



SUPPLIERS CODE OF
CONDUCT



INDEX

| | | |
|-----|---------------------------------------------------------------|----|
| 1 | INTRODUCTION | 3 |
| 2 | SCOPE OF APPLICATION..... | 3 |
| 3 | COMMITMENTS FOR A RESPONSIBLE MANAGEMENT OF THE SUPPLY CHAIN4 | |
| 3.1 | CORPORATE ETHICS AND INTEGRITY..... | 4 |
| 3.2 | LABOUR PRACTICES | 5 |
| 3.3 | HEALTH AND SAFETY..... | 8 |
| 3.4 | ENVIRONMENT | 8 |
| 3.5 | QUALITY AND SAFETY OF PRODUCT..... | 9 |
| 3.6 | COMMITMENTS WITH LOCAL COMMUNITIES AND SOCIETY..... | 9 |
| 3.7 | MANAGEMENT OF THE SUPPLY CHAIN..... | 10 |
| 4 | COMPLIANCE WITH THE CODE..... | 10 |
| 5 | QUERIES AND COMPLAINTS | 11 |
| 6 | APPROVAL AND OPERATION OF THE CODE..... | 12 |



1 INTRODUCTION

This Code of conduct for suppliers (the “Code”) is developed on the grounds of the mission, vision and values of Grupo IGNIS (or the “Company”) and is in line with other internal codes and policies of the Group as a result of its commitments on sustainability, specifically, with respect to the management of the supply chain.

In order to achieve real efficient sustainability it shall not be limited to the action of the company but rather be extended to the rest of the supply chain. The purpose of Grupo IGNIS is to establish commercial relations with companies or professionals respecting the basic principles of action considered in the Code inviting to extend the commitments to the relevant supply chains for each supplier respecting their management autonomy and applying the practices and procedures contained in Grupo IGNIS regulation with respect to purchases.

2 SCOPE OF APPLICATION

The Code applies to all directors, professionals, suppliers of goods or services or contractors and subcontractors working for Grupo IGNIS or for anyone having any kind of contractual relationship with Grupo IGNIS (hereinafter the “Supplier” or the “Suppliers”).

Code observance does not exempt from fulfilling any other rules of application pursuant to the legislation applicable where Grupo IGNIS operates as well as to the contractual conditions of each supplier.

Grupo IGNIS reserves the right to verify throughout the term of the contract that the Supplier maintains the conditions taken into account upon contracting.



3 COMMITMENTS FOR A RESPONSIBLE MANAGEMENT OF THE SUPPLY CHAIN

Below there is a list of principles that Grupo IGNIS considers basic to start and/or hold any commercial relationship with a potential or actual Supplier.

This section is only as way of example and is based among other on the main International Conventions on Human Rights. In that sense, the principles below may include all sorts of conducts which, for the sake of sound judgment may be considered included therein.

3.1 Corporate ethics and integrity

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| <i>Extortion, corruption and money laundering</i> | <ul style="list-style-type: none">✓ Do not exercise or tolerate any form of corruption, extortion, embezzlement or money laundering.✓ Do not offer Grupo IGNIS's employees any sort of gift or personal benefit which may be considered as bribery. It is understood that gifts of irrelevant or symbolic value and that respond to courtesies are excluded.✓ Do not make gifts to unduly influence in a commercial relationship or breach the legislation applicable or ethical principles.✓ Implement a criminal compliance program or enough measures to avoid falling under conducts which may be considered as extortion, corruption and money laundering. |
| <i>Conflict of interests</i> | <ul style="list-style-type: none">✓ Avoid any situation involving a conflict of interests in commercial relationships. Therefore and in order to preserve its independence they shall identify and solve any situation of conflict of interests either real or potential, arising with any employee.✓ Implement a criminal compliance program or enough measures to avoid falling under any situation of conflict of interests. |
| <i>Privacy and Confidentiality</i> | <ul style="list-style-type: none">✓ Neither disclose nor use unduly insight, confidential or secret information obtained from the relationship with IGNIS.✓ Guarantee privacy protection and intellectual rights of Grupo IGNIS as well as of its employees, clients |



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| | and other groups of interest. |
| <i>Commercial practices</i> | ✓ Do not exercise irregular commercial practices including those representing price manipulation or others breaching the principles of action in the market, consumers or any legislation applicable from time to time. |
| <i>Transparency and cooperation</i> | ✓ Inform Grupo IGNIS of any irregular payment, transaction suspicious of money laundering. ✓ With respect to processes for the verification of fulfilment of this Code, Suppliers shall: <ul style="list-style-type: none">• Collaborate with Grupo IGNIS, providing all necessary information.• Neither offer nor accept any remuneration intended to interfere in verification processes.• Neither manipulate nor influence workers or forge documentation to alter the outcome of such processes. |
| <i>Data Protection</i> | ✓ Register and treat personal data collected, stored and/or used fulfilling the obligations envisaged in Organic Law of December 5, on Personal Data Protection and guarantee of digital rights. (or actual regulations from time to time and in any territory), guaranteeing the acknowledgement of the rights legally established. ✓ Protect personal data avoiding: <ul style="list-style-type: none">• Their assignment to unauthorized individuals.• Undue access to such information. |

3.2 Labour practices

Grupo IGNIS extends to its Suppliers the expectation of fulfilment of the fundamental principles and rights included in the Universal Declaration of Human Rights as well as the rights at work envisaged in the International Labour Organization Declaration on Fundamental Rights and Principles at Work (ILO, 1998) and other ancillary conventions.



