

kovecta

Responsible purchasing policy

Corporate Policies 2025



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01

Purpose

The objective of this Responsible Purchasing Policy (hereinafter, the “Policy”) is to establish and disseminate the basic and general rules of Konecta, a multinational group of companies specialising in the provision of digital customer management services and solutions (hereinafter, Konecta, the Company, or the Firm), in order to achieve responsible and efficient management in the procurement of goods and services, as well as in the management of its suppliers, generating value for the company, society and the environment.

This Policy is an extension of Konecta's regulatory framework with the aim of promoting best practices in the company's purchasing activities, in line with the guidelines for conduct established in the Code of Ethics for Suppliers, the Code of Ethics and other applicable policies that make up its Compliance Programme, while also ensuring strict compliance with the laws and regulations in force in each country, its own requirements and international standards. This Policy will be available on the corporate website (www.konecta.com) to ensure that it can be consulted by all interested parties.

Similarly, the Responsible Purchasing Policy responds to the expectations of Konecta's stakeholders (employees, clients, partners and shareholders, investors, financial institutions, suppliers, public administration and regulatory bodies).



02

Scope of application

The content of this Code applies globally to all Konecta entities as part of its Compliance Programme and is endorsed by the company's senior management.

Consequently, it is mandatory for all Konecta employees, regardless of their position or role within the organisation or their geographical location.

Notwithstanding the foregoing, the scope of action and application of this Code may, when necessary and possible due to the nature of the relationship, be extended to all individuals and/or legal entities linked to Konecta on a business or professional basis, for a relationship other than employment: suppliers, contractors and workers in the supply chain, and business partners.

Given that many of Konecta's companies have their registered office outside the European Union, internal regulations will be adapted to the regulations of each State, respecting and ensuring the basic principles set out herein striving for continuous improvement of existing procedures and operations for the responsible procurement of goods and services, improving all management control systems.



03

General principles of action

Konecta maintains a zero-tolerance policy towards any type of corruption, bribery, fraud, embezzlement and other undue benefits, whether involving public officials or private individuals. This principle is absolute and prevails over any potential benefit to the company or its stakeholders if it derives from a transaction that is irregular, illegal or contrary to the law or the Code of Ethics.

Aware that each of the countries in which the company operates has a different social context and different needs, this Responsible Purchasing Policy is articulated through plans and actions related to the principles set out therein, adapted to the reality of each of its local operations.

Konecta attaches essential importance to the responsible management of resources, with the following basic principles applying to all its purchasing and/or contracting processes:

Criteria for suppliers and contractors:

- Compliance with all the basic principles and guidelines for action established in the Code of Ethics for Suppliers and the rest of the policies of the Konecta Compliance Programme, as a reference for the proper performance of their activity, in line with the corporate culture and values of the company, expressing their commitment to respect for human rights, integrity and ethical behaviour, environmental protection and safety, as well as the protection and transparency of information.
- Zero tolerance for any form of modern slavery -understood as forced or compulsory labour, bonded labour, child labour and human trafficking, as well as deceptive recruitment of labour and services, both in their operations and in their commercial activities and supply chains.
- Commitment to ensuring the quality of the products and services provided, innovation and R&D.
- Preserving and protecting the confidentiality of the information they receive as a result of their commercial activity with Konecta and complying without exception with current legislation on data protection and intellectual property.

Konecta's Code of Ethics for Suppliers and Code of Ethics establish the guidelines for action in this area.

Criteria for Konecta's Purchasing Departments:

Those departments with the capacity to make purchases and manage the contracting of services in accordance with the procedures defined by Konecta (PG COR 05 Purchasing) have the following responsibilities:

- Ensure that the selection of suppliers complies at all times with existing internal regulations and, in particular, with the guidelines included in Konecta's Code of Ethics, referring to integrity and ethics, transparency, trust, excellence, professionalism, innovation and sustainable development.

Given that the safety and quality of the goods and services delivered is essential for the company, Konecta has a mandatory pre-approval process for its suppliers (PG COR 08 Supplier Approval), as a fundamental requirement for their engagement.

