



Corporate Procurement Policy

CEO
1st July 2019

CONTENTS

1. Purpose.....	3
2. Scope of application	3
3. Contents	3

1. Purpose

The purpose of the Corporate Procurement Policy is to define the framework for action and basic guidelines to be followed in the procurement process at URBASER, integrating them into the Company's business model and strategy.

These basic guidelines reflect action principles that are conveyed to the organisation through specific procedures, thereby facilitating the compliance of URBASER.

URBASER operates in a number of countries, hence it is exposed to different sets of legislation. Procurement actions must therefore comply with the legislation applicable in each case, avoiding any conduct that might harm URBASER's reputation and have adverse consequences for the Company.

This Corporate Procurement Policy requires the involvement of all URBASER's divisions, aiming for the adequate purchasing management, and thus the achievement of the proposed objectives. Therefore, it is encouraged to maintain an active and two-way dialogue between the various divisions and the Corporate Procurement Department.

2. Scope of application

This Policy is applicable to all employees, managers and members of the governing bodies of URBASER S.A., its subsidiaries and holdings/joint ventures in which URBASER is the majority shareholder/partner or where control is held by URBASER's management ("URBASER" or "the Company"). It is the responsibility of all URBASER employees to act professionally and protect the Company's reputation.

3. Contents

URBASER defines the following priority objectives with regard to procurement management:

- Compliance with the applicable law: All URBASER's suppliers must comply with the applicable law in each of the countries where they operate, avoiding any conduct that might harm URBASER's reputation and have adverse consequences for the Company or its business environment.
- Competitiveness and transparency: The procurement process and suppliers' selection must always follow transparent, competitive rules, as established in the internal procurement procedures.
- Developing relationships based on trust: URBASER is committed to establishing a framework of trust and partnership with all its suppliers and contractors, in order to build stable, lasting business relationships based on honesty, transparency and trust, with a view to achieving continuous improvement.
- Compliance with international agreements: At URBASER all suppliers, contractors and partners are encouraged to carry out their activities complying with the accepted international agreements, regarding Transparency and Business Ethics, Human and Workers' Rights, Environment, Quality, Health and Safety.
- Commitment to the Code of Conduct: Everybody who is involved in procurement activities at URBASER must act in accordance with the Code of Conduct, following the guidelines for ethical conduct that it contains. Likewise, they must comply with all the management system procedures that are applicable to them.
- Responsible contracting and purchasing using solvent, recognised suppliers: In general, all purchases should be arranged with suppliers who are recognised in their respective sectors and geographical areas, guaranteeing the quality of the goods and services acquired. For more critical purchases, suppliers will also be expected to accredit their solvency, in order to reduce the supply risk. All the suppliers must comply with the URBASER's Suppliers Code of Ethics.
- Better control and traceability of URBASER's purchases: Guidelines and systems must be in place to assure the control and traceability of purchases as well as the compliance with the guidelines established in the Company's specific procurement procedures.



www.urbaser.com