

# CODE OF CONDUCT FOR SUPPLIERS AND PARTNERS OF THE AENOR GROUP

Corporación Confidere and the companies in its group (hereinafter, "AENOR") contribute to the transformation of society by building trust among economic agents on the basis of knowledge, values and competitiveness, applying good practices in all areas of their activity.

AENOR is firmly committed to compliance with the law and, based on this commitment, has integrated a risk management system into its activities to detect and prevent criminal behaviour or corrupt practices. Reinforcing this commitment, AENOR is a signatory to the United Nations Global Compact, carrying out its activities within the framework of the 10 universally accepted principles relating to human rights, labour rights, the environment and the fight against corruption, having integrated these principles as fundamental values in the development of its activity.

The aim of this code of conduct for AENOR suppliers and collaborators is to align the business strategy with the implementation of environmental, social and governance criteria, formalising the minimum requirements that we expect all suppliers and collaborators to assume and report on in our relationships.

AENOR's relationship with its suppliers and collaborators is a key component in achieving our objectives and maintaining our commitment to being an ethical and responsible organisation. In addition, AENOR reserves the right to request information to support its obligations related to the maintenance, supervision and reporting on its third parties.

Suppliers and collaborators must keep the documentation that is reasonably necessary to demonstrate their compliance with this Code. AENOR also reserves the right to conduct audits on the requirements of this Code at the locations where services are provided to AENOR, as appropriate and permitted by law, or in accordance with the contractual conditions.

This Code should be read in conjunction with the clauses governing the legal relationship between the supplier and collaborator and AENOR (general conditions, contracts, etc.).

The Supplier or Collaborator hereby declares that they understand and accept the following principles:

## 1. Ethics and Integrity

Corruption: any form of active or passive corruption is prohibited, regardless of whether it affects public officials or occurs in other commercial operations, including not carrying out activities and/or business in countries or with persons and/or companies sanctioned for money laundering and terrorist financing or included in any of the national and international restrictive lists.

Our suppliers and collaborators must not promise, offer or grant any unjustified financial or other benefit in order to obtain or secure, either directly or through an intermediary, favourable treatment, a commercial, financial or other advantage, or to obtain or retain a contract or obtain any other irregular benefit in the course of their economic activities. They must also take all necessary measures to prevent bribery in all its forms and use their best efforts to combat corruption.

suppliers We expect our and collaborators to comply with the antibribery and anti-corruption regulations applicable in the countries where they operate, including Organic Law 10/1995 of 23 November of the Spanish Criminal Code and, in general, all international laws developed in the countries where AENOR operates to comply with the Organisation for Economic Co-operation Development Convention and Combating Bribery of Foreign Public Officials ("OECD Convention").

Permits, Licences and Insurance: the supplier and collaborator must ensure the validity and validity of the authorisations, licences, insurance and approvals necessary to carry out their

activities and, if necessary, provide AENOR with the related certificates and licences.

Gifts or Invitations: The supplier and collaborator undertake not to offer, directly or indirectly, any type of gift, favour or benefit to employees, managers, representatives or any other person related to AENOR who may influence or appear to influence commercial decisions. They shall be permitted provided that they are in accordance with local laws, reasonable, symbolic and do not contravene the provisions of the AENOR Code of Ethics. A culture of prevention and compliance based on the principle of "zero tolerance" towards bribery in business in its various forms shall be promoted.

In case of doubt or concern, please contact the AENOR Compliance Body at the following email address: canaletico@aenor.com

Fair competition: commitment to fair applicable competition and all regulations. Suppliers and collaborators must refrain from entering into restrictive agreements with any third party and from using market restriction practices. This includes, but is not limited to, legislation prohibiting anti-competitive such practices as price-fixing agreements, market sharing, bid rigging and abuse of a dominant position.

Conflict of interest: any situation involving a conflict of interest or inappropriate influence in commercial and professional relationships must be avoided. Suppliers and collaborators affected by a potential or actual conflict of interest in their activities in relation to AENOR must immediately notify

## **AENOR**

AENOR by email at canaletico@aenor.com

Security, confidentiality and IP: All types of intellectual property, both physical and digital, trade secrets, knowhow and other confidential or sensitive information shall be respected and protected, and the necessary technical and organisational measures shall be taken at all times to protect and ensure the security of confidential or sensitive information obtained as a result of the business relationship and to protect it from misuse. This information shall be used strictly for the purpose for which it was provided.

