



# Code of Conduct for Suppliers



## Grupo Satec

**Project:** Code of conduct for suppliers

**Security level:** N0 - Public

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# Change Log

Version	Date	Reviewer	Summary of changes produced
1.0	05/14/2019	CSR Committee	First version

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## 1\_ Introduction

Grupo Satec's behavior guidelines in relations with its supplier companies are based on maintaining ethical relations that guarantee the normal development of commercial exchanges, mutual satisfaction, and benefit. In addition, Grupo Satec, in its commitment to sustainability, wants to progressively promote the principles and requirements of social responsibility in its supplier companies, hoping that both they and subcontracted companies share the principles described in this Code of Conduct for suppliers, and expects them to ensure that subcontractors, intermediaries or other supplier companies, to whom they turn for the preparation or acquisition of products or services destined for Grupo Satec,

This Code of Conduct for Supplier Companies includes the ethical principles and rules of conduct that our supplier or subcontractor companies must maintain for the proper development of their activity, being applicable to all supplier or subcontractor companies of Grupo Satec

## 2\_ Application regulations

The supplier companies of Grupo Satec will guarantee in all their actions and, in turn, in their relations with their main contractors and supplier companies, strict compliance with current national legislation and any other applicable in each workplace in the that carry out their activities and will respect this Code and the internationally recognized Fundamental Rights of people, work and the environment.

Likewise, they will guarantee the respect and fulfillment, by both parties, of the conditions established in the contract and will adopt the appropriate measures to exclude practices of corruption, extortion, embezzlement, and bribery; not offering or accepting any type of illegal incentives.

## **3\_ Labor conditions**

Supplier companies must strictly comply with all national and international standards and regulations, including the Fundamental Conventions of the ILO and the Universal Declaration of Human Rights of the United Nations, in particular regarding:

### **3.1. Forced labor**

Supplier companies will reject any form of forced or compulsory labor and will not benefit in any way from work carried out against the will of people or required of a person under the threat of any negative consequence if not provided. Workers will be free to leave employment with reasonable notice.

### **3.2. Child labor**

The supplying companies will guarantee the absence of child labor, not using, at any stage of their activities, the labor of people who have not reached the minimum age legally established in each country to access work and that must never be less than the established age. by the International Labor Organization.

### **3.3. Equal opportunities, non-discrimination and abuse**

Supplier companies will reject any discriminatory practice in terms of employment and occupation and will treat their staff with respect and dignity, ensuring at all times the absence of situations of discrimination based on sex or sexual orientation, race, origin, marital status, social condition, , religious, political or union ideas, age or disability, which have the effect of nullifying or altering equal opportunities. These aspects will be taken into account in terms of selection, training, remuneration, promotion or termination of contracts.

Likewise, human rights will be respected, and no employee will be subjected to physical, sexual, psychological or verbal harassment, degrading treatment or any other type of abuse.

### **3.4. Decent employment**

The personal dignity, privacy and rights of the worker will be respected, who will be remunerated, at least, in accordance with the legal regulations in force in each country, and who will be guaranteed the right to rest, overtime pay, protection maternity leave and working hours, in accordance with said applicable labor regulations.

### **3.5. Freedom of association and respect for collective bargaining**

Supplier companies will respect the freedom of union association and the right to collective bargaining of workers, subject to the applicable regulations in each case.

### **3.6. Occupational health, safety and hygiene**

Supplier companies must guarantee a safe and healthy work environment, in which risks are controlled and the necessary preventive measures have been taken against accidents and occupational diseases; having established a management system in accordance with applicable occupational risk prevention regulations.

## 4\_ Environmental aspects

Grupo Satec is committed to protecting the environment and expects correct environmental management from its suppliers, which respects the environmental laws and regulations that are applicable in each case, and which promotes environmental protection trying to reduce, as far as possible, the impact on the environment of its activities through the promotion of the efficient use of energy, water and natural resources, the preference for renewable energy, the correct disposal of waste and the reduction of greenhouse gases.

Grupo Satec will value positively, with respect to supplier companies, having certification in environmental matters.

## 5\_ Business ethics

Grupo Satec has implemented a zero-tolerance policy regarding offering or accepting bribes, or committing bribery, regardless of local laws or customs, and considers integrity and trust to be essential requirements for the maintenance of its business relationships, which will be chaired by the most high standards of business ethics and regulatory compliance on this matter, particularly with regard to:

### 5.1. Corruption

Grupo Satec expects its supplier companies to carry out their business activity with integrity, objectivity, transparency and honesty, without participating in bribery, corruption, extortion or any other illegal or unethical practices. Therefore, the supplier companies of Grupo Satec will not promise, offer or pay, directly or indirectly, any bribe to facilitate transactions or other improper payments to any third party or to any professional of the companies of the Satec Group in relation to their contracts with them.

Grupo Satec requires all its supplier companies to prohibit the acceptance or offer of any kind of gifts, commissions, compensation or any other offer that could condition the objectivity and independence of the contracting process, understanding that objectivity and independence are compromised in the decision of contracting when said offers are considered disproportionate in relation to the good uses and customs in the commercial relationship, and without these offers or gifts, the contract would not have been obtained.

### 5.2. Conflicts of interest

The relations between Grupo Satec and its supplier companies will always be governed by objective criteria, therefore, the supplier companies must have implemented mechanisms that guarantee that the independence of the supplier company's actions and its full subjection to the applicable legislation will not be affected. In the event of a potential conflict of interest of any of the people on your staff.

### 5.3. Fair competition

The companies supplying Grupo Satec will manage their companies in a manner consistent with fair competition and respect for market regulations and always in accordance with current applicable regulations.

### 5.4. Confidentiality of Information and intellectual property

Grupo Satec is committed to the security of information and the protection of personal data, which is why it requires its supplier companies to comply, without exception, with current legislation on data protection and intellectual property, adopting the measures sufficient security to protect the information and guarantee the confidentiality of the information that is entrusted to it by Grupo Satec in the development of its commercial relations, unless Grupo Satec has previously and expressly authorized its dissemination.



## 6\_ Breaches

Failure, by the supplier company, to comply with any of the points described throughout this Code of Conduct, may have different consequences in the contractual relationship with Grupo Satec, from a warning to the possibility of requesting the termination of the contract that unites both parties, without prejudice to other legal or administrative actions that may be applicable.

## 7\_ Acceptance and adhesion

The supplier company acknowledges having read and understood the terms and conditions expressed in this Code of Conduct for Supplier Companies and confirms its acceptance, adhesion and commitment to comply with it.

(Signature and stamp)

<b>Company</b>	
<b>Name of the signatory</b>	
<b>Post</b>	
<b>Date</b>	