

# SUPPLIER CODE OF CONDUCT

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# 1. INTRODUCTION

EIKA is aiming to ensure that its own conduct and that of its members is in accordance with the applicable legislation and ethical principles set out in its Code of Conduct. Our goal is to build a responsible business model that ensures the creation of long-term sustainable economic value, with regard to the various stakeholders in our organisation.

We acknowledge that our suppliers, both direct and indirect, are key players in our value chain and play a vital role in achieving our goals and developing our policies and strategies. Therefore,

we encourage and expect our suppliers to adopt responsible practices in terms of ethics and integrity, transparency, safety and health, environmental responsibility and respect for human rights. This implies complying with applicable national and international laws at all times.



## 2. OVERVIEW

This Supplier Code of Conduct sets out the ethical principles and minimum expectations of conduct that are mandatory for all direct and indirect suppliers involved in the different supply chains of EIKA.

Our suppliers are responsible for familiarising themselves with and complying with the content of the Supplier Code of Conduct and the ethical principles contained therein.

Direct Suppliers should transfer the obligations in this Supplier Code of Conduct to their respective supply chains.



## 3. SCOPE OF APPLICATION AND DUTY OF COMPLIANCE

The Supplier Code of Conduct applies to both direct and indirect suppliers of EIKA, regardless of the provider's business sector, geographic location or activity. Direct suppliers of EIKA have a duty to implement the requirements and guidelines stipulated in this Supplier Code of Conduct throughout their own supply chains.

We require our suppliers to be familiar with and comply with all applicable laws and regulations, as well as the contractual terms agreed with EIKA. It is also essential that they obtain all permits, licences and records required by law, keeping them up to date and available for inspection upon request.

## 4. WORKING CONDITIONS AND HUMAN RIGHTS

### 4.1 Health and safety at work

The health and safety of workers are essential points for EIKA. Therefore, all suppliers must comply with all of the laws, regulations and standards applicable to them wherever they carry out their business activities, ensuring a safe and healthy working environment for the workers in the organisation.

This involves the use of appropriate designs, occupational safety procedures and preventive maintenance, as well as the provision of personal protective equipment when necessary.

They must also provide safety information in order to train and protect employees against occupational hazards, both at their own facilities as well as ensuring that those working at the EIKA facilities comply with the applicable health

and safety procedures and the applicable regulations as regards coordination of business activities.

Suppliers should also provide the necessary information to ensure that EIKA can protect its workers and the environment (for example, by providing safety data sheets and information on the use of hazardous substances).

EIKA recommends that its suppliers establish a suitable health and safety management system (ISO 45001 or equivalent).



## 4.2 Working Conditions

All suppliers must comply with the laws and regulations applicable to them in the following areas:

- **Recruitment in accordance with the existing legislation:** Anybody contracted by an Eika supplier must be contracted in accordance with the applicable law, and a written contract (or valid document) must be provided.
- **Working hours and overtime:** The working hours and work schedule of employees must not in any case exceed the legal limit.
- **Permits:** Permits must be obtained in accordance with the applicable legislation in each country.

- **Wages and benefits:** The minimum wages and benefits set by law and collective agreements must be met. Clear and comprehensive information on terms and conditions of employment, including benefits, will be provided in a format and language that is accessible to employees.
- **Freedom of association:** Suppliers must respect the workers' right to freedom of association and collective bargaining.

### 4.3 Slavery and child labour

Suppliers are prohibited from engaging in any kind of forced labour. This includes forced prison labour, bonded labour or any other form of servitude.

All forms of child labour are strictly prohibited. Unless local legislation provides for a higher

age limit, no minor may be employed without having completed compulsory education or anybody under the age of 16 (except as otherwise provided by ILO Convention No. 138). Workers under the age of 18 must not carry out hazardous tasks and may be exempted from night work in view of their educational requirements.



### 4.4 Equal opportunities and non-discrimination or harassment

Suppliers must not discriminate against their employees on the basis of skin colour, race, nationality, social background, disability, sexual orientation, political or religious beliefs, gender or age. In any employment decision, employees are to be considered strictly according to their disabilities and qualifications, including, but not limited to, recruitment, promotion, compensation, benefits, training, dismissals and termination of contract.

The dignity, privacy and personal rights of each individual must be respected. Nobody employed by the suppliers is to be subjected to corporal punishment or verbal, psychological, sexual or physical harassment, not to mention any other kind of abuse.





