



Suppliers Code of Ethics

CEO
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REVISION LOGGING

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1. Introduction

Suppliers, contractors and collaborators (hereinafter, “suppliers”), despite being independent organisations, have a direct intervention in URBASER’s value chain. From this arises the need to establish an ethical conduct framework for defining URBASER’s relationships with all its suppliers and contractors.

As a socially responsible company committed to UN’s Sustainable Development Goals (SDGs), URBASER wishes to implement a framework of trust and collaboration with all its suppliers, so this “Suppliers Code of Ethics” serves as a means of establishing stable and long-lasting relationships based on honesty, transparency and trust aiming at constantly improving purchasing and contracting processes.

This Code is oriented at reciprocally benefiting both parties while respecting at all times the undertakings of the other party. URBASER considers that all its suppliers must maintain certain minimum behavioural guidelines to appropriately develop its activities.

In order to comply with all their social responsibilities, URBASER’s suppliers must comply with the applicable legislation in all the countries where it operates and must act in an ethical and integral manner to avoid any conduct that may damage URBASER’s reputation and cause adverse consequences for the company or its environment.

Supplier selection and awarding of purchases at URBASER are carried out following competitive and transparent procedures in accordance with the procedure set in the Corporate Policy for the Procurement of Goods and Services.

URBASER encourages all its suppliers to carry out activities in compliance with the international agreements on Corporate Transparency and Ethics, Equal Opportunities, Human and Worker Rights, Environment, Quality, and Health and Safety.

According to this premise, the values and principles included in URBASER’s Code of Ethics must be assumed by all its suppliers, so that they maintain and transfer them to their own supply chain.

URBASER expects all suppliers to participate in these basic international principles contained in the "Suppliers' Code of Ethics" and to transfer them to their own activity and that of their parent companies and subsidiaries, as well as to the rest of the supply chain, in such a way that it becomes an essential requirement for the maintenance of present and future business relationships.

Therefore, the company is responsible for complying with and enforcing this Code of Ethics enabled on the URBASER Intranet and publicly on the Group’s website (<https://www.urbaser.com/en/governance/>), as well as for reporting any breach of it through the Ethical Channel enabled on the Group’s website (<https://www.urbaser.com/en/ethics-box/>).

2. Principles

2.1 Transparency and Corporate Ethics

URBASER’s relationship with its suppliers is based on legality, efficiency and transparency. Therefore, all suppliers are expected to:

- Respect the laws, rules and regulations of the countries where they operate, not carrying out unethical practices or conducts that may damage URBASER’s image or reputation. Not accept, under no circumstances, bribes or other illegal incentives.
- Be transparent and upright in all financial, commercial or corporate publications they may issue and, in particular, in those mentioning URBASER.
- Manage their companies respecting loyal competition and in accordance with antitrust laws, as well as any other

compulsory regulation that allows it to carry out its activities in an ethical manner respecting competing companies.

- Manage any conflict of interest that may arise in relation to any of their employees.
- Respect the principles of confidentiality, so that they will not use the confidential information they may have received during the business relationship with URBASER, unless expressly authorised or required by law or in compliance with a court or administrative order. In addition, they will guarantee that the privacy of all employees and business partners, as well as the intellectual property rights in force, are respected.
- They undertake to comply with the established regulations and URBASER's Information Security Policy in the management of the Information owned by URBASER. As well as to have the means to guarantee the security of URBASER's information (Confidentiality, Integrity, Availability, Traceability and Authenticity).
- Have the means to guarantee the protection of the personal data they may access during the course of their activities.
- Respect the privacy and the right to privacy of all persons with whom they interact, in such a way that they commit to make responsible use of all data and information in accordance with the data protection laws contained in the legislation of each country.
- Refrain from offering or making direct or indirect payments in cash or in kind or any kind of payment to URBASER or any of its employees or other entities in order to illegally maintain a business or any other advantages or to abuse its influence.

2.2 Human and Worker Rights

URBASER respects the protection of fundamental human and labor rights and those recognized internationally and wants to extend them to all its suppliers as stated in its Corporate Human Rights Policy.

Our frames of reference in this aspect are:

- Universal Declaration of Human Rights. <https://www.un.org/es/about-us/universal-declaration-of-human-rights>.
- The Principles of the United Nations Global Compact. <http://www.pactomundial.org/category/aprendizaje/10-principios/>.
- ILO (International Labour Organisation) Declaration on fundamental principles and rights at work. <https://www.ilo.org/declaration/lang--es/index.htm>.
- The OECD Guidelines for Multinational Enterprises, which contain a series of recommendations on responsible business conduct that governments address to multinational enterprises operating or headquartered in adhering countries, and whose main objective is based on promoting the positive contribution of enterprises to economic, environmental and social progress worldwide. [48004323.pdf \(oecd.org\)](#).

