



# Code of Conduct for Supplier Companies



## Grupo Satec

**Project:** Code of Conduct for Supplier Companies

**Security level:** N0 - PUBLIC

**Date:** 14/05/2019, **Version:** 1.1



# Change Log

Version	Date	Reviewer	Summary of the changes produced
1.0	05/14/2019	CSR Committee	Initial version
1.1	06/27/2024	RCU	First version

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## 1\_ Introduction

Grupo SATEC's behavioral guidelines in relations with its supplier companies are based on the maintenance of ethical relations that guarantee the normal development of commercial exchanges, mutual satisfaction, and benefit. Furthermore, Grupo SATEC, in its commitment to sustainability, wants to progressively promote the principles and requirements of social responsibility in its supplier companies, aspiring that both they and the subcontracted companies share the principles described in this Code of Conduct for companies, 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, know, and comply with the standards of this Code of Conduct.

This Code of Conduct for Supplier Companies includes the ethical principles and standards of conduct that our supplier companies or subcontractors must maintain for the proper development of their activity and is applicable to all supplier or subcontractor companies of Grupo SATEC.

## 2\_ Application regulations

Supplier companies of Grupo SATEC will guarantee in all their actions and, in turn, in their relationships with their main contractors and their supplier companies, strict compliance with current national legislation and any other that may be applicable in each workplace in who 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 respect and compliance, by both parties, with the conditions established in the contract and will adopt 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 ILO Fundamental Conventions and the United Nations Universal Declaration of Human Rights, 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 people's will or required of a person under the threat of any negative consequences if they do not provide it.

Workers will be free to leave employment with reasonable advance notice.

### **3.2. Child labor**

Supplier companies will guarantee the absence of child labor, not using, in any phase of their activities, the labor of people who have not reached the minimum age legally established in each country to access work and which must never be lower 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, always ensuring 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 considered in matters of selection, training, remuneration, promotion, or termination of contracts.

Likewise, human rights will be respected, and no employee will be subject to physical, sexual or gender-based, 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 and will be remunerated, at a minimum, in accordance with the legal regulations in force in each country, and who will be guaranteed the right to rest, remuneration for overtime, protection of maternity and work 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 rules applicable in each case.

### **3.6. Health, safety and occupational hygiene**

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

## 4\_ Environmental aspects

Grupo SATEC is committed to protecting the environment and expects from its supplier companies correct environmental management, respecting the environmental laws and regulations that are applicable in each case, and promoting environmental protection by trying to reduce, to the extent 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 positively value, with respect to supplier companies, having certification in environmental matters.



## 5\_ Business ethics

Grupo SATEC has implemented an anti-corruption policy of zero tolerance regarding offering or accepting bribes, or committing bribery, regardless of local laws or customs and considers integrity and trust essential requirements for the maintenance of its business relationships, which will be presided over by the highest standards of business ethics and regulatory compliance on this matter, particularly regarding:

### 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, Grupo SATEC supplier companies 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 Grupo SATEC companies 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, remuneration or any other offer that could condition the objectivity and independence of the contracting process, understanding that the objectivity and independence of the decision is compromised. of contracting when said offers are considered disproportionate in relation to good practices and customs in the commercial relationship, and if these offers or gifts had not been involved, the contract would not have been achieved.

### 5.2. Conflicts of interest

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

### 5.3. Fair competition

Grupo SATEC supplier companies will run their companies in a manner consistent with fair competition and respect for market standards and always in accordance with current applicable regulations.

### 5.4. Confidentiality of Information and intellectual property

Grupo SATEC is committed to information security 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 measures to protect the information and guarantee the confidentiality of the information entrusted to it by Grupo SATEC in the development of its commercial relations, unless Grupo SATEC has previously and expressly authorized its dissemination.

## 6\_ Non-compliance

Non-compliance, by the supplier company, 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 urging the termination of the contract that unites both parties, without prejudice to other legal or administrative actions that may be applicable.

## 7\_ Acceptance and accession

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, adherence, and commitment to compliance with it.

(Signature and stamp)

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