



Supplier Code of Conduct

CEO

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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.

URBASER is inspired by the 10 Principles of the United Nations Global Compact, related to human, labor, environmental and anti-corruption rights, integrating them into its business model, and wants to establish a framework of trust and collaboration with all its suppliers, so that this “Supplier Code of Conduct” serves to establish stable and lasting business relationships based on honesty, ethical behavior, integrity and transparency, with the aim of achieving continuous improvement in procurement 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.

The selection of suppliers and the awarding of purchases in URBASER will be carried out following competitive and transparent procedures in accordance with the procedure established in the Corporate Policy for the procurement of goods and services, available on the Company’s website at this link: [Corporate Policy for the Procurement of Goods and Services.pdf](#).

URBASER promotes that all its suppliers carry out all their activities in compliance with the accepted international agreements regarding Transparency and Business Ethics, Anti-Corruption, Competition Law, Equal Opportunities, Human and Labor Rights, Environment, Quality and Health and Safety.

In accordance with this premise, the values and principles contained in URBASER’s Code of Conduct must be assumed by all its suppliers, in such a way that they are maintained and transferred to their own supply chain.

URBASER expects all suppliers to participate in these basic international principles contained in the “Supplier Code of Conduct” and to transfer it to their own activity and that of their parent companies and subsidiaries, as well as to the rest of the supply chain, so that it becomes an indispensable requirement for the maintenance of present and future business relationships.

Therefore, the company is responsible for complying with and enforcing this Code of Conduct, which is available on the URBASER Intranet and publicly on the Group’s website. [Governance – Urbaser](#), and to report any non-compliance through the Ethics Channel on the Group’s website. <https://urbaser.canaletico.app/>.

2. Principles

2.1 Anti-corruption, Competition, Transparency and Business Ethics

URBASER’s relationship with its Suppliers is based on legality, ethics, integrity and transparency. Thus, it is expected from all suppliers:

- To respect the laws, rules and regulations of the countries where they carry out their activity, without carrying out unethical practices or conduct that may damage the image or reputation of URBASER. Not to admit, under any circumstances, bribes or other illegal incentives.

- Be transparent and honest in all publications of a financial, commercial or business nature that they may issue and, above all, in those in which URBASER is mentioned.
- Manage their companies respecting fair competition and in accordance with the legislation on Competition Law, as well as all the regulations that are applicable to them, so as to allow them to carry out their activity in an ethical manner with respect to their competitors.
- Resolve any conflict of interest presented by any of its employees.
- Respect the principles of confidentiality, so that no information that may have been received as confidential during their business relationship with URBASER will be used or used, unless expressly authorized or for reasons of legal obligation or compliance with any legal or administrative resolution. In addition, they will make sure to protect the privacy of all employees and business partners, as well as the intellectual property rights in force.
- They undertake to comply with the established regulations and the Information Security Policy of URBASER in the management of the Information of their property. 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 ensure the privacy of personal data to which they may have access during their activity.
- Respect the privacy and the right to intimacy of all people with whom they interact, in such a way that they commit themselves to make responsible use of all data and information in accordance with the data protection laws contained in the legislation of each country.
- No supplier may directly or indirectly offer or make payments in cash (or cash equivalent) or in kind or any other kind of benefit to URBASER or any of its employees, or other entities in order to unlawfully maintain business or other advantages or abuse their influence.
- Without limitation, below are the links to the external website where suppliers can consult the most relevant Corporate Policies of application, among others:
 - [Code of Conduct](#)
 - Corporate Sustainability Policy
 - Corporate Anti Money Laundering Policy
 - Corporate Anti-Corruption Policy
 - Corporate Third Party Engagement-Policy
 - [Corporate](#) Antitrust Compliance Policy
 - Corporate Whistleblower Policy
 - Corporate Policy for the Procurement Goods and Services
 - Corporate Sanctions Export Controls Policy
 - Corporate Quality Health and Safety Environment and Energy Policy
 - Corporate Human Rights Policy
 - Corporate Training and Talent Development Policy
 - Corporate Diversity Equality and Inclusion Policy
 - Corporate Digital Disconnection Policy
 - [Corporate](#) Harassment Prevention Policy
 - Corporate RDi Policy
 - Corporate Digital Disconnection Policy
 - Corporate Data Protection Policy
 - Corporate Conflict of Interest Policy

Finally, an information document summarizing the main guidelines on the subject is available to suppliers at the following link <https://urbaser.com/en/proposito/governance/suppliers-training-document/>.