In this regard, and with the aim of effectively complying with European directives on due diligence and information on sustainability, Konecta made the corporate decision to outsource the approval process, transferring its management to another company with proven and extensive experience in supply chain analysis.

- Require compliance with applicable laws and regulations in the countries where the company operates, as well as with fundamental criteria related to human and labour rights, safe and healthy environments, non-discrimination and equal opportunities, respect for the environment and ethical behaviour, as reflected in the Principles of the United Nations Global Compact and the Sustainable Development Goals of the 2030 Agenda, the Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organisation.
- Ensure independence and objectivity in decisions regarding the purchase of goods or contracting of services, which must be made without regard to any personal, family or financial ties that could cast doubt on the criteria used in decision-making, all in accordance with the provisions of the Code of Ethics, the Code of Ethics for Suppliers and the procedures (PG COR 05 Purchasing, PG COR 08 Supplier Approval and PG COR 06 Supplier Evaluation, among others), as well as the selection criteria established in the existing internal manuals regulating the procurement process.
- Streamline the procurement of goods and services to ensure that spending is in line with the principles of necessity, suitability and austerity. To this end, all purchases and contracts with suppliers of goods and services must be carried out through the designated person in each purchasing organisation, with involvement from the outset, monitoring and approval by the Purchasing Department.
- Promote business diversification, as far as possible, among different local, national and international suppliers, in order to encourage balanced wealth creation, equal opportunities and risk diversification.
- Ensure the continuous improvement of the purchasing process, promoting the incorporation of corporate responsibility and sustainability principles into the approval process, positively evaluating those suppliers who demonstrate:
 - Specific actions in the area of corporate responsibility.
 - Actuaciones concretas en el ámbito de la responsabilidad corporativa.
 - The adoption of labour and social standards that promote respect for the fundamental rights of workers and third parties in the company's sphere of activity, such as the basic conventions of the International Labour Organisation, the Guiding Principles of the United Nations Global Compact and its Sustainable Development Goals, or any other

applicable treaty, convention, guideline or standard issued by international organisations.

- Stimulate demand for sustainable products, services and/or projects.

Konecta will avoid contracting with suppliers who have been expressly found to have committed any legal, fiscal, labour, environmental, health and safety or human rights violations in the last three years.

These principles of action respond to the impacts, risks and opportunities (IROs) arising from the applicable material issues: compliance and corporate ethics, supplier management, communication and transparency with stakeholders.

Employees, suppliers or any third party who suspect the existence of any potential breach related to this Policy, the Code of Ethics or the Code of Ethics for Suppliers may submit their information, questions or concerns on this matter confidentially and without fear of reprisals through the Information Channels available on the corporate website at the following URL: <https://konecta.integrityline.com>, depending on the nature of the situation, in accordance with procedure PG COR 26 Information Channels, available in the same space, which specifies the different channels available and the nature of the communication that can be made through them.

This channel is available 24 hours a day, 7 days a week. No reprisals will be tolerated against anyone who, in good faith, reports facts that could constitute a breach of this policy, and the guarantees and protections established by the applicable regulations and legislation will apply to those who report.

Breaches of this policy will be subject to the corresponding disciplinary measures in accordance with internal rules and procedures, without prejudice to any administrative or criminal penalties that may also result from such breaches and which may be imposed by the competent authority.

04

Updating and revision

The Responsible Purchasing Policy will be reviewed and updated periodically, or when necessary, to adjust it to changes in the business model, or that may occur in Koneccta’s field of activity, or as a result of the approval of directly applicable regulations, ensuring its effectiveness and compliance.

NOTE: This Policy has been reviewed and approved on December 16, 2025, by the highest governing body and replaces any previous version of it, with only this document being valid from this date onwards.

Version Control

Version	Review date	Reviewed	Validated	Approved	Reason for change
2	06/22/2021	Organization & Procedures	Legal Affairs	Board of Directors	General Policy Review
3	12/19/2022	Organization & Procedures	Legal Affairs	Board of Directors	General Policy Review
4	12/16/2025	Procurement Organization & Procedures	Legal Affairs	Board of Directors	Alignment with legal requirements Alignment with the new format and branding