Data Protection: AENOR's suppliers and collaborators undertake to comply strictly with the applicable laws and regulations on privacy and personal data protection, with particular attention to the EU General Data Protection Regulation (GDPR; EU 2016/679) and Organic Law 3/2018 on Personal Data Protection and Guarantee of Digital Rights (LOPDGDD). In the performance of their operations involving the collection, storage, processing or disclosure of personal data, they undertake to:

- Provide clear and transparent information on the processing of personal data.
- Process only data that is necessary and for specific purposes.
- Respect the rights of data subjects.
- Train and raise awareness among their employees.
- Implementing appropriate measures to ensure the protection of personal data, preventing its loss and any security breaches.
- Avoid international data transfers as far as possible. If necessary, adequate safeguards will be in place to ensure their security.

- Notify any security breaches that may occur to datos@aenor.com
- Periodically assess compliance with the above.

Use of privileged information: suppliers and collaborators must not carry out operations, transactions or speculation with non-public and confidential privileged information obtained from their relations with AENOR.

Use of Artificial Intelligence (AI): suppliers and collaborators responsible for the governance, design, development, supervision performance of their AI systems, where applicable. When developing Al-based suppliers systems, shall prioritise human-centred approaches in their ensuring processes, that human oversight is included in the various phases of the development implementation of Al-based systems. Suppliers must establish AI governance frameworks that uphold honesty and impartiality and minimise intentional or unintentional misuse, unethical or biased results. inaccuracy and information security breaches, ensuring that their AI-based systems operate in a safe. legal, secure, auditable. transparent and explainable manner. The supplier's Al-based system and results must comply at all times with applicable laws and regulations, contractual obligations, and policies and guidelines, incorporating mechanisms that facilitate external demonstration of this compliance.

# **AENOR**



# 2. <u>Human and Labour</u> Rights

AENOR wishes to extend to its suppliers and collaborators its commitment to comply with the human rights recognised in national and international legislation, as well as with the principles on which the United Nations Global Compact, the United Nations Norms on Responsibilities of the Business Enterprises and Other **Business** Enterprises in the Sphere of Human the OECD Guidelines for Multinational Enterprises, the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the International Labour Organisation, and all documents or texts that may replace or supplement those mentioned above.

Suppliers and collaborators must not participate in or support human trafficking or slavery and must not use forced or involuntary labour, nor demand work or service from a person under threat or coercion. Suppliers must not use child labour for their benefit, nor must they hire underage workers, and they must respect freedom of association and collective bargaining.

Respect, equality and non-discrimination: the dignity, privacy and any other rights of their workers shall be respected, and no discrimination based on ethnic or cultural origin, sex, gender identity, sexual orientation, disability, nationality, religion, age, social origin or ideology, among others, shall be

permitted. Suppliers and collaborators must promote diversity in their organisation, whenever possible, through the inclusion of minority groups.

Health and safety: a healthy and safe working environment must be provided for employees, in compliance with workplace health and safety laws and regulations, with particular emphasis on Law 31/1995 on the Prevention of Occupational Risks.

#### 3. Environment

Our suppliers and partners must comply with the environmental laws and regulations applicable in the jurisdictions where they operate and undertake to adopt procedures that minimise the environmental impact of their activity, promoting the responsible consumption of basic resources to contribute to sustainable development on the planet. Suppliers and partners are expected to make efforts to eliminate or reduce the levels of waste (both solid and residual) generated and to make efficient use of natural resources such as water and energy.



# 4. AENOR Code of Ethics

AENOR has a Code of Ethics that sets out in greater detail the principles, values and guidelines for good corporate governance, enabling it to fulfil its mission, meet its commitments and achieve excellence in the management of the organisation. In addition to the provisions of this Code, all our suppliers and partners must comply with its

# **AENOR**

provisions in the course of their activities.

# 5. Responsibility and Management of Breaches of the Code.

The responsibilities of AENOR's suppliers and collaborators in relation to this Code are:

- To respect and comply with this Code while you remain a supplier or collaborator of AENOR.
- To be familiar with and comply with the regulations that apply to your activity.
- Specifically, AENOR's suppliers and collaborators undertake to provide all the information required by AENOR.

- d) To cooperate with investigations and audits, proactively providing all information requested by AENOR and related to the matter.
- e) Notify AENOR's Compliance Body in good faith of any alleged breach of the Code or any information it considers relevant, as well as any issue relating to regulatory compliance, through AENOR's Ethics Channel published on the AENOR corporate website.

If a breach is identified, corrective actions or recommendations may be proposed and, depending on its severity, may lead to the termination of the contract, agreement, purchase order or any partnership and the review of your classification as an AENOR supplier or collaborator.