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:

- The Universal Declaration of Human Rights. [Universal Declaration of Human Rights | United Nations](#).
- The Principles of the United Nations Global Compact. [The Ten Principles | UN Global Compact](#)
- ILO (International Labor Organization) Declaration on Fundamental Principles and Rights at Work. [Déclaration OIT E bis.indd](#).
- The OECD Guidelines for Multinational Enterprises, a set of recommendations on responsible business conduct that governments address to multinational enterprises operating in or headquartered in adhering countries, whose main objective is to promote the positive contribution of enterprises to economic, environmental and social progress worldwide. [Untitled Document](#).

Therefore, URBASER expects all its suppliers, contractors and collaborators to develop their activities, always respecting the following points:

- Respect at all times and in each of their activities and locations the fundamental and internationally recognized human rights.
- Maintain a work environment in which all employees are treated with dignity and respect, free from threats of violence, exploitation, verbal, sexual, psychological or psychological harassment or mistreatment, or any other type of conduct that may intimidate or offend the rights of individuals.
- Comply with labor laws and regulations regarding working hours, wages, benefits and working hours, respecting the rights of workers in accordance with the laws in force in each country (minimum wage, overtime pay, vacations, etc.).
- Treat all its employees with due respect, avoiding any conduct that may involve discrimination based on race, religious, political or union ideas, nationality, language, gender, sexual orientation, marital status, age or disability. URBASER expects its suppliers to ensure that their employees are not harassed in any way, providing an inclusive and supportive work environment.
- The use of child labor (1) will be expressly rejected, respecting the minimum hiring ages in accordance with current legislation. Likewise, we shall prevent any young person (2) from performing work that is hazardous to their health or physical, mental, social or moral development.
- Reject and eliminate all forms of forced or coerced labor.
- Respect the freedom of trade union association and the right to collective bargaining of workers, subject to the rules applicable in each case.
- Respect the legal reservation of social hiring of disabled people, in accordance with the legislation in force in each country.
- Value the implementation of reconciliation measures that favor respect for the personal and family life of all employees and facilitate the best balance between this and the work responsibilities of women and men, in accordance with applicable laws.

2.3 Environment and Quality

URBASER has a special concern for the care of the environment, its preservation and respect for the environment, which is manifested in the development of its activity in compliance with the best environmental practices. In this line URBASER expects all its suppliers, contractors and collaborators to maintain a preventive approach that favors the environment, encouraging initiatives that promote greater environmental responsibility.

All our suppliers are committed to:

- To have an effective environmental policy that complies, as a minimum, with all those obligations that correspond to them in accordance with environmental legislation in the countries where they carry out their activities.
- Comply with all legal requirements applicable to their activity in any geography in which they operate and have mechanisms for the identification of new requirements and the supervision of their compliance.
- To diligently inform URBASER of any administrative, civil or criminal proceedings opened for serious non-compliance in environmental matters.
- Maintain a preventive approach that encourages initiatives that promote environmental responsibility, with systems that allow us to identify potential risks to the environment and establish early measures for their elimination or mitigation.
- To have systems in place to ensure safe handling, transfer and recycling of waste generated by its activities.
- Encourage the development and dissemination of environmentally friendly technologies.
- To make efficient use of energy and other raw materials in its processes and services, in order to minimize the environmental impact of its activities.
- Comply with the standards and parameters of quality and safety required by applicable laws in all products and services that are purchased or contracted by URBASER, paying attention to compliance with prices and delivery times.
- Adopt the necessary measures to reduce greenhouse gas emissions (carbon footprint) by establishing objectives and monitoring programs aimed at this end.
- Cooperate in the conservation of biodiversity and the management of different natural resources, implementing measures to avoid, minimize, restore and/or compensate the possible impacts derived from its business activities, acting in an environmentally friendly manner.
- Ensure monitoring and extend its commitments to its own supply chain.

2.4 Health and Safety

URBASER has a firm and permanent commitment to health and safety at work, as well as to scrupulous compliance with all applicable regulations on the subject, so that this commitment is an essential value in the development of its activities.

