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SUPPLIER CODE OF ETHICS AND CONDUCT

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1. Purpose

Commercial Group Copisa, hereinafter “Copisa Group”, understands sustainability as a commitment of the company through the creation of shared value for all its stakeholders in the responsible development of its activities.

Aware of the importance of the performance of its suppliers in the value chain, it informs them of the values, principles and guidelines that should guide their behavior, taking as a reference the 10 Principles of the United Nations Global Compact, which include guidelines on human rights, labor, environment and anti-corruption.

This Code formalizes the minimum ethical, social and environmental requirements that every supplier must comply with in order to collaborate with the Copisa Group, assuming the commitment to extend it to its own supply chain.

2. Scope of Application

This Code applies to all Copisa Group suppliers and their subcontractors. In the case of subcontracting by the supplier, the latter shall be responsible for ensuring that its subcontractors carry out their activity in the same way, complying with all the principles contained in this document.

3. Ethical Principles

3.1 Integrity

Grupo Copisa has zero tolerance for corruption, fraud and behavior contrary to its Code of Ethics and Conduct.

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

3.1.1 Fight against bribery and corruption

- Respect the laws, rules and regulations of the countries where they carry out their activity; they will be based on the value of integrity and will develop in accordance with the principles of honesty and avoidance of all forms of corruption that jeopardize legality and fundamental ethical principles.

- To behave ethically for or on behalf of the Copisa Group:
 - Not to make or offer directly or indirectly payments in cash or in kind or any other type of benefit to any natural or legal person with the aim of illicitly obtaining any business or advantage.
 - Not to make payments to facilitate or expedite procedures, in exchange for securing or expediting the course of a procedure or action before any judicial body, public administration or official body.

3.1.2 Defense of competition

We expect our suppliers to respect fair competition and all applicable laws and regulations.

Our suppliers may not enter into any agreement or understanding (whether express or implied) or participate in any action that unlawfully or improperly restrains trade or competition or violates antitrust or competition laws.

3.1.3 Conflict of Interests

Our suppliers must avoid any activity that creates a conflict of interest that calls into question the objectivity or loyalty to the Copisa Group.

3.1.4 Confidentiality

All non-public information of the Copisa Group to which suppliers have access as a result of their relations with the company must be considered confidential information and will be managed with the guarantees provided for in the General Data Protection Regulation.

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

3.2 Professionalism

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

3.2.1 Quality

Our suppliers will guarantee that at all times the product delivered or the service provided complies with the quality standards set by the applicable laws, rules and regulations, as well as any other aspect set directly by Copisa Group.

3.2.2 Transparency

Establish mechanisms to ensure objectivity and transparency in the development of its activities and comply with all international, national or local corporate transparency regulations.

3.2.3 Information security

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

3.3 Respect for human rights

The suppliers of the Copisa Group undertake to respect all the provisions that, in this matter, are included in the Universal Declaration of Human Rights, the International Labor Organization (ILO) and the United Nations Global Compact.

3.3.1 Respectful treatment

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

3.3.2 Eradication of all forms of child labor

Ensure the non-existence of all forms of child labor, complying with all international, national and local laws, regulations and declarations.

3.3.3 Eradication of forced labor

Ensure the non-existence of all forms of forced and compulsory labor.

3.3.4 Equal Opportunity and Non-Discrimination

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

3.3.5 Prevention, Safety and Health

Preventive and corrective measures shall be implemented to ensure that working conditions protect the health and safety of the entire workforce and the community:

- Safe and healthy working environment that complies with the requirements in terms of occupational risk prevention, in accordance with the provisions of international labor standards, the regulations of the country where they carry out their activity and Copisa Group standards.
- Education and training in health and safety matters for employees and other people in the environment that could be affected by their activity.
- Supply of material, spare parts and equipment in general approved in terms of health and safety at work with respect to the regulations in force.

3.3.6 Privacy of personal data

To guarantee the right to the protection of the personal data of its employees and stakeholders, protecting and making appropriate use of such data and respecting in all cases the applicable legislation on data protection.

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

The Copisa Group assumes the commitment to ensure the greatest respect for the environment in the development of its activities, as well as to minimize the negative effects, which, eventually, these could cause.

The Copisa Group will also contribute to the conservation of natural resources and areas of ecological, scenic, scientific or cultural interest.

Copisa Group suppliers will carry out their activities in a responsible manner, in accordance with the legislation in force in each country where they operate, minimizing their impact on the environment, promoting measures to combat climate change and biodiversity, extending these good practices to their own supply chain.

4.2 Social commitment

Our suppliers are committed to acting in a socially responsible manner, assuming the responsibility of respecting the diversity of cultures and the customs and principles in force among the people and communities affected by their activities.

5. Interpretation and compliance

The Copisa Group makes available to its suppliers a Complaints Channel, established to send queries, clarify doubts about this Code, and report any alleged non-compliance with it, through the e-mail for this purpose: compliance@grupocopisa.net

The Copisa Group will guarantee the confidentiality and anonymity of all those who use the whistleblower communication channel. In the same way, the complaints that are processed will be dealt with by means of an exhaustive analysis of the possible breaches of the Code and respect for the persons allegedly involved in them.

Those complaints that do not include the identity of the complainant will also be evaluated and processed if the evidence provided and subsequent investigations evidence a real breach.

The Copisa Group will take the necessary measures to avoid adverse consequences as a result of communications made in good faith in accordance with the provisions herein.

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

Failure to comply with this Code may result in a verbal or written warning or even the loss of the contractual relationship with the Copisa Group, without prejudice to the administrative, civil or criminal liabilities that may legally arise from it.

7. Validity

The revision of this Code was approved by the Copisa Group's Board of Directors on March 17, 2022, and will remain in force until the Board approves its revision, updating or repeal.