

SUPPLIER CODE OF CONDUCT

GRUPO CUÑADO COMPANIES

I.- STATEMENT OF ETHICAL PRINCIPLES

At **GRUPO CUÑADO**, we are guided by fundamental values that are essential to our business operations and key to our ambition of achieving sustainable and profitable growth.

These values are clearly set out in our **Code of Ethics**, which is available on our corporate website. Its core principle is the strict compliance with all applicable legal requirements and the rejection of any form of corruption, while maintaining honest, ethical, and non-discriminatory relationships with third parties.

Accordingly, all our suppliers, consultants, and external professionals must be fully committed to these fundamental principles and to GRUPO CUÑADO's ethical business culture. They must understand that non-compliance with these standards is not an option, as it may result in serious liabilities for GRUPO CUÑADO and may constitute grounds for terminating the business relationship.

Therefore, suppliers shall comply with the following principles.

II.- BASIC GENERAL ETHICAL PRINCIPLES

Transparency

Suppliers shall always strive for the highest possible standards of ethical excellence by implementing practices that ensure transparency and promote integrity in the conduct of all their employees and dealings with customers.

Anti-Corruption

GRUPO CUÑADO is an organization that condemns and actively combats fraud and corruption in all its forms, including extortion and bribery. We do not tolerate corrupt practices in our commercial, administrative, or industrial relationships.

Our suppliers must ensure that no money laundering activities are carried out within their operations and shall guarantee the integrity of their financial records and any other information provided to public authorities, certification bodies, auditors, or other relevant entities. They shall maintain transparent records, conduct annual financial audits, and comply with all applicable legislation.

Human Rights

Suppliers shall support and respect internationally recognized human rights and labour principles in accordance with the **Universal Declaration of Human Rights (UDHR)**, the **United Nations Global Compact (UNGC)**, and the **International Labour Organization (ILO)**. They shall ensure that these principles are not violated through action or omission.



Equal Opportunities and Non-Discrimination

Suppliers shall provide equal opportunities in recruitment and career development, ensuring that there is no discrimination on the grounds of gender, sexual orientation, disability, race, religion, origin, marital status, or social condition.

Harassment, abuse, intimidation, discrimination, or any form of physical or verbal aggression shall neither be permitted nor tolerated in the workplace.

Suppliers shall have an **Equality Policy**, or, where legally required due to the size of their workforce, a duly registered **Equality Plan**, including measures to ensure the principle of equal pay for men and women for work of equal value, in accordance with applicable national legislation.

Employment Conditions

Suppliers shall strictly comply with all applicable local, national, and international laws, regulations, and standards governing their activities, including legal requirements relating to minimum wages, overtime, and employee benefits.

With regard to occupational health and safety, suppliers shall take all necessary measures to comply with applicable European Directives, Spanish Law 31/1995 on Occupational Risk Prevention and its subsequent amendments, Royal Decree 486/1997 on Workplace Health and Safety, and all other applicable legislation, ensuring that preventive measures are effectively implemented and kept up to date.

Violence and Harassment

GRUPO CUÑADO rejects violence, exploitation, and harassment in all their forms. We do not tolerate any conduct that undermines the dignity of our employees.

Forced Labour

We support the abolition of all forms of forced or compulsory labour so that every individual has access to decent work. Corporal punishment, coercion, exploitation, and verbal or physical abuse are strictly prohibited.

Child Labour

GRUPO CUÑADO supports the elimination of child labour and ensures compliance with the minimum legal working age.

Environmental Protection and Corporate Social Responsibility

Suppliers shall actively and responsibly contribute to environmental protection by adopting environmentally responsible practices appropriate to their activities and complying with the Company's quality and environmental policies.

They shall promote the efficient use of natural resources and the prevention of environmental pollution.

Freedom of Association

Suppliers shall respect freedom of association, allowing employees to freely establish and join trade unions or other representative organizations of their choice, as well as exercise their right to collective bargaining without discrimination.

Prevention of Sexual Harassment, Gender-Based Harassment, and Workplace Harassment

Suppliers shall prevent all forms of harassment and reject any conduct that violates the dignity of employees. They shall establish and maintain appropriate protocols for the prevention of sexual harassment, gender-based harassment, and workplace harassment, ensuring that these are available to all employees.

Conflicts of Interest

A conflict of interest arises when the personal interests of an employee or those of a third party conflict with the interests of GRUPO CUÑADO. Suppliers shall always act in the best interests of GRUPO CUÑADO, making appropriate use of the resources made available to them and avoiding any conduct that could be detrimental to the Company.

All dealings between suppliers and GRUPO CUÑADO employees shall be conducted lawfully and ethically. Supplier selection shall be based on objective and transparent criteria that can be properly documented.

The offering, promising, or giving of any payment, commission, gift, or other benefit to any employee and/or public official is strictly prohibited, whether made directly or indirectly through intermediaries or related persons or entities.

Gifts or donations received by employees from customers or suppliers that fall outside normal business practices are considered inappropriate. Normal business practice refers exclusively to customary business courtesies of modest value.

Confidentiality

Our organization is committed to maintaining the confidentiality of all confidential and proprietary information received from third parties.

Suppliers shall maintain professional confidentiality regarding any non-public information obtained as a result of their business relationship with GRUPO CUÑADO, whether relating to other customers or to GRUPO CUÑADO itself. In particular, such information shall not be used for any purpose other than the relevant business relationship.

This confidentiality obligation shall remain in force even after the termination of the business relationship with GRUPO CUÑADO.



Fair Competition

Our Company supports initiatives that promote and protect free competition. Suppliers shall respect the principles of fair competition and the intellectual and industrial property rights of third parties.

Data Protection

Suppliers shall implement appropriate measures to safeguard any personal data they process and establish procedures to prevent unauthorized access to or misuse of such data. Any processing of personal data relating to employees, customers, distributors, suppliers, or other third parties shall be carried out in accordance with applicable data protection legislation.

Prevention of Money Laundering

Suppliers shall comply with all applicable legislation relating to the prevention of money laundering.

III.- COMPLIANCE BODY

GRUPO CUÑADO has established a Compliance Body responsible for overseeing and developing the Company's internal policies. This body is responsible for interpreting this Code of Ethics and adopting the recommendations and decisions necessary for its implementation.

IV.- WHISTLEBLOWING CHANNEL

In accordance with applicable legislation, GRUPO CUÑADO has established a Whistleblowing Channel available to employees, customers, and suppliers. Any breach of this Code of Ethics or any suspicion of unlawful conduct shall be reported through this channel.

V.- DECLARATION OF COMPLIANCE

As a supplier of GRUPO CUÑADO, you are responsible for complying with these standards and for implementing processes to monitor your legal and regulatory compliance. GRUPO CUÑADO reserves the right to request documentary evidence demonstrating such compliance.

In acknowledgement and full acceptance of these standards, the undersigned hereby signs this document.