

Document:

SUPPLIERS’ CODE OF ETHICAL CONDUCT

| Revision | Change control                  |
|----------|---------------------------------|
| 00       | Original Version – October 2024 |
| 01       | Update – December 2024          |

Developed by: NGH (Sustainability and Corporate Organization Department)

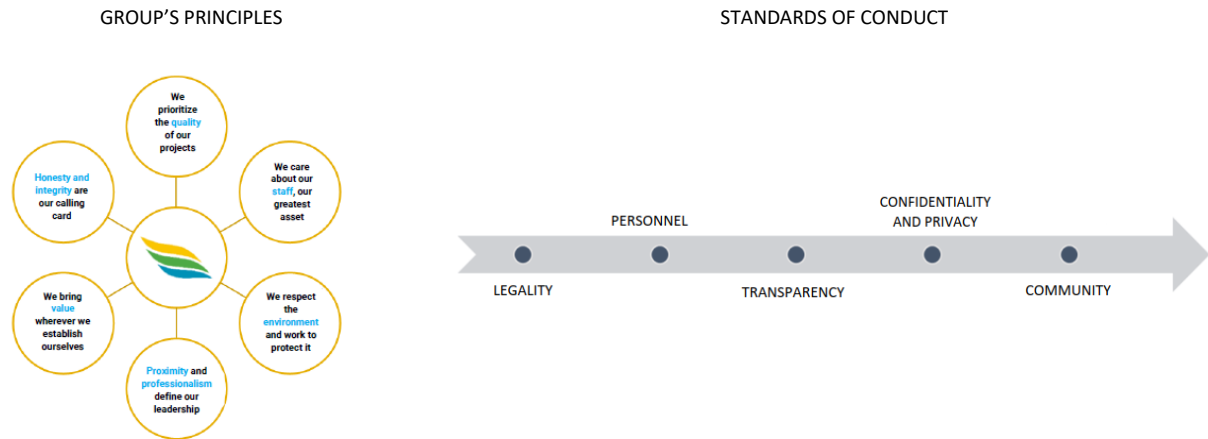
Approved by: RAG (Managing Director)

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## INTRODUCTION

The GHENOVA Group, hereinafter referred to as the “**Group**” or “**GHENOVA Group**”, governs its activities according to the principles established in its sustainability policy and in accordance with the conduct guidelines outlined in its Code of Ethical Conduct, which is a central element of the Group's Compliance Program.



This Suppliers Code of Ethical Conduct (hereinafter referred to as the “**Code**”) reflects our commitment to the highest standards of ethics and responsibility, outlining the guidelines of conduct that our suppliers must adhere to in order to be considered collaborators. For the GHENOVA Group suppliers are essential strategic allies in achieving the Group's objectives of sustainability, quality, transparency and excellence, which is why it requires that they share the principles and guidelines for action with which the Group operates.

## SCOPE OF APPLICATION

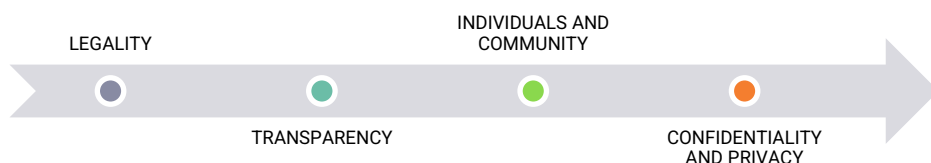
This Code outlines specific principles and guidelines that must direct the behavior of all “**Subject Personnel**”, including the following:

- Suppliers
- Contractors
- External collaborators
- Any person acting under their supervision.

These guidelines must be observed in all business relationships, both with the Group and with third parties, including, among others, government officials, clients and other suppliers.

## SUPPLIERS STANDARDS OF CONDUCT

The GHENOVA Group applies its guidelines of conduct to Subject Personnel, related to the following areas:



## **Adherence to legality and professional ethics**

### **Regulatory compliance**

Subject Personnel commit to strictly comply with all applicable laws and regulations in the countries where they operate, including those related to the protection of rights, working conditions, safety, environmental protection, antitrust laws, and financial obligations.

