



BUSINESS PARTNER CONDUCT POLICY

VALUES THAT REFLECT OUR CORPORATE CULTURE





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1. Purpose

At Aldesa we know that the proclamation of our principles and values set out in our Code of Ethics is not something that should remain behind closed doors. We are firmly convinced that bringing Aldesa's corporate culture closer to our stakeholders, especially our business partners, is a natural consequence of this culture.

Thus, in relations with third parties, Aldesa seeks to relate to those who share and reinforce the internal culture of the company.

The purpose of this policy is, as could not be otherwise, to transmit in a transparent and clear manner, the behaviour that should govern between Aldesa and its Business Partners in the commercial relations in which they operate, in which honesty, professionalism and good practice are paramount.

2. Scope

This policy shall be applicable to all those business partners with whom Aldesa has dealings in the exercise of its activities.

For these purposes, the following are considered:

- **Aldesa:** Aldesa Group, S.A., and any of its subsidiaries, regardless of their line of business or geographical location.
- **Business Partner:** third parties outside the organisation, whether public or private, with which Aldesa establishes some kind of commercial relationship. By way of example, this definition includes: clients; partners in joint ventures, consortiums, UTES, or any other type of similar business alliance; suppliers of both materials and services; subcontractors; and in general, all those who, through the business relationship, may expose the organisation to some type of risk of non-compliance with legislation, Aldesa's Code of Ethics or any of its internal policies.

However, the scope of this policy is limited to those Business Partners who, due to their internal or sectorial regulations, have codes of ethics or conduct similar to this policy and Aldesa's Code of Ethics; or who otherwise accredit that they follow the principles and values of this organisation, and this is accepted by Aldesa; or who are bodies or entities of the Public Administration which have their own regulation in this matter.

3. Pautas de conducta

- a. Basic behavioural obligations in commercial relations with Aldesa.

In all relations with Aldesa, the following must prevail:

- Integrity, honesty, ethics and efficiency in the fulfilment of the obligations contracted with Aldesa.
- And the commitment to comply with the values and principles established in Aldesa's Code of Ethics.

- b. General conduct guidelines for all Aldesa Business Partners.

And to comply with these obligations, the Business Partners accept and share the principles and values established in the Aldesa Code of Ethics and its basic principles, which they will follow in all their actions and decisions that affect relationships with Aldesa:

- Respect for legality
- Ethical integrity in the business relationship
- Respect and compliance with the Universal Declaration of Human Rights (<https://www.un.org/es/universal-declaration-human-rights/>)

The following general guidelines of conduct should be followed:





Comply with current regulations

- Ensure that the actions, activities and decisions carried out by its members comply with current regulations and with the obligations undertaken with Aldesa
- To act diligently in monitoring and supervising compliance with this policy.
- Comply with Aldesa’s Compliance Policy.

Precedence of good faith in the business relationship

- Conduct business relations with good faith, objectivity and professionalism
- Seek solutions that favour the principle of continuity of the contractual relationship, and that allow for a common benefit in the business relationship.
- Not tolerate bad faith behaviour that may damage Aldesa’s reputation in the eyes of third parties.

Promote good understanding in relations with Aldesa

- Safeguard the interests of all agents and parties involved in the business relationship
- Work and collaborate for safe working environments, in which respect for diversity and non discrimination are paramount.
- Not tolerate conduct that may put the health and safety of workers at risk, or that may violate workers’ labour rights.

Ensure transparency and accuracy of information

- Take control measures to ensure that the information transmitted to Aldesa is truthful, necessary and complete
- Not to tolerate manipulations, falsifications or alterations of any kind in the information that is transmitted to Aldesa.

Adequate protection of confidential information and privacy of personal data

- To avoid the improper use of Aldesa’s confidential information by members of its organisation
- To take protective measures and protect the privacy of personal data that may be processed as a result of the business relationship.

Preventing situations that may involve a conflict of interest

- Avoid and report situations that may involve a conflict of interest with any member of Aldesa
- Take control measures to prevent the intervention of its members who may have a possible conflict of interest with Aldesa, both directly and indirectly.
- Comply with Aldesa’s Conflict of Interest Management Policy.

