

Supplier Code of Conduct Sener





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1. Introduction

Sener is aware that long-term success, both for the company and for society, relies on a collective commitment to respect for rights and business integrity. Because of this, we have established the promotion of sustainable and responsible management as one of our core guiding principles, and we aim to extend this philosophy throughout our supply chain.

At Sener, we understand that sustainability is not just a responsibility, but also an opportunity for society to grow. Which is why we are committed to promoting sustainable practices throughout our supply chain, which means working with our suppliers to ensure that they share our values and principles in terms of social and environmental responsibility.

It is against this backdrop that we have prepared this Sener Supplier Code of Conduct, which summarises the expected behaviours and mandatory standards for this group of stakeholders.

This Code is applicable to all suppliers¹ of Sener, its directors, professionals and the entities that comprise them, as well as future entities that may be in these situations or that are constituted with the participation of any of them.

The provisions of this Code shall apply without prejudice to the provisions of the current rules and regulations, and in the contracts with each supplier, which shall be applicable in all cases.

2. Sener's Purpose and Values

*At Sener, we have the purpose of transforming the world
by challenging the boundaries of technology*

We are here to leave the world better than we found it, creating a future with our suppliers that is based on our corporate values:

Innovation

Innovation is a core value across the entire Sener Group. We are spearheading technological change towards the sustainable development of society and the planet.

Excellence

We view excellence as the sum of innovation and efficiency. We provide value to our customers with our innovation, products and projects.

Comitment

We contribute socially through our projects and by helping to develop our people's talent.

¹ A supplier is any third party that delivers products, provides services or carries out work for any of the companies of the Sener Group. These include subcontractors, manufacturers and suppliers, defined in accordance with the internal regulations.

Passion

Passion is the inner strength that unites us with what we do, the desire to go further in each project and to contribute our very best, until we feel proud of our work.

Teamwork

Teamwork is an inherent element of our activity, which spans highly complex technical projects that require the work of many people who combine their knowledge and experience.

3. Guiding principles for suppliers

Since 2021, Sener has endorsed the United Nations Global Compact as part of its commitment to sustainable development and compliance with the UN's Ten Principles on human rights, labour standards, the environment and the fight against corruption.

For this reason, at Sener we expect all our suppliers to carry out their activity with the same values of ethics and integrity that characterise our activity, in full compliance with international legislation and standards in the different aspects of corporate activity.

Work and Human Rights

Suppliers must support and respect the protection of internationally proclaimed human rights; and ensure that, over the course of their business activity and relationships with third parties, they are not involved in human rights abuses or violations or any kind of treatment that violates human dignity.

Child labour

As evidence of our rejection of child labour at any stage of the supply chain, suppliers may only employ persons of the minimum legally established age to work in each jurisdiction. The supplier is required to verify this condition and comply with the applicable labour laws, including the conventions of the International Labour Organization.

Forced labour and human trafficking

The supplier must ensure that all its employees work voluntarily without any kind of coercion or threat of sanction, and prohibit any type of forced or compulsory work, as well as any form of human trafficking, slavery or bondage, ensuring respect for individual freedom throughout its supply chain.

Wages and working hours

Sener suppliers must pay their employees fair and competitive wages, in compliance with the applicable labour laws and international standards, and establish and respect limits on working hours and adequate rest spaces.

Non-discrimination and equal opportunity

At Sener, we strive to comply with the principle of equal opportunity and fair treatment

for all employees, regardless of gender, race, religion, sexual orientation, nationality or disability. We expect our suppliers to hire and promote their employees based on their work, and not on any personal characteristics or other factors outside the performance of professional activities; and to create an environment of full respect for others, prohibiting any discrimination, abuse or harassment.

Freedom of association

Suppliers must support the right of employees to join trade unions or engage in any form of collective bargaining, as allowed by the applicable laws, without interfering with or coercing their freedom.

Ethics in business

Sener suppliers must develop their business relationships in compliance with corporate ethical principles, and exhibit integrity, transparency and legality in all their operations.

Anti-corruption

In keeping with our principle of zero tolerance for any type of corruption², suppliers must comply with all the applicable anti-corruption laws and regulations in the countries where they do business or where they carry out part of their activity.

Suppliers must not offer, promise, deliver or provide, directly or indirectly, any type of bribery, gift, benefit or reward that may influence decision-making, or that is intended to secure or maintain a business or service for its own or Sener's benefit (including facilitation payments), whether with public or private entities. It is important to note that it is strictly forbidden to offer or promise any type of gift, invitation or consideration to Sener's professionals during the selection and contracting process.

