

# Sustainable procurement policy

## Sener





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This Policy aims to establish the sustainability principles that should guide the responsible behaviour and management of the goods and services purchased by Sener, including capital goods, in keeping with our strategy and purpose.

With this Policy, we want to integrate ESG (Environment, Social and Governance) criteria into our procurement processes in order to prevent and mitigate any possible adverse impacts associated with this activity, ensuring that we engage in responsible practices that are consistent with our sustainability strategy, while preserving the environment and generating a positive impact for society.

## 1. Scope of application

This Policy must be applied in the Sener Grupo de Ingeniería, S.A. and its subsidiaries (hereinafter Sener), and must be complied with by their directors, managers and employees, as well as by third parties with which we maintain contractual relationships. Persons acting as Sener representatives in companies and entities not belonging to the group, or where Sener is not in effective control, will promote, as far as possible, the implementation of principles and guidelines that are consistent with those set out in this Policy.

## 2. General commitments and principles

Sener's Sustainable Procurement Policy is based on the following general commitments and principles:

- Contribute to the fight against climate change, prioritise **contracting third parties that demonstrate more responsible and efficient consumption of energy and water resources**, as well as a true commitment to the **circular economy**.
- Promote the **acquisition of goods and services from local suppliers**, or those with a local presence, to promote the development of the communities where we work.
- **Uphold a culture of ethics, integrity and compliance**, as reflected in our Code of Conduct, which translates into **transparency, traceability, independence and objectivity** in all the decisions taken by the purchasing departments.
- Encourage our suppliers and subcontractors to have a policy of **equality, diversity, inclusion, non-discrimination, work-life balance, and the safety and well-being of people**. To this end, we will prioritise the contracting of third parties that have a proven commitment to defining these policies and to achieving excellent results in these areas.
- Promote **collaborative innovation through partnerships with our suppliers** by integrating new materials, products and services that allow us to reduce the carbon footprint associated with our procurement processes.
- **Prompt our suppliers to comply with Human Rights and the ten principles of the**

**United Nations Global Compact** as a reference framework.

- **Measure the ESG positioning of our suppliers** and act accordingly through **convergence plans** when necessary so as to gradually make our supply chain more sustainable.
- **Train and raise awareness** of both buyers and suppliers of the **need to contribute to sustainability through purchasing**, and encourage them to, in turn, pass on this commitment to their value chain.
- In order to guarantee the **preservation of the environment**, our suppliers must demonstrate compliance with the applicable laws that ensure **correct environmental performance**, and they must be certified in standards that demonstrate that **they avoid or minimise their impact and/or protect biodiversity**.

## 3. Supervision and review

In the performance of its duties, Sener's Board of Directors is responsible for approving corporate policies and strategies, and therefore it approves this Policy and reaffirms its commitment to its implementation in all the companies controlled by the Sener Group.

## 4. Approval and update

Sener's Sustainable Procurement Policy was approved by the Sener Group's Board of Directors on July 24th, 2024, on which date it went into effect.

It will be subject to regular reviews to ensure it is up to date and relevant, so that our purchases contribute effectively to the area of sustainability.



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