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GESTIÓN DE LA CALIDAD ISO 9001	GESTIÓN AMBIENTAL ISO 14001	GESTIÓN ENERGÉTICA ISO 50001	GESTIÓN I+D+i UNE 166002	ANTISOBORNO ISO 37001	PENAL COMPLIANCE UNE 19601	SEGURIDAD INFORMACIÓN ISO/IEC 27001				
EP-0040/1997 EP-0240/2014	GA-1999/0095 GA-2014.0110	GE-2020/0023	ID-0039/2011	ASO-2018/0002 ASO-2018/0003 ASO-2018/0004	GCP-2018/0014 GCP-2018/0015 GCP-2018/0016	SI-0127/2022				

## SUPPLIER CODE OF ETHICS AND CONDUCT

GRUPO COPISA

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Version	Date of Application	Amendment
1.0	17-03-2022	Approval of the document
2.0	04-11-2024	Update of the document

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## 1. Purpose

The Copisa Group views sustainability as an integral commitment in which it seeks to create shared value for all its stakeholders through responsible performance of its business operations. Mindful of the significance of the actions of its suppliers in its value chain, it shares the values, principles and guidelines for conduct which are to underpin their behaviour anchored in the 10 Principles of the United Nations Global Compact which include human rights, labour, the environment and anti-corruption.

This Code sets out the minimum ethical, social and environmental requirements that every supplier has to meet in order to work with the Copisa Group while also undertaking to extend these principles to their own supply chains.

## 2. Scope of Application

This Code is binding for all Copisa Group suppliers and their subcontractors. If the supplier outsources part of its business, it is the supplier's responsibility to ensure that its subcontractors also comply with all the principles and provisions set out in this document.

## 3. Ethical Principles

All suppliers are required to conform to the principles of the Universal Declaration of Human Rights and the international conventions which add to it and also to follow the recommendations of the International Labour Organisation (ILO) with respect to the human rights of workers in the performance of their duties.

In particular, the supplier is to promote and respect principles including the following:

### 3.1 Integrity

The Copisa Group has zero tolerance for corruption, fraud and behaviour contrary to its Code of Ethics and Conduct.

To comply with our principles of ethics and conduct, we expect our suppliers to run their businesses ethically and act with integrity.

### 3.2 Fight against bribery and corruption

The supplier undertakes to comply with the laws, rules and regulations of the countries in which it operates, basing its activity on the value of integrity and following the principles of honesty. These commitments are reflected in the following points:

- Behaving ethically in all activities carried out for or on behalf of the Copisa Group.
- Refraining from making or offering whether directly or indirectly any payments in cash or in kind or any other type of benefit to any individual or legal entity with the purpose of illicitly obtaining any business or advantage.
- Not making facilitating or expediting payments to secure or fast-track formalities or procedures before any court, government agency or official body.

- Promoting transparency in the performance of its operations.
- Complying with prevention of money laundering regulations.
- Implementing effective control measures for preventing crime in the organisation.

**3.2.1 Antitrust**

Our suppliers are required to operate in strict compliance with applicable regulations and promote fair and ethical competition. Entering into agreements or understandings, whether express or implied, and engaging in practices that improperly or illegally restrain trade and competition or violate antitrust and competition laws are prohibited.

**3.2.2 Conflict of interests**

Our suppliers are to refrain from any activities which may create a conflict of interest and compromise objectivity or loyalty to the Copisa Group.

**3.2.3 Confidentiality**

All the Copisa Group's non-public information of which suppliers become aware as a result of their relations with the company is to be considered confidential information and handled with the safeguards set out in the General Data Protection Regulation.

All non-public information to which Copisa Group staff have access as a result of their relationship with suppliers and other stakeholders is considered confidential and privileged information and subject to professional secrecy.

**3.3 Professionalism**

The Copisa Group is committed to achieving the highest levels of customer satisfaction and we expect our suppliers to meet the same levels of quality in the products and services contracted.

**3.3.1 Quality**

Our suppliers are to ensure that the product delivered or the service provided complies with the quality standards laid down by applicable laws, rules and regulations and with any other aspect set directly by the Copisa Group.

**3.3.2 Transparency**

Suppliers are to put in place mechanisms to ensure objectivity and transparency in the performance of their operations and comply with all international, national or local corporate transparency regulations.

**3.3.3 Information security**

Suppliers are to guarantee that they implement the necessary information security measures to ensure that both digital information contained in their systems and also documentary information are appropriately protected according to their level of confidentiality.

**3.4 Respect for human rights**

Copisa Group suppliers undertake to comply with all requirements related to this issue as stipulated in the Universal Declaration of Human Rights, the standards of the International Labour Organisation (ILO) and the principles of the United Nations Global Compact. To this end, they will take all reasonable measures to ensure that human rights violations and any associated illegality are prevented.

