workplace (Mexican Ministry of Labor and Social Welfare) (*Protocolo para Prevenir, Atender y Erradicar la Violencia Laboral en los Centros de Trabajo*)
- Guiding Principles on Business and Human Rights
- Mexican Law for the Prevention and Elimination of Discrimination (*Ley Federal para Prevenir y Eliminar la Discriminación*)
- Mexican Labor Law (*Ley Federal del Trabajo*)
- Mexican General Law for the Protection of Personal Data in Possession of Bound Entities (*Ley General de Protección de Datos Personales en Posesión de Sujetos Obligados*)
- Mexican Law Granting Women Access to a Life Free From Violence (*Ley General de Acceso de las Mujeres a una Vida Libre de Violencia*)
- Meeting of Experts on Violence against Women and Men in the World of Work (ILO)

5.3 Formats

Code and Name of the Document	Retention Code

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6. Responsible Parties

Responsibility	Division
Managing the content of the policy (Policy Owner)	Ethics Director / Director of Government Relations and Sustainability / Director of Talent Management and Culture
Compliance with the policy	All employees
Oversee compliance	Legal Department / Corporate Ethics Division
Apply Sanctions	Talent Management and Culture



7. Authorization

Name	Position
René Buentello Carbonell	General Counsel and Chief Compliance Officer
Abraham Zamora Torres	Chief Sustainability, Corporate and Public Affairs Officer
Ramiro Fernández	Senior Manager for Compliance



8. Contacts (Questions and/or comments)

Questions related to the implementation or compliance with this Policy should be discussed with the immediate supervisor; the contact person designated as the responsible party for this Policy is the Talent and Culture Management division, and questions can be addressed to the Ethics reporting line at 800 062 2107. The Ethics reporting line is available 24/7. All calls made to the Ethics reporting line can be treated as confidential.

Contact	e-mail	Phone number
René Buentello Carbonell	rbuentello@ienova.com.mx	(55) 91 38 01 00
Abraham Zamora Torres	azamora@ienova.com.mx	(55) 91 38 01 00
Alejandro Ríos	arios@ienova.com.mx	(55) 91 38 01 00
Araceli Pérez	aperez@ienova.com.mx	(55) 91 38 01 00
Cristina Kessel	ckessel@ienova.com.mx	(55) 91 38 01 00

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9. Tracked Changes

Review	Date	Description	Section Affected	Observations
1	August 1, 2020	Policy review project	General	Adaptation to the new format Changes in definitions
2	October 7, 2020	Update	3.1, 3.3, 4, 5.2, 5.3	N/A
3	June 6, 2021	Update	1, 3.2, 3.3, 3.4, 4, 5.1, 5.2, 6	N/A