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## HUMAN RIGHTS POLICY – COMETAL S.A.

COMETAL S.A. is a Spanish company operating in global markets which trusts in the correct behavior of our team knowing and sharing our ethical principles which are the catalyst and guarantor of our commercial activity, carried out with full respect for human rights. COMETAL, defines its policy on human rights based on the principles of the United Nations platform "**United Nations Global Compact**" and specifically:

**Child labor:** COMETAL does not employ children or support or encourage in any way the use of child workers. COMETAL assists in the education and support of children through internationally renowned NGOs.

**Equal opportunities:** COMETAL not only does not apply nor tolerate any form of discrimination but, on the contrary, believes in the enriching value of diversity as proven throughout our entire team, which is multinational, multicultural and multilingual. Only merit and effort are considered differentiating values within our company.

**Freedom at work:** COMETAL employs only persons who have voluntarily applied to work with us and does not use or promote obligatory recruitment practices.

**Remuneration:** COMETAL employees are compensated through salaries and other benefits that we ensure are equal to or exceed the legal minimum stipulated at all times, in such a way that all current legislation is met and which provide an incentive to stay with us.

**Freedom of association:** COMETAL supports freedom of association and the right to collective negotiation and does not employ or support practices that are in any way contrary to these principles.

**Relations with Local Communities:** COMETAL values and respects the ethnic diversity and other cultural traditions and values of the local communities or indigenous peoples of the countries in which we operate and considers these to be a key condition of our performance.

Respect for human rights in COMETAL is reflected in first place by providing our employees with a safe atmosphere and working environment that is free from discrimination. We ensure that these principles are visibly reflected in our trade relations and try at all times to extend these principles to our suppliers and contractors.

Respect for human rights is declared to be essential to COMETAL and any other company in which we hold a majority share, regardless of the status of economic and cultural development of the country in which we operate and is one of our core values, along with our Commercial Code of Conduct and Statement on Conflictive Minerals, which are communicated in writing to all employees and are displayed on our website.

Madrid, 1<sup>st</sup> JANUARY 2014  
Uwe Geppert, Managing Director

