



# Supplier Code of Conduct

July 2025

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## Framework

VANGEST – Engineering Solutions, S.A. (hereinafter referred to as “VANGEST”), along with all other entities operating under its management, is committed to conducting its activities as a socially responsible organization, with a strong ethical sense and a focus on sustainable growth, ensuring compliance with relevant laws and regulations. Similarly, we expect our partners to adopt this commitment by adhering to this Supplier Code of Conduct.

The principles described in this Supplier Code of Conduct establish the minimum requirements for action and guidance for our suppliers in the areas of: labor and human rights, health and safety, the environment, ethical responsibility, and management systems.

The term “supplier” refers to organizations that provide goods or services to VANGEST, including suppliers, vendors, contractors, consultants, agents, and other service providers who establish a business relationship with VANGEST.

This Code is complementary in nature, meaning it does not replace any contractual requirements nor does it override any applicable laws or regulations. VANGEST expects its suppliers to comply with this Code as well as all applicable laws and regulations.

VANGEST is committed to maintaining an ethical, safe, inclusive, and socially responsible working environment, in accordance with the following fundamental principles.

## Ethical Commitment

VANGEST expects its suppliers to uphold high ethical standards and ensure compliance with good governance practices.

- Suppliers must comply with local and national laws relating to anti-corruption, bribery, money laundering, embezzlement, extortion, or fraud, in any form.
- Suppliers must accurately disclose information related to their business operations, in accordance with applicable legislation and standard industry practices.
- Suppliers must comply with legal and regulatory requirements regarding data privacy and information security, as well as VANGEST’s Privacy Policy (available at <https://vangest.com/company/privacy-policy/>), whenever personal data, intellectual property, or company information is collected, stored, processed, transmitted, or shared.
- Suppliers must maintain the highest standards of fair competition and business conduct. They must avoid conflicts of interest and act honestly and ethically throughout the supply chain, in accordance with applicable laws, including those related to anti-competitive practices.
- Suppliers must exercise due diligence regarding the materials sourced in their supply chain, including the implementation of policies and procedures that identify relevant risks and take appropriate measures to mitigate them. Suppliers are expected to ensure that all materials and products meet applicable requirements related to Conflict Minerals.
- Suppliers must provide a clear and accessible whistleblowing mechanism that enables their employees to raise concerns or report misconduct without fear of retaliation.

## Commitment to Human Rights

We respect and protect human rights as recognized in the Universal Declaration of Human Rights and in key international agreements on this matter, as well as any additional local regulations that reinforce these principles. In this regard, we also expect all suppliers to respect workers' human rights in their hiring practices and to implement procedures to prevent, monitor, and take effective actions to mitigate negative impacts, as well as to communicate these requirements throughout their supply chain.

- Suppliers must not employ child labor or tolerate any form of exploitation of underage workers.
- Suppliers must not use forced labor, bonded labor, involuntary prison labor, or any other form of forced or involuntary work. Suppliers must not participate, directly or indirectly, in human trafficking or modern slavery.
- Suppliers must not engage in harsh or inhumane treatment, including violence, sexual harassment or abuse, mental or physical coercion, intimidation, or verbal abuse of workers, nor threaten such treatment.
- Suppliers must ensure a workplace free of harassment and discrimination.
- Suppliers must comply with local laws and regulations concerning working hours. All overtime must be voluntary.
- Suppliers must pay wages and provide benefits in accordance with local laws and regulations, including those related to minimum wage, overtime pay, and sick leave.
- Suppliers must comply with local laws and respect workers' rights to freedom of association.
- Suppliers must promote and uphold the principles enshrined in the Universal Declaration of Human Rights.

## Commitment to Health and Safety

VANGEST expects its suppliers to commit to ensuring the necessary conditions to provide a clean, safe, and healthy work environment for their employees, aimed at preventing work-related injuries and health issues, in compliance with legally required standards. Suppliers must have implemented safety procedures for employees and everyone present on their premises, as well as at all other locations where they conduct activities.

