

CODE OF ETHICS
FOR SUPPLIERS

Madrid, December 19, 2022

Konecta






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1.- SCOPE OF THE CODE OF ETHICS FOR SUPPLIERS

Grupo Konectanet, S.L.U. and all its group companies (hereinafter jointly referred to as “Konecta”) deem suppliers as an essential element for achieving the company goals related to growth, quality, excellence and customer satisfaction, and thus seek to establish with them relationships based on trust and mutual gain.

The Code of Ethics for Suppliers (hereinafter, the “Code”) is understood as an extension of Konecta's General Code of Ethics and aims to establish the minimum guidelines to be maintained by suppliers for the proper development of their activity, as well as their commitment to basic principles of ethics and professionalism.

This Code shall apply to all Konecta's suppliers or subcontractors.

Suppliers are required to be familiarised and comply with this Code, and agree to adhere hereto, expressing their commitment to abide by the ethical principles of Konecta contained herein.

2.- ETHICAL PRINCIPLES OF SUPPLIERS

Konecta is an organisation fully committed and subject to the Principles of the UN Global Compact since 2004, as well as to the Guiding Principles on Corporate Responsibility concerning the respect of human rights and the Principles of Sustainable Development, hence why it selects its suppliers on the basis of their respect and compliance with these principles, as well as of the laws and regulations applicable in each of the countries where it operates, and their endorsement and respect for internationally recognised human rights.

Hereunder, Konecta lists a series of ethical guidelines principles to which suppliers or subcontractors are required to adhere.

Working conditions

Providers shall treat their employees with respect and dignity and shall provide the same opportunities in access to work and professional promotion, preventing at all times situations of discrimination due to gender or sexual orientation, race, origin, marital status, social status, religion, political or union ideas, age or disability.

Suppliers shall remunerate their employees in accordance with the applicable laws on wages, guarantee their employees their right to rest, and comply with the labour legislation in force with regard to working hours.

Suppliers shall facilitate and respect the legally recognised rights of unionisation, association and collective bargaining of their employees, subject to the rules applicable in each case, without their exercise deriving in reprisals of any kind.

Suppliers shall eradicate the use of child labour and shall neither tolerate nor use child labour at any stage of their activities, other than in accordance with all applicable laws and regulations.

Quality

Konecta implements a Quality Management System based on the ISO 9001 and the COPC standard and, in this vein, requires the following to its suppliers:

- That the services and products meet Konecta's requirements and expectations.
- To ensure that all services and products are subject to a quality control to secure compliance with the requirements agreed with Konecta.
- To ensure compliance with the applicable laws and regulations, as well as any other commitment voluntarily made.
- To maintain permanent contact with Konecta, with a view to jointly collaborate in the improvement of the services provided.

These commitments shall materialise in specific goals and targets within a continuous improvement process, in line with its resources and impacts.

Professional Ethics

Suppliers shall carry out their business activities with integrity, objectivity, transparency and honesty, without engaging in bribery, corruption, extortion or any other illegal or unethical practices.

Suppliers shall neither accept, nor offer or grant any public servants, Konecta employees any natural or legal person at the service of any authority, public or private organisation, political party or candidate for a public office, any commissions, gifts or remuneration to illicitly obtain or maintain business or other advantages.

Suppliers shall maintain mechanisms which, in the event of potential conflict of interest of any of their employees, ensure the supplier's independent performance and full adherence to the applicable legislation.

Suppliers shall preserve and protect the confidentiality of the information they receive as a result of their business activity with Konecta and comply, without any exceptions, with the current legislation on data protection and intellectual property.

Konecta is committed to the preservation, respect and protection of the environment, therefore, suppliers or subcontractors shall actively and responsibly be committed with environmental conservation, complying with the legal requirements and attempting to reduce, as far as possible, the environmental impact of their activities. It is the duty of all to respect the environment by encouraging and promoting environmentally-friendly actions.

3.- COMPLIANCE WITH THE CODE ACCEPTANCE AND ADHERENCE

This Code is deemed compulsory for all Konecta suppliers or subcontractors. Where a breach of the Code is detected, the supplier(s) concerned shall remedy said breach, where possible and without delay, upon written notice to Konecta through the dedicated channel enabled for this purpose. If said noncompliance is not corrected within thirty (30) days following said notice, the Supplier concerned shall be considered to have failed to fulfil his/her obligations, and Konecta shall be entitled to terminate the contract subscribed with said Supplier.

Konecta suppliers hereby commit to inform Konecta about any deviations with regard to the compliance with the Code of Ethics. They shall communicate any available information by e-mail to: lineaeticakonecta@grupokonecta.com. Suppliers shall remain, at all times, in good standing with the modifications and updates made to Konecta's General Code and the Code of Ethics for Suppliers.

Konecta shall publish the Code, as well as any other modifications or updates thereof on its website: www.grupokonecta.com. Konecta shall have the right to perform audits, in accordance with this section, to verify compliance with the Code by the supplier.

Acceptance and Adherence

The Supplier hereby acknowledges having read and understood the terms and conditions set forth in the Code of Ethics for Suppliers and agrees to its acceptance, adherence and commitment to comply therewith.

NOTE. This Supplier Code of Ethics was revised and approved on 19 December 2022 by the governing body of Grupo Konectanet, S.L.U. It replaces in all its terms any existing earlier version of the Code, this being the only valid document and application to date.