It is essential that Suppliers, regardless of the country where they carry out their activity, act diligently and responsibly to prevent, detect or mitigate situations which may compromise human rights as well as labour rights, acknowledged both national and internationally. It is expected that Suppliers will show conducts in line with the guidelines of the UN Global Compact, the Principles governing the company and Human Rights and the Guidelines of the OECD for corporations.

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| <i>Prohibition of forced labour and human trafficking</i> | <ul style="list-style-type: none">✓ No form of forced labour including bondage-regime labour, debt bondage, forced labour in prison, slavery or human trafficking will be tolerated.✓ No production resources or products related to forced labour promoted by the State will be provided.✓ Avoid the sale of minerals in conflict. |
| <i>Prohibition of child labour</i> | <ul style="list-style-type: none">✓ No form of child labour pursuant to the provisions of Convention 138 of the International Labour Organization (ILO) and the principles of the UN Global Compact will be tolerated. |
| <i>Work conditions</i> | <ul style="list-style-type: none">✓ Physical punishment, sexual or racial harassment, verbal or power abuse or any other form of harassment or intimidation will be tolerated.✓ Ensure that working hours and remuneration of employees will satisfy their basic needs and the needs of their families with a remuneration consistent with the duties carried out as well as in compliance with legislation and ILO standards applicable to working hours, minimum salary and social security.✓ Provide legal contract to all employees declining any practice far from this principle.✓ Ensure the respect for the right to vacations, rest and conciliation of professional, personal and family life as well as the development of actions seeking physical and emotional health of employees.✓ Carrying out training initiatives which allow the training and qualification of employees to safely develop their tasks, unfold and adapt to the different needs in the development of their tasks. |
| <i>Freedom of association and collective bargaining</i> | <ul style="list-style-type: none">✓ Guarantee trade union freedom, the right to association and collective rights of professionals without involving any sort of damage, retaliation or discrimination.✓ Protect in any circumstance, the right to strike and the right to collective bargaining, protecting the freedom of |



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| | operation of employees' organizations pursuant to their Articles and standards without authorities' interference. |
| <i>Inclusion and Diversity</i> | ✓ Actively promote an inclusive work environment boosting diversity in its different dimensions. |
| <i>Equal treatment and opportunities</i> | <ul style="list-style-type: none">✓ Encourage equal treatment under a policy that completely rejects abusive or hostile conducts such as discrimination by race, sex, sexual orientation, beliefs, ideology, religion, social origin, disability, nationality, age, affiliation to trade unions or any other legitimate criteria according to current legislation; or labour harassment, either sexual or of any other kind.✓ Guarantee equal opportunities among employees guaranteeing the selection and promotion of employees based on objective criteria of merits and capacity and the same salary for work with the same value. |



3.3 Health and safety

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| <i>Work environment</i> | ✓ Guarantee that employees exercise their activity in a safe and healthy workplace pursuant to the international legislation and conventions applicable with respect to safety, hygiene and health at work. |
| <i>Preventive management</i> | ✓ Identify and assess risks and potential emergency situations. On the grounds of the results obtained, the necessary plans and procedures will be created for the reduction and elimination of such risks. |
| <i>Training</i> | ✓ Provide its employees with regular training on health and safety at work for them to be able to ensure their safety and that of their professional environment. |
| <i>Protection material</i> | ✓ Supply the material, spare parts and devices in general homologated with respect to health and safety at work pursuant to the current legislation. |

3.4 Environment

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| <i>Regulatory compliance</i> | ✓ Comply with the current environmental regulations. |
| <i>Reduction of impact</i> | ✓ Adopt the necessary measures to eliminate or reduce the most relevant impacts of its activity giving priority to: <ul style="list-style-type: none">• Biodiversity preservation.• Preservation of resources and reduction of wastes and emissions through process circularity. |
| <i>Management of hazardous substances, wastes, spills and emissions</i> | ✓ Manage in a safe manner for the environment all hazardous substances, wastes, spills and emissions created during its activity applying the appropriate prevention measures to avoid environmental accidents. ✓ Comply with the applicable legislation with respect to the management of hazardous substances and materials. |