- Suppliers must protect workers from any significant workplace and activity-related risks.
- Suppliers must provide appropriate health and safety training, in a language that workers understand, including training on the use of equipment and the safe performance of their duties. Where risks cannot be adequately controlled, suppliers must provide workers with appropriate and properly maintained personal protective equipment (PPE), along with informative materials about associated risks.
- Suppliers must ensure the use of well-maintained equipment in good working condition.
- Suppliers must identify, assess, and control potential risks, minimizing their impact through the implementation of preventive and corrective actions, such as emergency plans and

other response procedures to reduce the likelihood of accidents and incidents as much as possible. They must adopt effective measures to minimize risks associated with their activities and job roles.

- Suppliers must have procedures and systems in place to prevent, monitor, manage, and report occupational accidents and diseases, including mechanisms that encourage workers to report concerns.
- Suppliers must ensure strict compliance with Health and Safety legislation, as well as all other applicable laws within the scope of their activities.
- Suppliers must maintain all necessary and legally required insurance policies for conducting their operations.
- Suppliers must implement incident and accident management policies and procedures.

## Environmental Commitment

VANGEST expects its suppliers to recognize and understand the environmental impacts of their operations, and to minimize adverse effects on the community, the environment, and natural resources by acting in a more sustainable manner.

- Suppliers must comply with applicable local, national, and international environmental laws.
- Suppliers must promote and ensure environmental protection, pollution prevention, and the minimization of the environmental impacts of their activities.
- We recommend that suppliers monitor, document, and publicly disclose their Scope 1 and Scope 2 greenhouse gas emissions, whenever applicable.
- Suppliers should strive for continuous improvement in energy efficiency and minimize energy consumption and greenhouse gas emissions.
- Suppliers must implement a management system focused on waste reduction and valorization.
- Suppliers must ensure compliance with requirements related to the management of chemical substances and applicable restrictions.

## Management Commitment

Suppliers must ensure the confidentiality and security of information related to data obtained from stakeholders and information made available or accessible throughout the supplier's activities.

Suppliers must also ensure that all persons working for them, regardless of the nature of the legal relationship, comply with the provisions of this Code and are informed, trained, and competent to perform their duties in accordance with its terms.

Suppliers must adopt management procedures that promote the compliance and monitoring of this Code, and they are obligated to report any serious non-compliance to VANGEST and provide evidence

of compliance when requested. For this purpose, they may use the whistleblowing channel available on the website (<https://report.whistleb.com/en/vangest>). Such notifications will be reviewed by the Compliance Department under strict confidentiality principles.

## Monitoring and Non-Compliance

VANGEST reserves the right to monitor its partners' compliance with this Code, on a regular or ad hoc basis, if necessary.

If the supplier violates its obligations under this Code, or if a violation is imminent, reasonable corrective measures must be taken immediately to ensure compliance with contractual obligations and to prevent, stop, or minimize the extent of the breach.

In addition to VANGEST's right to claim damages, the supplier is obliged to indemnify VANGEST for all consequences resulting from violations of this Code for which it is responsible, including fines and penalties, as well as claims from third parties or authorities.

VANGEST will address cases of non-compliance with appropriate actions, which may include working together with the partner to resolve any non-compliance within a suitable timeframe. However, VANGEST reserves the right to terminate the business relationship in the event of serious or repeated violations.

## Review and Disclosure

The Supplier Code of Conduct will be reviewed every three years or whenever deemed appropriate, especially when there are changes in laws and regulations.

The Compliance Department is responsible for reviewing and updating this Code, which is subject to approval by the Executive Committee.

In addition to internal dissemination via the intranet, the Supplier Code of Conduct will be published externally on VANGEST's website.

Annex I - Statement of Acknowledgement

Supplier/Service Provider Identification

\_\_\_\_\_ (name of the company/solo trader), legal entity no. \_\_\_\_\_( Company/Tax ID), with registered office at \_\_\_\_\_ (address), ZIP Code\_\_\_\_\_, city and country \_\_\_\_\_, and its undersigned representatives hereby declare that, for all due purposes, the company and/or legal entity they represent has read and understood the **VANGEST, S.A. Supplier Code of Conduct**, dated July 2025.

We further declare that our conduct shall be guided in accordance with the principles and values set out in the **VANGEST, S.A. Supplier Code of Conduct**.

Confirmation			
Role	Name	Signature	Date
Representative			
Quality Manager			



## Supplier Code of Conduct

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