<p>Zero tolerance for corruption</p>	<ul style="list-style-type: none"> • Take the necessary internal measures to prevent or detect acts or tolerance of its members that may be understood as corruption, fraud or influence peddling • Communicate to Aldesa any fact, procedure or failure that involves an act of corruption, fraud or influence peddling in the business relationships contracted or that may pose a risk to Aldesa in both legal and reputational terms • Comply with Aldesa's Anti Corruption Policy
<p>Zero tolerance for money laundering</p>	<ul style="list-style-type: none"> • Take the necessary internal measures to prevent illicit payments from occurring • Comply with accounting and financial obligations in accordance with the applicable regulations.
<p>Respect freedom of competition in the marketplace</p>	<ul style="list-style-type: none"> • Take internal measures to ensure that the members of the organisation do not enter into agreements that may infringe on the freedom of competition and markets
<p>Contributing to social engagement</p>	<ul style="list-style-type: none"> • Maintain a commitment to collaborate with communities that may be affected by the business relationship, with the aim of improving the development of disadvantaged communities • Be up to date with its tax obligations.
<p>Respecting the environment</p>	<ul style="list-style-type: none"> • Ensure compliance with environmental prevention regulations • To take the necessary protective measures to prevent events that could cause damage to nature and the environment, especially in those areas that require greater protection.
<p>Zero tolerance for child exploitation and forced labour</p>	<ul style="list-style-type: none"> • Ensuring compliance with labour laws and workers' rights.



c. Specific guidelines for the conduct of Aldesa's customers:

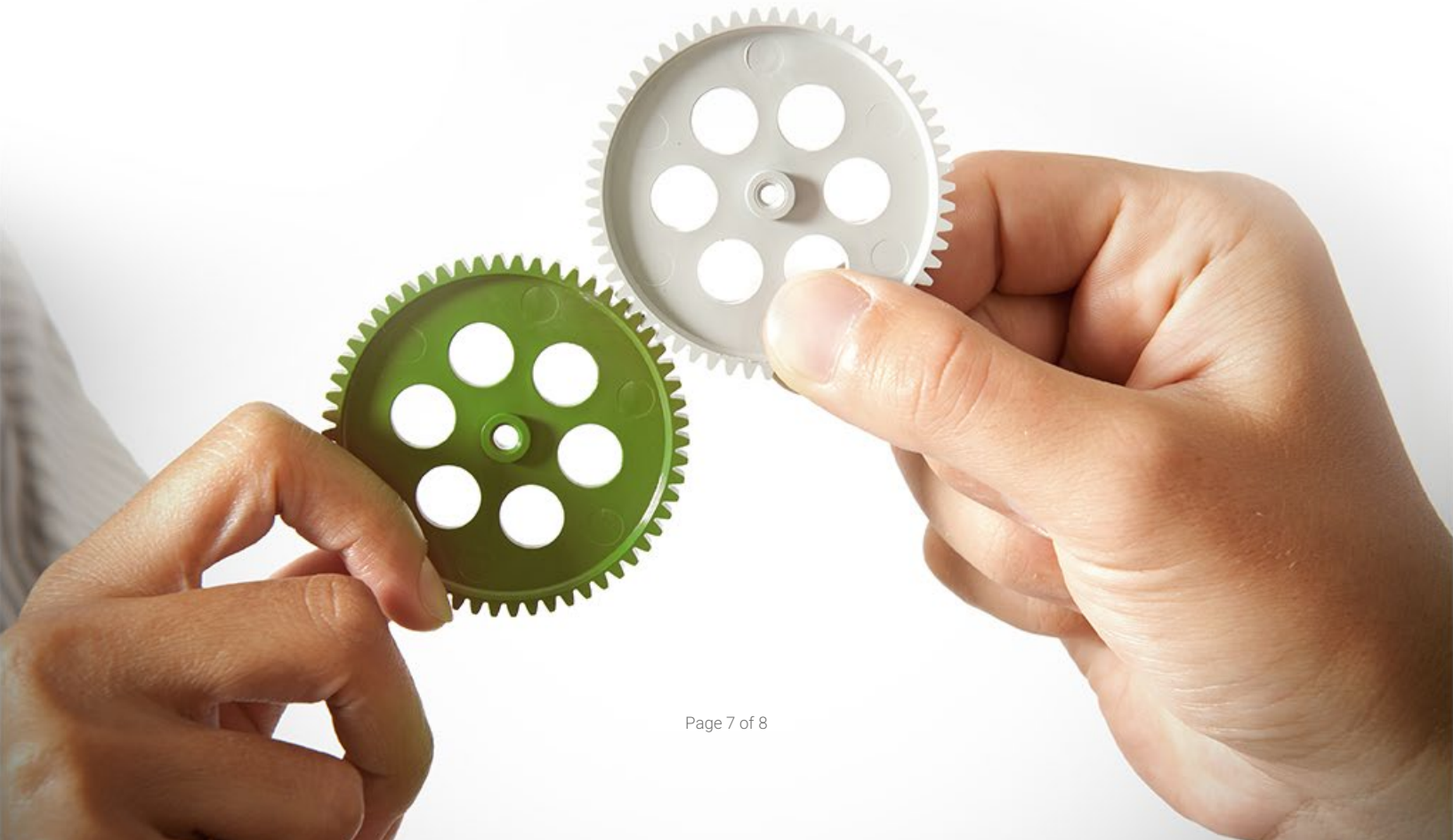
- Aldesa's customers shall reject any benefit or advantage intended to unduly influence the contracting or decision-making processes.
- They shall ensure the lawful origin of the funds used for the fulfilment of their contractual obligations.