3.5 Quality and safety of product

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| <i>Product and/or service quality</i> | <ul style="list-style-type: none">✓ Guarantee at all times that the product delivered or the service provided meets the quality and safety standards established by the law, regulations and standards applicable as well as any other requirement included in the contract with Grupo IGNIS. |
| <i>Exhaustive and transparent information</i> | <ul style="list-style-type: none">✓ Provide true information on products and/or services provided easing the understanding of the terms, conditions, benefits, risks and costs of products and/or services. |
| <i>Product safety</i> | <ul style="list-style-type: none">✓ Ensure the correct labelling and packaging pursuant to the provisions of the local legislation and if applicable, international agreements on the transport of hazardous goods.✓ The supply of chemical materials shall come with the relevant Data Safety Sheets and any additional information which may allow a correct and safe manipulation and storage. |

3.6 Commitments with local communities and society

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| <i>General principles</i> | <ul style="list-style-type: none">✓ Implement the necessary measures to avoid negative impact on personal and professional traditions and customs of those living in the areas of operation.✓ Ensure fulfilment of local laws and respect of rights, culture, customs and values of people of local communities and minorities potentially affected by the development of the activities with special consideration of vulnerable groups. |
| <i>Indigenous Communities</i> | <ul style="list-style-type: none">✓ Respect the rights of indigenous population, tribes and local pursuant to the current legislation and with Conventions 107 and 169 of the ILO. |
| <i>Displacement and/or evictions</i> | <ul style="list-style-type: none">✓ Attending the provisions of the Basic principles and Regulations of United Nations on Displacement and Evictions consequence of the Development (2007).✓ Consulting local communities on activities, projects, strategies or works affecting their territories and life through a Free, Prior and Informed Consent process (CLPI for its Spanish initials) using the appropriate cultural procedures. |



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| <i>Dialogue and listening</i> | ✓ Encourage transparent, ethical and collaborative dialogue with groups of interest in order to know their expectations, establish alliances and create effective and valuable contributions. |
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3.7 Management of the supply chain

It is expected that in order to boost the positive impact of a responsible and sustainable operation, Grupo IGNIS's Suppliers will apply in turn these principles to the suppliers of their supply chain and create their own communication and whistleblowing channels for their respective groups of interest to notify potential issues regarding the fulfillment of the principles of this Code.

4 COMPLIANCE WITH THE CODE

Any individual, company or organization considered as a Supplier of Grupo IGNIS undertakes to:

- Fulfill the provisions in the obligations established herein.
- Inform Grupo IGNIS immediately on any suspicion or evidence of breach or violation of the principles of the Code of which he/she may be aware of.
- Implement the necessary measures to prevent, manage and mitigate the commission of any kind of conduct which may represent a breach of the Code.

The Company shall provide all necessary resources to guarantee the effective communication and dissemination of the Code to Suppliers and other groups of interest promoting training and awareness actions.

Before establishing any contractual relation, all Suppliers will be requested to accept this Code as well as the transparent collaboration with compliance and audit bodies of the Company providing the information requested and access to premises.

In the event of breach of this Code, Compliance and Procurement departments along with all other departments involved from time to time,



shall implement all legal and contractual actions applicable among other, the suspension or termination of the contractual relation without the right to compensation by Grupo IGNIS, the communication to authorities and the potential claim for damages as compensation for the losses suffered by the Company due to such breach.

Termination will be the last option following several failed attempts to prevent or mitigate severe impact when such adverse impacts are irreparable, when there is no reasonable perspective of change or when the Supplier causing such impact does not apply immediate measures to prevent or mitigate the impacts identified.

5 QUERIES AND COMPLAINTS

Grupo IGNIS makes available for all Employees as well as for third parties the Internal Information System (hereinafter the “Whistleblowing Channel”) for any party interested in reporting incidents, queries, doubts or complaints regarding the breach of the commitments of this Code as well as all other internal and external regulations applicable.

The Whistleblowing Channel is available on Grupo IGNIS corporate website for its use by all those Employees and third parties that require it.

Any Employee who is aware or has reasons to strongly suspect of a breach of this Code or of conducts or acts contrary to the legal system shall contact through the Whistleblowing Channel with the Compliance Officer immediately.

The Whistleblowing Channel of Grupo IGNIS fulfils all demands and guarantees provided for Law 2/2023, of February 20, regulating the protection of persons who report regulatory violations and the fight against corruption, guaranteeing:

- Confidentiality of information.
- Lack of retaliation against the informant.
- Integrity of the traceability and management of complaints and/or queries made in good faith.

The Compliance Officer shall initiate an investigation in case of detection of signs of an irregularity provided for in the Code and/or in the applicable legislation and shall



notify the beginning of such investigation to the informant and if applicable, the person denounced.

6 APPROVAL AND OPERATION OF THE CODE

This Code is an adaptation of the Code approved on 2 November 2022 which it supersedes and has been approved by the Board of Directors of Grupo IGNIS on July 6th, 2023.

Since its approval the Code is included in the regulations of Grupo IGNIS being in force until its annulment, revoke or update.

The Code is subject to periodical revision and update processes in order to adjust it to the applicable regulations from time to time, to the social and professional reality and context of the Company.

In the event of any update of the Code the interested parties will be timely informed using the communication mechanisms provided for by Grupo IGNIS.