URBASER expects all its suppliers to have a safe, stable and healthy work environment with an Occupational Risk Prevention Management System that is constantly updated by introducing the preventive measures established in the current legislation of each country.

URBASER suppliers shall:

- Promote and supervise the application of safety and health protection standards and policies in their organization.
- Ensure the protection of all their workers, providing them with a safe working environment that complies with the requirements of occupational risk prevention in accordance with international standards and applicable legislation in the country in question.
- Evaluate the possible risks to people arising from its services or processes, establishing measures to be taken.
- Periodically plan the preventive activities necessary for the protection of the safety and health of people.
- To inform all its workers and those who access its facilities about the risks of the execution of its activities and facilities.

- Provide its workers with the necessary training and means to ensure their own safety and that of other people in their environment who may be affected during the development of the activity.
- Identify and evaluate potential emergency situations in the workplace and minimize them with preventive measures and emergency plans.
- Collaborate in a timely manner with URBASER for the effective coordination of business activities.
- Ensure that their work facilities guarantee industrial hygiene, sufficient lighting and ventilation, sanitary facilities and access to drinking water, with protective equipment in case of fire and for each of the activities they perform.

2.5 Cybersecurity and Data Protection

Suppliers undertake to take into account the following in relation to the protection of personal data and cybersecurity of information and operating systems:

- They undertake to comply with the established regulations and the URBASER Information Security Policy in the management of information and personal data owned by URBASER, as well as comply with all security measures established by URBASER and communicated on its corporate website [Medidas de ciberseguridad de proveedores – Urbaser](#), in order to ensure the confidentiality, integrity, availability, traceability and authenticity of information and systems.
- Provide their employees with the necessary training and means to minimize the risk of a cyber incident or data breach during the development of the activity.
- They must ensure compliance with current regulations on personal data protection applicable in each case. In case of doubt or query, please contact pdp@urbaser.com.
- Within the framework of their relationship with URBASER, those who access personal data will act as data processors and must sign the corresponding data processing and confidentiality contract.
- They must also collaborate with URBASER in complying with the obligations relating to the subject of data, the management of security breaches and the performance of impact assessments when necessary.
- URBASER may audit compliance with these obligations and must provide the necessary information to demonstrate compliance with its obligations regarding data protection or information security.

3. Responsibility of suppliers

URBASER's suppliers are committed to the following:

- Accept and respect this Code, while maintaining business relations with URBASER and ensure that their own suppliers also comply with it.
- To participate in the verification activities of this Code that may be established by URBASER.
- Implement corrective actions, if necessary, as a result of any verification activity that URBASER has carried out within its organization.
- Communicate with URBASER any information they consider relevant in relation to the requirements established in this Code.

4. Compliance, evaluation and control

URBASER reserves the right to terminate the contractual relationship with those suppliers, contractors and/or collaborators who fail to comply with any of the ethical principles contained in this document.

URBASER makes available to all its suppliers and their employees a channel through which any irregular practice related to the non-compliance or violation of the conducts included in this Code must be communicated through the following link: <https://urbaser.canaletico.app/>. The management of this "Supplier Code of Conduct" corresponds to the Corporate Purchasing Department of URBASER, which will be in charge of interpreting any doubts that may arise during its application, as well as proceeding to its revision or renewal when necessary to update it.

5. Training and Dissemination

The necessary training actions will be promoted for the knowledge of this Supplier Code of Conduct. The Chief Executive Officer and the Management Committee will promote and supervise the implementation of this Code of Conduct in all areas of the company.

The Supplier Code of Conduct will be made available to URBASER's stakeholders and interested parties, for their information and knowledge, through publication on the Group's corporate website and will be periodically communicated through the channels provided for this purpose.

6. Breaches

This Supplier Code of Conduct is considered a mandatory rule for all its suppliers, so that its violation will be a breach of this and the Company will take the appropriate disciplinary measures, where appropriate, without prejudice to other responsibilities that the offender may have incurred. Likewise, URBASER reserves the right to take measures it deems appropriate against business partners who violate it.

7. Review and Update

The Corporate Purchasing Department will periodically review the content of this Supplier Code of Conduct, ensuring that it reflects the recommendations and best practices in force for the proper integration of the mission, vision, values and purpose in the Company's strategy and operations. It will also propose modifications and updates that contribute to its development and continuous improvement.



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