



CODE OF CONDUCT FOR SUPPLIERS

Manfisa Wire and all the companies of the group consider their suppliers to be an essential part in the search for compliance with the objectives of profitability, sustainability, quality, excellence, and customer satisfaction. To this effect, we seek to maintain a relationship based on trust and cooperation within the supply chain in search of mutual benefit.

The main requirements of this code of conduct seek to establish the minimum guidelines that suppliers must maintain to properly develop their activity according to basic principles of ethics and professional conduct.

1. HUMAN RIGHTS AND LABOUR CONDITIONS

Human rights:

Suppliers will respect both individual and collective human rights affected by their operations. They must prevent, evaluate, and correct any adverse impact derived from their operations in accordance with international instruments on human rights.

Forced labour:

Suppliers will neither engage in nor allow forced and/or compulsory labour. All employment is voluntary, and all staff are free to leave their employment after giving reasonable notice.

Child labour:

Suppliers shall not employ minors under any minimum age for employment in any phase of their activities under applicable laws and regulations.

Work hours:

Suppliers must comply with national laws, regulations, and industry standards regarding working hours, including overtime, holidays, and paid vacations.

Regarding people and non-discrimination:

Suppliers will treat their employees with respect and dignity and will not support discrimination or harassment of any kind, including but not limited to race, age, colour, gender, sexual orientation, language, religion, disability, political or other opinion, or national or social origins.

Suppliers will refuse to tolerate any unacceptable treatment including mental cruelty, sexual harassment, language, or physical contact that is sexual, coercive, threatening, abusive or exploitative.

Decent employment:

Suppliers will remunerate their workers in accordance with applicable laws, guaranteeing their employees' right to rest and will comply with current labour legislation within the sector in which they operate.

Respect for freedom of association and collective bargaining:

Suppliers shall facilitate and respect the legally recognised rights of their workers to unionise, assemble, of peaceful association and collective bargaining, subject to the applicable regulations in each case and without their exercise leading to retaliation.

Labour conditions:

Suppliers will ensure that they provide their staff with a written description of the terms and conditions of employment in a language they understand.

Wages and benefits must meet industry or national legal standards and must be sufficient to cover basic needs and provide discretionary income.

Payments must be made on time, in legal tender and fully documented.

Local communities:

Suppliers will respect the rights and integrity of local communities, indigenous peoples, and other traditional groups whenever relevant to their operations. They must respect the culture, customs, and heritage of local communities.

The resettlement of people should be minimized, considering viable alternatives to the extent possible.

Suppliers shall consult and cooperate with those people affected by operations that may have a significant impact on land areas inhabited or used by indigenous peoples or other traditional groups.

Conflict minerals:

Suppliers must establish a written policy and procedure to avoid knowingly sourcing unsustainably mined or conflict minerals produced at high environmental and social costs.

2. BUSINESS PRACTICES

Corruption, bribery, and improper business conduct

Suppliers must carry out their business activity with integrity, objectivity, transparency, and honesty, without participating in any activity that may constitute a crime or breach of the law in terms of bribery, corruption, extortion or other illegal or unethical practices.

Suppliers shall not accept, offer, grant, promise or give anything of value or any other improper advantage to a government official or third party to influence or refrain from acting in the performance of their activities.

Providers will not initiate or encourage facilitation payments on behalf of Manfisa Wire SL, directly or indirectly.

Suppliers shall not offer, promise, give, solicit, or accept gifts, favours or hospitality that are beyond reasonable value, frequency, or inappropriate with respect to time and place.

Suppliers will comply with the strictest standards of ethical and moral conduct, international agreements, and will respect the applicable laws on this matter, ensuring the establishment of the appropriate procedures that are required for this purpose.

Money laundering

Providers will firmly oppose any type of money laundering regulation and will take appropriate measures to prevent third parties from using their financial transactions for money laundering or financial terrorism.

Trade sanctions

Suppliers must comply with the relevant commercial sanctions for the commitment with Manfisa Wire SL.

Competence

Suppliers will not engage in any other type of contract, agreement or activity that violates applicable competition laws and regulations.

Conflict of interest

Suppliers must maintain a mechanism that, in the event of a potential conflict of interest of any of their workers, guarantees that the independence of the supplier's actions and their full compliance with the applicable legislation will not be affected.

Information confidentiality

Suppliers must preserve and protect the confidentiality of the information they receive from Manfisa Wire SL as a result of the performance of the commercial activity and will comply without exception with current legislation on data protection and intellectual property.

3. HEALTH AND SAFETY

Suppliers will guarantee a healthy and safe work environment for all their personnel and will comply with applicable laws and regulations in force to minimize health and safety risks.

Suppliers will ensure that personnel understand the hazards and safe practices for their work and must have adequate protection whenever necessary.

Suppliers shall provide appropriate training on health and safety issues.

4. ENVIRONMENT AND CLIMATE

Suppliers must ensure that their operations comply with environmental regulations, agreements, permits and laws for the geographic areas in which their facilities are located.

Suppliers will try to minimise the environmental and climate impact of their activities, products, and services, and will implement environmentally friendly technologies and processes to ensure the sustainable use of natural resources, the safe management of waste, and the reduction emissions to air and water.