Therefore, URBASER expects all suppliers, contractors and collaborators to carry out their activities as follows:

- Respecting at all times and in all their activities and locations internationally recognised and fundamental human rights.
- Maintaining a work environment where all workers are treated with dignity and respect, where no violent threats, exploitation or sexual, verbal or psychological harassment or any conduct that intimidates or offends the rights of people take place.
- Complying with labour laws and regulations regarding working days, salaries, benefits and working hours, respecting worker rights in accordance with the applicable laws in each country (minimum wage, extra time compensation, holidays, etc.).
- Treating all employees with respect, avoiding any conduct that may entail discrimination based on race, religious, political or union trade ideas, nationality, language, gender, civil status, age or disability. URBASER expects that its suppliers ensure at all times that their employees are not being harassed at all and will create an inclusive and caring work environment.

- Rejecting the use of child labour ⁽¹⁾ and respecting minimum age for the purposes of contracting in accordance with current legislation. Moreover, no young person ⁽²⁾ will carry out work that entails a danger to health or to physical, mental, social or moral development.
- Rejecting and eliminating all kinds of forced or coerced labour.
- Respecting the freedom of trade unions and the right to collective bargaining for workers as stipulated in the pertinent standards, rules and legislation in each case.
- Respecting legal reserves for contracting people with disabilities, in accordance with the existing legislation in force in each country.
- Considering the implementation of work-life measures favouring the respect for the personal and family life of all employees and facilitating the balance between their personal and family life and work obligations, in accordance with the applicable laws.

2.3 Environment and Quality

URBASER especially worries about the care of the environment, its preservation and the respect for nature, and carries its activities in compliance with the best environmental practices. Accordingly, URBASER expects all suppliers, contractors and collaborators to maintain a prevention-based approach that favours the environment and promotes greater environmental responsibility.

All our suppliers:

- Will have an effective environmental policy in place that complies, at least, with all the obligations corresponding to them in accordance with the environmental laws in the countries where they operate.
- Will maintain a preventive approach and promote environmental responsibility initiatives, and have systems that will allow them to identify, supervise and deal with the environmental impact of their activities.
- Will have systems that will guarantee safety in the manipulation, transfer and recycling of waste generated through their activities.
- Will favour the development and dissemination of environmentally friendly technologies.
- Will design production processes that make an efficient use of the available resources and minimise environmental impact.
- Will ensure that all products and services delivered by suppliers meet the quality and safety standards and parameters required by applicable law, with special emphasis on adherence to agreed prices and delivery dates.

2.4 Health and Safety

URBASER is firmly and permanently committed to health and safety at work, as well as to scrupulous compliance with applicable regulations on the matter. This commitment is a core value in the development of its activities.

URBASER expects all its suppliers to have a safe, stable and healthy work environment with a Health and Safety Management System that is updated regularly, introducing preventive measures as established by the legislation in force in each country.

URBASER's suppliers must promote the application of health and safety rules and policies, ensuring that they:

- Oversee the safety of their workers, providing a safe work environment that complies with all health and safety requirements in accordance with international rules and the applicable laws in the corresponding country.
- Have work facilities that guarantee industrial hygiene, lighting and ventilation standards, sanitary facilities and access to drinking water, with safety equipment in case of fire and adequate protection for each and every one of the activities they carry out.
- Identify and assess potential emergency situations at the workplace and minimise them with preventive measures

⁽¹⁾ In those countries where there is no legislation governing the minimum age to work, it will be understood that the minimum age is 15, following the ILO "Minimum Age Convention, 1973".

⁽²⁾ All people between 15 and 18 years of age qualify as young people.

and emergency plans.

- Provide training and tools to their employees to oversee their safety and that of the people around who may be affected during the course of the activities.

3. Supplier Responsibilities

URBASER's suppliers agree to commit to:

- Respect this Code while they are in business with URBASER and ensure their own suppliers also comply with it.
- Take part in the verification activities that URBASER may establish in this Code.
- Implement corrective actions, if necessary, as a result of any verification activities URBASER may have carried out within its organisation.
- Report to URBASER any information they consider relevant in relation to the requirements set out in this Code.

4. Compliance, Assessment and Control

URBASER reserves the right to terminate the contractual relationship with any supplier, contractor and/or collaborator failing to comply with any of the ethical principles herein.

URBASER makes available to all its suppliers and employees thereof a channel to report any irregular practices related to non-compliance or violation of the standards of this Code through filling the form available on the corporate website <https://www.urbaser.com/en/ethics-box/>.

URBASER's Corporate Purchasing Division will manage this "Supplier Code of Ethics" and will be in charge of interpreting any question that may arise in its application, as well as of revising or updating its content whenever it may be necessary.



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