d. Specific guidelines for the conduct of Aldesa's associates and partners:

- Collaborate for the proper control of the business relationship, establishing complete, regular, accurate and transparent reporting measures between partners.
- Favour and collaborate in the implementation of control measures, and the carrying out of investigations or internal audits by Aldesa that allow the prevention and detection of breaches of regulations or of this policy by the partner in the business relationship.
- All relationships contracted by Aldesa shall be established on objective grounds, and agreements that involve acts of collusion or market sharing shall not be allowed

e. Specific guidelines for the conduct of Aldesa's suppliers and subcontractors:

- Aldesa's suppliers and subcontractors shall ensure that they carry out their activities based on criteria of quality, timeliness and cost, complying with Aldesa's internal procedures for approval and contracting.
- They shall strictly ensure compliance in terms of health and safety prevention for workers, with the aim of minimising occupational risks as far as possible in the development of the business relationship.
- Ensure that the products and services supplied to our Customers are safe, reliable and comply with applicable specifications, standards, legislation and codes.
- Take due diligence when employing personnel or third parties, ensuring compliance with labour regulations, and protecting workers' rights.
- They shall ensure that the assets, resources and means provided by Aldesa are used correctly, and for the development of the assigned tasks or functions, taking the appropriate protection and conservation measures.



4. **Action** to be **taken** in the **event** of **incidents** of **non-compliance** with this **policy**

Aldesa's Business Partners shall ensure compliance with this policy, undertaking to take the necessary corrective and disciplinary measures in the event of non-compliance by any of its members.

To this end, they will provide communication channels through which their members can report any breach of this policy.

Thus, in the event of suspicion or certainty of conduct contrary to the law, Aldesa's Code of Ethics or this Policy in the exercise of the commercial relations contracted with this organisation, they must notify the Aldesa Group's Compliance Committee through its ethics mailbox: etica@aldesa.es

In the event that any Business Partner or any of its members have doubts or queries about the correct application and understanding of the Code of Ethics and this Policy, they may use the same means.

The personal data you provide will be included in a file under the responsibility of the Aldesa Group with registered address at C/ Bahía de Pollensa, 13, 28042 Madrid, for the purpose of managing your notification, carrying out the investigation of the reported facts, adopting the relevant corrective measures, and if necessary, informing you of the outcome of the procedure.

Your data will be treated confidentially and will not be communicated to any third party, unless it is essential for the investigation of the reported facts. In any case, in compliance with data protection legislation, you may exercise your rights through the following email address: arcopol@aldesa.es, providing a copy of your ID card or equivalent document, and identifying yourself as a user of the Internal Complaint service.

The personal data provided by third parties in the communications of the ethical channel or in the course of the investigations will be treated confidentially and will not be communicated to any third party, except to authorised personnel in the development of the investigation file.

In any case, in compliance with data protection legislation, the affected persons may exercise their rights by sending an email to: arcopol@aldesa.es, providing a copy of their ID card or equivalent document, and identifying themselves as a user of the internal Whistleblowing service.

Management Board of Grupo Aldesa

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Regulation code: POL-CUMP-06

Review version: Rev. 00

Date: 25/03/2021