Additionally, in areas requiring specific and detailed regulation, the standards outlined in this Code are further supplemented by the provisions set forth in other GHENOVA Group codes and policies, which must also be adhered to by the Subject Personnel.

### **Combating bribery, corruption and conflicts of interest**

Subject Personnel undertakes a strong commitment to professional ethics and regulatory compliance, explicitly rejecting fraud, corruption, and terrorism.

Subject Personnel commit not to offer, accept, or influence third parties or GHENOVA Group's employees to offer, accept or receive bribes, illegal payments, or anything of value for improper purposes.

Subject Personnel must implement effective systems to prevent illegal activities, including, but not limited to, corruption, embezzlement, and money laundering.

Notify the Group immediately of any wrongdoing or any situation that may create or appear to create a conflict of interest, ensuring that professional judgment and responsibilities remain impartial and are not compromised by external influences or personal interests.

## **Transparency and integrity**

### **Integrity**

Subject Personnel are required to conduct due diligence and thorough background checks on their Collaborators to ensure the integrity and transparency of the supply chain, as well as strict compliance with international regulations, including those related to trade sanctions and embargoes.

The selection of employees, partners, contractors, agents, or subcontractors (hereinafter referred to as the "Collaborators") must be based on merit and competitiveness, ensuring that said Collaborators act in accordance with this Code and comply with all applicable regulations in their activities for or on behalf of the Group.

### **Corporate image and reputation**

Subject Personnel must preserve the Group's image and reputation with the highest level of care, ensuring their correct and appropriate use in all professional actions.

This responsibility includes conducting due diligence to ensure that Collaborators uphold these values, as well as maintaining the respectability of the organizations and causes with which they are affiliated

## **Responsibility to people and community**

### **Human rights and labor practices**

Subject Personnel must support and uphold the protection of universal human rights, ensuring that they do not violate these rights through actions or omissions, and that they consistently comply with all applicable regulations in this area.

The responsibility of Subject Personnel to ensure respect for human rights entails the following:

- Maintaining labor practices that comply with applicable international and national regulations, ensuring respect for the labor rights of its Collaborators, including compliance with regulations on working hours, the

management of overtime, and the payment of at least the statutory minimum wage required by applicable legislation;

- Implementing training programs to educate all Collaborators on human rights issues, their importance and the necessary measures for protection;
- Rejecting all forms or modalities of forced or compulsory labor, human trafficking, slavery, or servitude, and implementing appropriate measures within their organization to eliminate these practices. All work must be performed voluntarily, without threat of punishment or sanction, and must not involve deceit;
- Contributing to the eradication of child labor by rejecting its use and adhering to the minimum hiring ages established by applicable regulations in the countries where they operate. To this end, they must have effective and reliable mechanisms in place to verify the age of their Collaborators;
- Reject any discriminatory practices based on any condition or characteristic related to employment and occupation, treating its Collaborators fairly, with dignity and respect, based on equal opportunities. Additionally, any form of violence, exploitation, sexual, physical, psychological, or moral harassment, abuse of authority, or mistreatment, as well as any behavior that could create an intimidating or offensive environment regarding individuals' rights, must be rejected;
- Guarantee and facilitate the exercise of the rights to association, to join trade unions, and to engage in collective bargaining for its Collaborators, always in accordance with applicable laws and regulations;
- Regularly monitoring and evaluating compliance with human rights standards, with a commitment to corrective actions when violations occur;
- Respect the legal employment quotas of individuals with disabilities in accordance with the legislation of the countries where the company operates, supporting the labor integration of this group.

In situations of conflicting demands, Subject Personnel must explore alternatives that ensure the respect for internationally recognized human rights.