## 5. ENVIRONMENT

EIKA recommends that its suppliers establish a reasonable and adequate environmental management system focused on continuous improvement (ISO 14001 or equivalent), including policies and procedures to manage their environmental system effectively.

### 5.1 Pollution

As a general rule, suppliers should prevent and minimise any pollution of air, water, soil, biodiversity, land use and prevention of deforestation, as well as noise pollution or other types of pollution which may have adverse effects on the environment and/or people.

### 5.2 Greenhouse gas (GHG) emissions, energy efficiency and climate change

To address the challenges of climate change and move towards a supply chain with net zero greenhouse gas (GHG) emissions, EIKA requires all its suppliers to manufacture products, processes and services while eliminating hazards, reducing risks and providing conditions for the prevention of environmental pollution. In turn, they must support the acquisition and design of products and services that impact energy performance.

They must develop an energy strategy aimed at efficiency and maximisation of renewable energy consumption.



They must develop a strategy for reducing water consumption at their facilities and/or in their own supply chains.

And they must develop a strategy for climate change mitigation and adaptation.

### 5.3 Substances of concern and chemicals

Suppliers must identify and declare hazardous substances, chemicals and materials, ensuring their safe movement, storage, processing, recycling, use and disposal. Suppliers will ensure compliance with all applicable laws and regulations for the control of materials and chemicals and restriction of use of materials and substances of concern, contaminants and/or prohibited substances (RoHS, REACH and CLP regulation, or TSCA in the United States, for example), providing the necessary information, documentation and certification, along with any other details which EIKA may require.

Suppliers must actively work to limit and restrict the number of chemicals with adverse impacts and select those with the lowest possible risk to health and the environment. Suppliers must conduct risk assessments and take steps to minimise any negative impact.

Suppliers will also ensure that employees are aware of, and have up-to-date special instructions and training on product safety practices and being prepared for emergencies.

Asimismo, los proveedores se asegurarán de que los empleados sean conscientes y cuenten con instrucciones y capacitación especial actualizada sobre las prácticas de seguridad de los productos y preparación para casos de emergencia.

### 5.4 Circular economy and waste management

Suppliers must consistently show responsibility and make efforts to reduce, reuse and recycle waste to foster opportunities for improvement and minimise waste throughout the product life cycle, building a sustainable circulation system.

### 5.5 Biodiversity and Ecosystems

EIKA urges suppliers to ensure the protection of the natural ecosystem, in particular the protection of endangered habitats, as well as the sustainable use of natural resources. Suppliers must strive to ensure that supply chains are free from deforestation and the degradation of biodiversity and ecosystems, in accordance with the applicable legislation.



## 6. RESPONSIBLE PROCUREMENT OF MINERALS AND MATERIALS

EIKA's Code of Conduct aims to comply with and enforce the fundamental principles of the Declaration of Human Rights, according to the definition of the UN (United Nations, 1948), in all areas of action of its supply chain.

The Eika Management considers the respect and satisfaction of PEOPLE along with respect and preservation of the environment to be a key objective.

We have strict guidelines for our activity and the Eika Code of Conduct requires each of us to act responsibly and maintain the highest standards of personal, business and legal conduct.

Eika requires its suppliers to provide safe, legal and humane conditions for their workers in

accordance with applicable local laws.

Eika's suppliers must support the goal of putting an end to environmental devastation in the Countries Covered.

By selecting suppliers, Eika aims to do business with reputable business partners who are committed to ethical standards and business practices consistent with those of Eika. Consistent with the above, our suppliers commit to supporting EIKA in its efforts to identify, prevent and mitigate risks associated with conflict minerals, as well as other materials at risk of contributing to human rights violations, climate change or deforestation. To this end, suppliers will work with EIKA:

- Providing any information requested on the supply chain, operations, products and their characteristics (for example, identification of supply chain members, emissions data, etc.).
- Participating in and supporting the development of actions aimed at preventing and mitigating adverse impacts, complying with applicable legal requirements, as a minimum. Suppliers commit to demanding a similar commitment throughout their respective supply chains, encouraging the implementation of the measures adopted.

All suppliers will be required to meet the following requirements for Corporate Social Responsibility and Compliance.

### **Laws and regulations**

In August 2012, as required by section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, the United States Securities and Exchange Commission (SEC) approved the final

standard ("Conflict Minerals Standard") on the disclosure of conflict minerals. This standard requires publicly-listed companies subject to SEC regulation to provide an annual report on the presence of conflict minerals (tantalum, tin, tungsten and gold) which are necessary for the functionality or production of the products they manufacture or contract to manufacture.