Similarly, and to establish anti-corruption mechanisms, we expect our suppliers to vet their third parties through a process of due diligence that guarantees compliance with anti-corruption regulations throughout the supply chain.

Conflict of interest

Suppliers must immediately disclose any type of conflict of interest that may affect the execution of a project or the fulfilment of their contractual obligations, and they must have mechanisms in place to ensure independence in their actions if any of their workers should have a potential conflict of interest.

Relationship with authorities

Suppliers are responsible for establishing transparent communication with authorities and strictly complying with all applicable regulations. This means providing accurate and complete information when required, as well as having a collaborative and transparent attitude.

Fair and honest competition

Suppliers are expected to engage in fair competition and to respect the applicable competition laws in those countries and markets where they operate. This includes not participating in anticompetitive practices, such as price fixing agreements, fraudulent manipulation of tenders, sharing of markets, territories or customers between competitors, as well as not making misleading advertising, or that denigrates their competition or third parties.

Workplace safety

At Sener, we are committed to excellence in the health and safety of people in the exercise of their professional activity, which is why we expect our suppliers to not only comply with all applicable regulations, but to employ all the tools needed to guarantee the well-being of their workers in their professional spaces.

We promote the extension and application of our occupational health and safety policies and standards, as much as possible in each case, to the work areas of their suppliers or subcontractors, and request to be notified immediately of any irresponsible or irregular behaviour in terms of health and safety.

In this regard, the supplier undertakes to provide its workers with a healthy and safe work environment, managing any type of risk by preventing accidents or behaviours that endanger the health of workers.

Transparency and records

Suppliers must keep accurate and reliable information in their records, ensuring that the economic and financial information provided to third parties and regulators is precise, timely, complete and understandable, and that it adheres to accepted accounting criteria. This includes invoices, contracts, communications and any other relevant documentation.

Exports and transport

Suppliers must comply with the applicable export regulations of the country of origin and destination of the goods. This includes obtaining the necessary authorisations or licences and permits, complying with commercial restrictions and ensuring that products satisfy international standards.

Quality of products and services

Suppliers are expected to offer products and services that meet the quality and safety parameters contained in the applicable regulations and agreed specifications, and to conduct quality tests to ensure that products are safe and reliable.

Confidentiality and security of information

The information that Sener provides to our suppliers will generally be considered confidential or secret.

² [Sener Anti-Corruption Policy](#)

Confidentiality

Suppliers are required to preserve the integrity and confidentiality of all the information provided by Sener, and of any other information they may have access to as a result of their commercial relationship with the company. This confidentiality covers everything from financial and strategic data, to information about our customers and employees.

Information security

Suppliers must ensure that necessary and sufficient security measures are in place to protect information, and they must periodically assess the effectiveness of said measures.

Data protection

We are committed to the security and guarantee of rights relating to the privacy and protection of the personal data of our employees and our stakeholders, in accordance with the applicable laws in this regard.

Accordingly, suppliers must comply with privacy and data protection laws, including not disclosing or transferring data without consent, ensuring data are accessed and stored securely, and complying with local and international regulations in this regard.

Environment

As part of Sener's commitment to protecting the environment and to sustainable development, we expect our suppliers to comply with the applicable environmental laws, as well as to promote environmentally responsible procedures and solutions that minimise any kind of impact from their operations on the environment and on natural resources.

4. Integration with the Compliance System

This *Supplier Code of Conduct* is part of Sener's Compliance System, and it will be the Compliance Division, together with the Compliance Body, that is responsible for its interpretation and integration.

This document does not consider all the possible actions or scenarios involving the activity of the various Sener suppliers, which is why it provides a set of criteria that can be used to guide the conduct of our suppliers, their administrators and employees over the course of their commercial and professional activity with Sener.

In this regard, for those suppliers that have their own written code of conduct, we expect that said code will contain, at a minimum, the expectations and/or duties of this Code; and that they are relayed to their supply chain as part of our commitment to compliance, integrity and sustainable development throughout our operation.

5. Acceptance and responsibilities of our suppliers

Suppliers, their administrators and employees shall expressly accept the rules contained in this Code for as long as they remain Sener suppliers.

Failure to comply with this *Supplier Code of Conduct* may negatively impact a supplier's relationship with Sener or result in the termination of said relationship, and it may also entail legal or administrative actions as applicable.

If any irregularity or violation of this Code is detected, or if any information is deemed relevant, it must be immediately reported to Sener's Compliance Department or through the [Sener Ethics Hotline](#), located on Sener's corporate website.

6. Approval by the Board

This Sener *Supplier Code of Conduct* was approved by the Board of Directors of Sener Grupo de Ingeniería, S.A. at its meeting held on 24th July 2024, and is effective upon approval.



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