**3.4.1 Respectful treatment**

Not to subject employees to any abusive, hostile or offensive conduct or any other form of intimidation, whether verbal or physical.

**3.4.2 Eradication of all forms of child labour**

Ensure there are no forms of child labour, complying with all international, national and local laws, regulations and declarations.

**3.4.3 Eradication of forced labour**

Ensure there are no kinds of forced or compulsory labour.

**3.4.4 Equal opportunities and non-discrimination**

Integrate equal opportunity and non-discrimination criteria for all employees based on equal opportunity regardless of age, sex, marital status, race, nationality, political or trade union opinions, religion or any other personal, physical or social condition. People management is to be based on professional merit and objective evaluations.

**3.4.5 Freedom of association and collective bargaining**

Copisa Group suppliers are to respect the freedom of association and the right to collective bargaining of their employees, ensuring that they can form and join trade unions or engage in collective bargaining freely and without fear of retaliation.

**3.4.6 Prevention, health and safety**

Suppliers are to implement preventive and corrective measures to ensure that working conditions protect the health and safety of the entire workforce and the community:

- A safe and healthy working environment which complies with occupational risk prevention requirements in accordance with international labour standards, the regulations of the country where they operate and Copisa Group standards.
- Education and training in health and safety issues for employees and other people in the surroundings who might be affected by their activity.
- Provision of material, spare parts and equipment in general which has been approved in terms of health and safety at work under applicable regulations.

**3.4.7 Privacy of personal data**

Suppliers are to uphold the right to protection of the personal data of its employees and stakeholders, safeguarding and making appropriate use of such data and in all cases abiding by applicable data protection legislation in the place where they operate.

**4. Commitments to the community****4.1 Environment**

The Copisa Group's suppliers are required to conduct their business operations responsibly by complying with the legislation in force in each country in which they operate and minimising their environmental impact, undertaking to foster the utmost respect for the environment in the performance of their operations and striving to minimise any adverse effects which they may have on the environment. Likewise, they are to help to conserve natural resources and areas of ecological, scenic, scientific or cultural interest by supporting actions which help to combat climate change and protect biodiversity including:

- Minimising the use of substances that pose a health and environmental hazard.
- Managing waste responsibly.
- Using materials and resources efficiently.
- Prioritising the use of reusable, recycled and recyclable materials.
- Using energy efficiently and reducing harmful emissions into the environment.
- These practices are to be promoted throughout their supply chain.

**4.2 Social commitment**

Our suppliers undertake to act in a socially responsible manner and are bound by the obligation to respect the cultural diversity and the customs and principles of the people and communities affected by their operations. This commitment entails recognising and valuing the specific features of each community, fostering an environment of collaboration and mutual respect in all their interactions and projects.

**5. Interpretation and compliance**

The Copisa Group's suppliers are to comply with applicable legislation in the countries in which they operate, refraining from any conduct which, albeit not in breach of the law, may harm the reputation of the Copisa Group or have adverse consequences for the company and its surroundings. Where suppliers are confronted with conflicting requirements, they are to seek solutions which enable them to comply with internationally recognised human rights while always prioritising integrity and social responsibility in their actions.

The Copisa Group provides its suppliers with a Queries/Whistleblowing Channel on the Copisa Group's website, [www.grupocopisa.com](http://www.grupocopisa.com), which has been set up for sending queries and reporting any purported breaches, which may also be done by post:

Dpto. Cumplimiento Normativo  
Plaça d'Europa 2-4  
08902 L'Hospitalet de Llobregat, Barcelona. Spain

The Copisa Group will ensure the confidentiality and anonymity of all individuals who use the whistleblowing channel. Likewise, the complaints which are processed will be dealt with by means of exhaustive analysis of potential breaches of the Code and respect for the people purportedly involved in them.

Complaints which do not include the identity of the complainant will also be assessed and processed if the evidence provided and subsequent investigations reveal an actual breach.

The Copisa Group will take the measures needed to avert adverse consequences as a result of reports made in good faith in accordance with this Code.

## **6. Non-compliance with the Code of Ethics and Conduct**

The Copisa Group's suppliers undertake to:

- Comply with this Code for as long as they remain a Group supplier.
- Notify the Copisa Group of any relevant incidents related to the requirements of this Code.

Failure to comply with this Code by a supplier may have a number of consequences for the contractual relationship with the Copisa Group. Depending on the seriousness of the breach, these consequences may range from a warning to disqualification as a supplier to the Group, notwithstanding any other legal or administrative action that may be taken.

The Copisa Group fosters communication and good faith in relations with its suppliers. Accordingly, suppliers may report any breach of this Code to the Group at any time and state their intention to remedy it.

## **7. Validity**

The revision of this Code was approved by the Copisa Group's Board of Directors on 25 November 2024 and shall remain in force until it is revised, updated or superseded with the Board's approval.