Eika requires suppliers to comply with all applicable laws and regulations, as well as the principles set out in the Code.

Eika requires all suppliers to provide full conflict mineral declarations using the EICC/GeSI conflict mineral report template.

## **7. ANTI-CORRUPTION POLICY**

Suppliers will not engage in any form of corruption or bribery, whether active or passive. It is forbidden to offer and/or accept from third parties, directly or indirectly, any gift, favour or compensation in cash or in kind, that due to its value may be interpreted as a gift exceeding courtesy and carried out for the purpose of obtaining unlawfully favourable treatment for the supplier.

Suppliers will strictly comply with the national and international laws related to money laundering and the financing of terrorism applicable to them. They must also cooperate, when required, with the authorities responsible for combating said practices.

Suppliers must also conduct their business in an open and transparent manner, avoiding any conflicts of interest that may interfere with objective and professional decision-making.

In terms of import and export activities, suppliers are to ensure compliance with all import and export rules for goods, services and information imposed by applicable law as well as external regulations imposed by other operators.

It is strictly forbidden to conduct business with people or companies listed on the official sanctions lists of the respective countries, regardless of the delivery process. Actions that may be related to smuggling are expressly prohibited.

Suppliers must avoid any conduct which may constitute abuse or unlawful restraint of competition, among others, participation in price fixing, market or customer allocation, the sharing of markets or the manipulation of tenders with competition.





## 8. MANAGEMENT OF INFORMATION AND COMPANY PROTECTION

### 8.1 Confidentiality, personal data protection and privacy

Suppliers are to take appropriate measures to ensure compliance with the laws, applicable regulations and rules on privacy and protection of personal data and will respect and preserve the integrity and confidentiality of any information they receive as a result of their relationship with EIKA. To this end, suppliers will take adequate security measures to protect against misuse, improper management, counterfeiting, theft or improper disclosure. Under no circumstances must personal data be processed for purposes other than those legally or contractually provided, without their content being disclosed to third parties, unless express

authorisation is given by the Person themselves, EIKA or its Client, competent in each case, or there is a legal or judicial requirement.

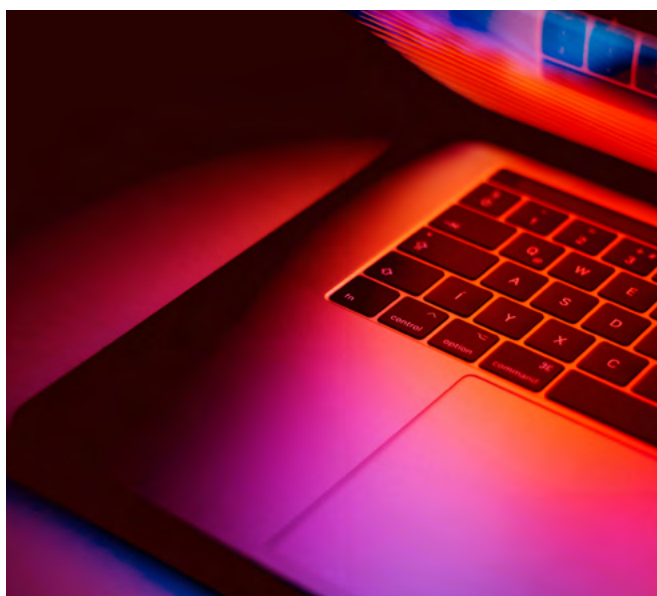
### 8.2 Cybersecurity

Additionally, EIKA requires its suppliers to be committed to information security and cybersecurity, ensuring data protection through appropriate physical and electronic security procedures. EIKA recommends its suppliers establish an information security management system and cybersecurity guidelines (ISO 27000 or equivalent), including monitoring policies and processes, in order to protect the information against breaches, cyber-attacks or cyber incidents.

### 8.3 Protection of intellectual and industrial property

Suppliers must comply with the laws and regulations concerning intellectual property rights. The use of products, software, systems and know-how will be carried out in accordance with the relevant regulations.

Suppliers must also implement effective methods to eliminate the risk of introducing counterfeit parts and materials into the products they supply.



## 9. MANAGEMENT AND DUE DILIGENCE SYSTEM

Due diligence refers to the ongoing risk management process to identify, prevent, mitigate and justify potential impacts on the climate, resources and people arising from business activities.

