

CALVERA GROUP SUPPLIER CODE OF CONDUCT

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1. PURPOSE

The Supplier Code of Conduct includes the minimum ethical, social and environmental requirements that every supplier must accept and comply with in order to collaborate with the CALVERA Group, assuming also the commitment to extend it to its own supply chain.

The CALVERA Group Supplier Code of Conduct is aligned with the CALVERA Group Code of Conduct and together they guide the way in which our supply chain partners play an active role in achieving our objectives.

2. SCOPE

CALVERA Group requires that all its directors, executives and employees, along with all those who work on behalf of CALVERA Group, comply with the laws and regulations in force and act with integrity and ethics on all occasions.

Our intention, as part of the supply chain, is to work with companies that understand and share our commitment to the principles outlined in this Code.

Working together, we will build a sustainable business relationship that will allow us to successfully advance towards the achievement of our objectives.

We ask our supply chain partners to adhere to these principles and to pass them on to their supply chain.

3. SUPPLIER GUIDING PRINCIPLES

3.1 In relation to Safety, Health of workers and the environment.

The supplier shall promote the CALVERA Group's criteria of respect and environmental responsibility and, in particular, shall expressly respect the following principles:

- Comply with applicable safety, health, occupational risk prevention and environmental regulations, in order to ensure responsible behavior with the environment.
- Prevent or minimize, when unavoidable, any negative impact on the environment or on the community in its operations.
- To create and maintain a safe and healthy work environment for its employees, providing training, work procedures and appropriate protective measures for its workers.
- Establish and maintain a continuous improvement management program for risk prevention, safety, health and environmental incidents.
- Have preventive measures in place to avoid or minimize pollution, with special consideration to greenhouse gas emissions and environmental degradation.
- Apply environmental criteria in the contracting and monitoring of suppliers, extending these good practices to its own supply chain.

3.2 In relation to Ethics and Legal Requirements

Our suppliers shall:

- Inform, as soon as they become aware, of the existence of any relationship with employees, directors or managers of the CALVERA Group that may involve a conflict of interest.
- Comply with and enforce compliance with applicable regulations regarding the prevention of corruption and, in addition, implement policies and procedures to prevent corruption, bribery and facilitation payments.
- Promote anti-corruption vigilance within its scope of action to prevent and detect activities such as fraud, money laundering or missappropriation.
- Protect CALVERA Group's confidential information and personal data, preventing them from being distributed without express authorization, stolen or damaged.
- Implement the necessary information security measures to ensure that both digital and hard copy information is adequately protected according to its security risk level.

- To guarantee at all times the right to the protection of personal data of its employees and its stakeholders, protecting and making appropriate use of the same and respecting in all cases the applicable legislation on data protection.
- Inform CALVERA Group immediately of the existence of any security breach in the protection of personal data, in accordance with the provisions of the regulations on data protection that is locally applicable.

Our suppliers shall NOT:

- Establish any relationship with employees, executives or directors of CALVERA Group, whether financial or of any other nature, which could imply that such relationship conflicts with the interests of CALVERA Group.
- Offer any incentive to employees, executives or directors of the CALVERA Group, including their relatives or friends (related parties), in order to obtain or influence in a business of the CALVERA Group.

3.3 In relation to human and labor rights

All CALVERA Group suppliers shall respect the principles of the Universal Declaration of Human Rights and the conventions that develop it, as well as the recommendations of the International Labor Organization with respect to the rights of workers in the performance of their activities. In particular, the supplier shall promote and respect, among others, the following principles:

- Ensure the non-existence of all forms of child labor. Comply with all international, national and local laws, regulations and declarations regarding minimum working age.
- Guarantee the non-existence of any type of forced or compulsory labor.
- Not to subject its employees to any kind of physical or verbal abuse or any other form of intimidation.
- Integrate equal opportunity and non-discrimination criteria, carrying out selection, promotion, access to training and any other people management practice based on professional merit and objective assessments.
- Not to allow any type of discrimination associated with ethnic or cultural origin, sex, gender identity, sexual choice, disability, nationality, religion, age, social origin or ideology, among others.
- Respect the maximum working hours, as well as the minimum wages established by law and by the international agreements applicable in the aforementioned area.
- To ensure that its employees carry out their activities in a safe and healthy workplace and in compliance with applicable legislation and international conventions on occupational safety, hygiene and health.

- The supplier must encourage the adoption of preventive measures that minimize the risk associated with the development of its activity, as well as train its employees in health, safety and welfare at work, so as to ensure their safety and that of those people in their environment that could be affected during the development of the activity.
- Respect and promote human rights, with special attention to the freedoms and rights of vulnerable groups such as indigenous communities, women, children and ethnic minorities, among others, and promote the extension of this respect to suppliers and other stakeholders.
- Guarantee the freedom of association and collective bargaining rights of its professionals, without any type of sanction.
- Establish training, dissemination and awareness measures so that its managers and employees know, assume and comply with the Supplier Code of Conduct of the CALVERA Network Group.

3.4 In its relationship with CALVERA Group

All suppliers shall carry out their activities in compliance with the applicable legislation and international conventions, as well as with the commitments derived from the commercial relations they maintain with the CALVERA Group. Likewise, they shall base their performance on the quality of the goods and services they provide.

The supplier shall conduct its business with integrity, in express compliance with the following principles:

- Respect at all times the applicable regulations, developing its activity in accordance with the values and principles of the CALVERA Group in its relationship with its competitors and other parties involved in the market.
- To know its own suppliers, performing the due diligence to ensure the reputation of the CALVERA Group and the integrity of the supply chain.
- Maintain a behavior in accordance with the principles of action contained in this Code in all its business operations for the CALVERA Group.
- Not to engage in irregular commercial practices, including those involving price manipulation or others that go against free competition.
- Not to unduly influence their commercial, or professional relationships with the CALVERA Group and other entities, whether public or private.
- Encourage commitment to responsible procurement in their sourcing processes.
- To take the utmost care in preserving the image and reputation of the CALVERA Group, avoiding any inappropriate and incorrect use of the same, by its employees and its subcontracted companies.
- Establish mechanisms to ensure objectivity and transparency in the development of its activities and comply with all international, national and/or local corporate transparency regulations.

3.5 Compliance

CALVERA Group reserves the right to monitor its suppliers' compliance with this Code of Conduct.

In the event that a breach is identified, depending on its seriousness, this may lead to the termination of the contract or order and the review of its classification as a supplier of the CALVERA Group.

Our suppliers shall:

- Comply with the strictest standards, whether provided by law or applicable regulations or those established herein, in the provision of goods or services to the CALVERA Group.
- Implement systems and controls to ensure compliance with applicable laws and regulations and the principles set forth in this Code, including internal policies, training and auditing mechanisms aimed at improving such management systems.
- Apply these or similar principles to its own supply chain.
- Immediately notify CALVERA Group of any breach of the law or of the principles set forth in this Code.

Note: This CALVERA Group Supplier Code of Conduct contains general requirements applicable to suppliers of goods and services of CALVERA Group. Contracts or particular orders for goods or services may contain more specific provisions relating to these matters. In any case, if there is a contradiction or inconsistency between the provisions of this Code and any other provision contained in a particular contract or order, suppliers shall comply with the more restrictive provision.

Grupo Calvera has an Ethical Channel (canal-etico@calvera.es) available to its suppliers and partners to facilitate the communication of violations of this Supplier Code of Conduct or any other violation that may affect employees, managers or partners of Grupo Calvera.