### Health and safety

In addition to complying with minimum legal and regulatory requirements for working conditions, Subject Personnel must provide a safe and healthy work environment, and respect the health and safety laws in force, for which Subject Personnel must:

- Identify and assess potential risks in the work environment, implementing emergency preparedness and response plans and procedures;
- Adopt necessary measures to protect the health and safety of their Collaborators and third parties providing services at their facilities, reducing hazards and minimizing risks through effective preventive and protective measures in accordance with international conventions and current legislation.
- Train its personnel in occupational risk prevention, providing them with the necessary means to ensure their safety in the work environment.
- Promote the proactive identification of any unsafe condition or act that could compromise the integrity of persons or facilities.

### Environmental protection

Subject Personnel must conduct their activities responsibly, in compliance with the laws in force in the countries where they operate, minimizing their environmental impact.

From the Subject Personnel, the Group expects to carry out their activities in a manner that reduces the waste of energy, water, and other resources, and to recycle whenever possible.

## Confidentiality and privacy

### Confidentiality, Data Protection and Intellectual and Industrial Property

Subject Personnel is committed to maintain confidentiality regarding any data or information they may encounter through their business relations, whether it originates from or pertains to the Group, its clients, suppliers, or any other third party. This includes personal data, sensitive business information, intellectual and industrial property, or privileged information (the “**Confidential Information**”).

Such Confidential Information may not be disclosed, transferred, or shared without the prior written consent of the GHENOVA Group, except with Collaborators of the Subject Personnel who have a legitimate need to access and use it.

Additionally, Subject Personnel is required to comply with applicable legislation on data protection, privacy, and intellectual and industrial property. In the event that personal data is processed on behalf of the Group within the framework of business relations, they must adhere to the Group’s data processing guidelines (lawfulness, fairness, transparency, and confidentiality) and ensure the protection and respect of related intellectual and industrial property rights.

### Information security

Subject Personnel must implement appropriate information security measures to protect the information collected in the course of their business relationships, based on its level of confidentiality. Additionally, they must establish an effective control model to verify the effectiveness of these measures, ensuring that the control model itself regularly reviewed and updated.

## ENFORCEMENT AND SANCTIONS

The behavior of Subject Personnel, as well as that of anyone acting under their supervision, must comply with this Code, maintaining a collaborative and responsible attitude in identifying situations of actual or potential non-compliance. Additionally, Subject Personnel must actively cooperate in any compliance audits and verifications that may be required, providing all relevant, complete, and truthful information, and taking the necessary corrective actions based on the results of such verifications.

Subject Personnel commits to reporting in good faith any alleged violations of the Code or relevant information that may legally, economically, or reputationally affect the Group. Non-compliance with the Code can have negative repercussions on the relationship between Subject Personnel and the Group. It may also result in the termination of the contractual relationship or disqualification as a supplier, without prejudice to any other legal or administrative actions that may apply.

Violations of this Code will be analyzed on a case-by-case basis and will be sanctioned according to all applicable internal procedures, agreements, and legal requirements.

## WHISTLEBLOWER CHANNEL AND INTERNAL COMMUNICATION SYSTEM

The GHENOVA Group has a whistle-blowing channel that allows individuals to confidentially inform the Ethical Conduct Committee about alleged breaches of the Code, as well as potential irregularities of a financial and/or accounting nature or any other fraudulent activities within the organization.



**Whistleblower channel GHENOVA Group**

## COMMUNICATION AND DISSEMINATION AND EVALUATION

The GHENOVA Group will take the necessary measures to disseminate and communicate the content of this Code to Subject Personnel.

It is the responsibility of the organizational unit responsible for subcontracting and purchases to make this Code available to Subject Personnel.

The content of this Code will be updated and revised periodically, following the same procedure as when it was drawn up, and adapting it to changes in the company in general and the Group in particular, and the latest approved version will be available on the website.

## APPROVAL AND EFFECTIVE DATE

This Code is a translation of the original Spanish version. In case of any discrepancies, the Spanish version will prevail.

This Code and any subsequent updates will come into effect upon approval by the Group Management in its Spanish version.