

MODERN SLAVERY DECLARATION

2026



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1. ITURRI in figures



14

países



+1.400

empleados



+10.000

clientes



+ 2.000.00

0

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 clothing, military footwear and firefighting vehicles with a high technical and innovative component.

Our ability to provide tailor-made solutions is our main differentiating feature. The personal proximity to the customer, the 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 integrate social responsibility practices, at ITURRI we have the SA8000.2014 accreditation, which is based on recognized international principles related to labour rights, derived from sources such as the International Labour Organization, 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

In the last year, we have prioritized ensuring compliance with human rights, and environmental and social policies throughout the value and supply chain. The SA8000 Certifier, SAI, through its auditing company SGS, has carried out external audits of our centres, both in Spain and in Tangier. At ITURRI we have given extreme importance to these audits on Social Responsibility



carried out by a third party. In addition, external entities are trusted to carry out internal audits and have another vision of our procedure in these matters.

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

ITURRI reinforces its commitment to human rights, labour standards, the environment and the fight against corruption through its **adherence to the United Nations Global Compact and its Ten Principles**. This international framework guides the organization's actions in the protection of human rights, non-complicity in their violation, freedom of association and collective bargaining, the elimination of forced labor, the eradication of child labor, the abolition of discrimination, the promotion of greater environmental responsibility, and the fight against corruption in all its forms.

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

Prohibition of Child Labor:

We take a strong 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 its 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 work by notifying the Labour Relations Department with specific details about the child and his/her work location. The continuity of the minor's work 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 worker 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. From our organization we would analyze 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 involved.



Monitoring and Reporting of Non-Compliance:

All employees of our company must be alert to violations of the regulations against child or forced labor during their visits to supplier or collaborating companies, reporting any irregularity through the channels that we have established for such purposes, both internal and external.

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

This structure shows our commitment to the fight against modern slavery, ensuring an ethical work environment in accordance with international standards.

During 2025, we collaborated with dual vocational training educational centers, allowing some workers to carry out internships in our facilities. These practices are carried out with all the control required by law with regard to the schedules and activities that these minors can carry out in the exercise of their training in factories.

In addition, the existence of the Iturri Foundation maintains the commitment to help those who need it, in a close, simple way, with joy and humbleness, to continue learning to do better every day. From transparency and authenticity, always working as a team, as shown in the 2025 activity report of the Iturri Foundation.

ESTAMOS ALINEADOS CON LOS OBJETIVOS DE DESARROLLO SOSTENIBLE DE LAS NACIONES UNIDAS 2030





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:

- Do not withhold personal documents of employees, such as passports, to ensure their freedom of movement.
- Do not require financial deposits from workers as a condition of their employment.
- Allow the families of workers to visit them without restrictions, promoting an environment of openness.
- Staff are not forced to work overtime, unless these are voluntary and previously agreed.

Respect for Human Rights in the Supply Chain

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

In the event that the supplier company does not have the SA8000 certification, we send a questionnaire that the company must complete with questions related to respect for Human Rights. For example, in relation to commitments not to hire minor 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 commitment document with the principles established in the SA8000 standard.

In this way, we ensure that the supplier and subcontractor companies we work with meet minimum requirements in terms of non-use 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 well-being throughout our value chain!

From our company we urge all our staff to report any violation of these standards to the Purchasing and Sustainability Department, reinforcing our commitment to ethical and respectful labor practices.

On the other hand, in relation to external communication, at ITURRI we make available to anyone external to the company a channel for queries or complaints through our website and QR codes available at the different headquarters. This Channel will be picked up by the new Compliance Committee.



In this way, we maintain different fluid and organized communication channels to respond to the different queries or incidents that may arise within our organization.

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 quality of life and safety, always complying with the legislation and procedures in each country where we operate.

The ITURRI Group is committed to conducting its business and activities in accordance with the highest legal and ethical standards. All of ITURRI's commitments in this field are set out in the Code of Ethics.

As evidence of this, ITURRI continues in 2025 to be certified under the following standards:

- ISO 37001. SG Antisoborno (Anti-bribery)
- A 19601. Criminal Compliance

4. We assess the risks

We adhere to the standards of the SA8000 standard, focusing on a rigorous risk assessment that guarantees respect for Human Rights. We conduct the assessment considering both the severity and importance of each risk in terms of human rights, human trafficking and slavery using a rating scale from 0 to 10 to determine its impact.

Our risk assessment strategy takes into account the diversity of your operations and the geographical expansion of the supply chain, paying special attention to the most critical situations. For this reason, independent and detailed risk maps are being developed for each supplier by item group.

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

This approach allows us to concentrate efforts and resources on the areas that require the most attention in terms of Social Responsibility, prioritizing those activities and localities with high levels of risk, rather than relying on an average or locations where Social Responsibility practices are more advanced.

The risks identified are assessed using an internal scale of impact and probability.



Risk Description	Rating	Impact
High staff turnover that does not allow a settling of the workforce and retain talent	Important	5
Increased cybersecurity requirements stemming from external contingencies	Important	5
Impact of climate change on the company's general guidelines, motivated by concern about the global situation	Important	5
Potential Modern Slavery Practices in Supply Chains	Moderate	3
High staff turnover in external locations (Germany, France, and England)	Moderate	3
Possible non-compliance due to new requirements of ISO 27001.2022	Moderate	3

5. Performance indicators

During the 2025 financial year, the organization continues to carry out internal and external social audits with favorable results without relevant deviations in:

- Apparel Supply Chain
- Military Footwear Supply Chain
- Suppliers considered to be at higher risk
- International supply chains

During the 2025 financial year, no significant human rights violations have been identified in the group's operations

6. Staff training

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

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

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



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General Manager of the
TURRI Group
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