EIKA is committed to building ethical and responsible supply chains, and will positively assess progress by suppliers in establishing and maintaining appropriate management systems to ensure compliance with the points set out in this Supplier Code of Conduct, especially the

implementation of due diligence processes aimed at reducing impacts and risks to people and the environment along the different stages of the supply chain, adapting them to the size and circumstances of the company; and using international standards such as the OECD Due Diligence Guidance for Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights as a reference.



## 10. EIKA COMMUNICATION CHANNEL

Anyone who becomes aware of a breach should report it directly through Eika Communication Channel.

Anyone with evidence or suspicions that a crime has been committed, or that any of the principles and values contained in the Code of Conduct and Eika's supplier policies have been violated, must report this in the following ways:

- Using the following email address: [kanaletikoa@eika.es](mailto:kanaletikoa@eika.es), or
- by post to the attention of the Compliance Committee, at Eika S.Coop., Urresolo 47, E-48277 Etxebarria (Bizkaia) – (Spain)

The Eika Compliance Committee will ensure the confidentiality of the reporting person.

Eika will also ensure that no retaliation or discrimination of any kind will fall upon the reporting person, both during and after the process. Failure to comply with the above will be considered a breach of the Code of Conduct. In turn, suppliers must have their own Communication Channels in accordance with Law 2/2023.



# 11. SUPPLIER RESPONSIBILITY

The commitment of suppliers to the principles of the EIKA Supplier Code of Conduct is essential to maintain an ethical and sustainable business relationship. By applying this Code, suppliers ensure that their own practices and policies are aligned with established standards, and commit to maintaining a high level of integrity in all their operations related to EIKA.

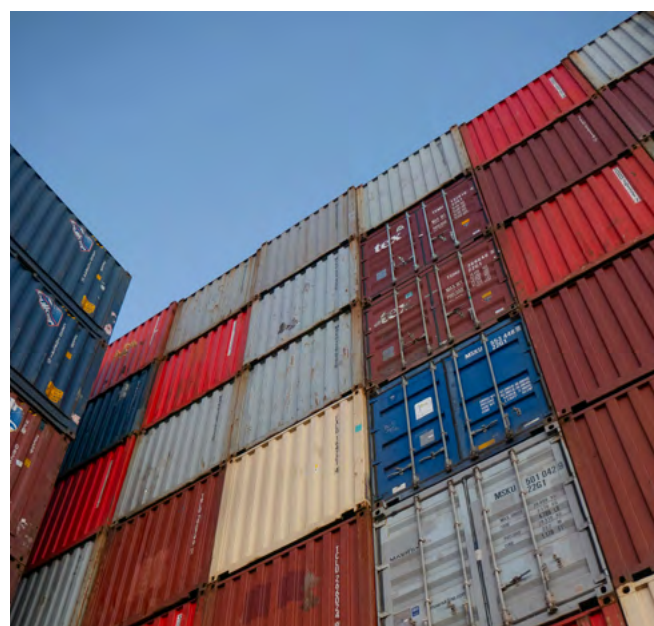
Adherence to the EIKA Supplier Code of Conduct is an essential requirement during the EIKA supplier selection process. By signing this Code, suppliers accept that these principles apply to all existing and future business relationships with EIKA. It is a binding commitment that implies respecting the minimum good practice standards established by EIKA and abiding by all applicable laws and regulations.

EIKA reserves the right to monitor the implementation and continued compliance of its suppliers with this Code of Conduct. Said verification may be carried out through self-assessment questionnaires, audits of suppliers' facilities and activities or other monitoring

mechanisms. In addition, suppliers must keep appropriate documents and records to ensure compliance with regulations.

Failure by suppliers to comply with the provisions of this Supplier Code of Conduct may have consequences for their contractual relationship with EIKA and the companies to which it has provided its services, with them reserving the right to terminate the contract with any Supplier that fails to comply with the provisions of this Supplier Code of Conduct, without prejudice to any other applicable legal or administrative action.

Open and honest communication between EIKA and suppliers is encouraged in order to address any non-compliance in a transparent and effective manner, therefore ensuring a strong and ethical business relationship.



# Supplier's Declaration

**We hereby declare the following**

1. We have received a copy of the "EIKA Code of Conduct for Suppliers and Third Party Intermediaries with EIKA" (hereinafter the "Code of Conduct") and we undertake to comply, in addition to the commitments set out in the procurement contracts negotiated with EIKA, with its principles and requirements.
2. We acknowledge that this declaration is subject to Spanish substantive law, without reference to any of its conflict-of-law rules.

This document must be signed by a representative of the company.

Company name:

Registered address:

Position:

Signature:



## HEADQUARTERS

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## MANUFACTURING PLANTS

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