



**EZENTIS**

# **RESPONSIBLE PROCUREMENT POLICY**

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**GRUPO EZENTIS S.A.**

**26 March 2021**

[Translation from the original in Spanish. In case of discrepancy, the Spanish version prevails]

# 1. OBJECT

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The Responsible Procurement Policy (hereinafter, the "Policy") aims to establish a general framework for action to ensure that the selection and contracting of suppliers and contractors complies with internal regulations and is in line with the company's commitment to sustainability.

As part of the responsible management pursued, this Policy includes guidelines for the purchase of goods and services that combine the balance between economic, environmental and social aspects (ESG).

The main objectives of this Policy are summarised as follows:

- a) To establish and publicise Grupo Ezentis commitment to sustainability in its relations with suppliers and contractors.
- b) To promote among suppliers and contractors compliance with minimum standards related to human and labour rights, occupational health and safety of their workers, respect for the environment and ethical behaviour.
- c) Disseminate and promote the application of the United Nations Global Compact Principles and the Sustainable Development Goals among its suppliers and contractors.



## 2. SCOPE

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This Responsible Procurement Policy refers to the procurement process of goods, products and services of all nature.

This Policy applies at the corporate level and is therefore applicable to all companies comprising Grupo Ezentis, currently made up of the public limited liability company Grupo Ezentis, S.A. and its dependent companies (hereinafter, "Grupo Ezentis").

This Policy applies to all employees, especially those in the purchasing areas in the different geographical areas and lead the follow principles and guidelines aligned within this Policy and other internal regulations, such as the Sustainability Policy, the Code of Ethics and Conduct and the Human Rights Policy. This Policy is therefore considered to be a corporate reference document and serves as a guide for all the Group's Procurement departments.

Without prejudice to the foregoing, this Policy will be developed and complemented with the different policies approved in the Group that are directly related to the principles of action defined in point 3.

The appropriate adaptations will be made, where necessary, in order to, among other reasons, comply with national and EU regulations, as well as with the recommendations or requirements formulated by the corresponding bodies.

Grupo Ezentis, S.A., in its capacity as parent company, is responsible for laying down the foundations, instruments and mechanisms required for appropriate and efficient coordination between the Company and the other members of the Group, so as to ensure compliance with this Responsible Procurement Policy.

## 3. OPERATIONAL PRINCIPLES

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Grupo Ezentis procurement processes for goods and/or services shall be carried out in terms of impartiality and strict compliance with the following Principles:

### 1. Legality

All procurement processes for goods and services carried out by Grupo Ezentis shall be conducted in accordance with current legislation applicable in each geography in which the company operates.

### 2. Quality

Quality assurance of the products and services supplied to Grupo Ezentis.

### 3. Efficiency

Procurement of goods and services in accordance with the principles of necessity, suitability and austerity.

### 4. Equal opportunities

To seek, whenever possible, the free concurrence of several suppliers for the same request in order to ensure that the process is in accordance with the principle of fair competition.

### 5. Sustainability

As far as possible, sustainability criteria shall be included in the procurement of goods and services, giving priority to those that are environmentally friendly and favour the socio-economic development of local communities.

### 6. Ethical and responsible behaviour

Relations with suppliers developed under criteria of transparency, loyalty, honesty and respect for people. Likewise, all employees of Grupo Ezentis must comply at all times with the provisions of the Code of Ethics and Conduct and the Human Rights Policy.





### 7. Objectivity

Decisions based on the evaluation of the selection criteria established in the rules applicable to Grupo Ezentis, which have previously been clearly and accurately provided to all suppliers and/or contractors.

### 8. Transparency and communication

Direct, collaborative, fluid and transparent communication with all suppliers and contractors.

## 4. RESPONSIBLE PROCUREMENT MODEL

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In order to adequately monitor and supervise compliance with the principles set out above, Grupo Ezentis has implemented a Responsible Procurement Model which, in general terms, includes the following due diligence phases:

**1.Public commitment:** Review, updating and dissemination of this Policy to all employees of Grupo Ezentis and other interested parties, and accessibility through its publication on the company's website.

**2.Supplier and contractor approval process:** Evaluation of suppliers and registration in the database of all those that meet minimum financial and non-financial requirements. Among other documents, suppliers and contractors must commit to compliance with the Code of Ethics and Conduct, the Human Rights Policy, the Sustainability Policy and the occupational health and safety standards established by Grupo Ezentis within the organisation.



**3. Analysis of critical suppliers:** Implementation of a specific ESG analysis of suppliers that, due to their characteristics, uniqueness and suitability, are strategic for the company.

**4. Communication mechanisms:** Grupo Ezentis purchasing areas remain in constant contact with suppliers and contractors in the event of any request, doubt or question related to purchasing processes.

To resolve doubts about ESG information and documentation requests and organise joint work sessions, the communication channel set up for this purpose is via e-mail [sustainability@ezentis.com](mailto:sustainability@ezentis.com).

**5. Accountability:** The results of the application of this Policy, the evolution of stakeholder expectations, the company's strategy and the regulations in force regarding responsibility in the supply chain will be reflected annually in the Statement of Non-Financial Information and in the Sustainability Report.

Finally, it should be noted that Grupo Ezentis, in line with this Policy, will avoid contracting with suppliers/contractors known to have incurred in any legal, tax, labour, environmental, health and safety or human rights breach in the last two years and which have not been resolved or publicly communicated in the interests of transparency and information to all stakeholders involved in the value chain.

## 5. MONITORING AND SUPERVISION

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The Board of Directors of Grupo Ezentis, S.A. is the body responsible for the approval of the Group's Responsible Procurement Policy and, therefore for overseeing compliance with the principles and commitments set out in this regulatory framework.

The Appointments and Remuneration Committee has previously reviewed and reported favourably on the approval of this Policy. The Appointments and Remuneration Committee will be the body responsible for periodically supervising the performance and monitoring the Ezentis Group's compliance with sustainability in the supply chain.

The Responsible Procurement Policy shall be disseminated within the organisation and to stakeholders, ensuring that it is available, updated and known to all stakeholders.

## 6. APPROVAL AND REVIEW

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This Responsible Procurement Policy was approved by the Board of Directors of the Company on 26 March 2021, will remain in force indefinitely and will be published on the Company's corporate website. Its content will be subject to periodic review, with any changes or modifications deemed appropriate.

In accordance with the provisions of the Board Regulations, the Board of Directors of the Company shall be periodically informed by the Appointments and Remuneration Committee as to the application of this Policy, the supervision of compliance with its general action principles, as well as the verification of the maintenance of the main relations of the Company with its stakeholders.





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