



TITLE

CODE OF ETHICS FOR SUPPLIERS

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1. INTRODUCTION

Through its adherence to the United Nations Global Compact, SOLARPACK took on the challenge of gradually implementing in its activities the 10 Universal Principles contained in the Compact.

In this context, SOLARPACK aims to extend its commitment to suppliers, contractors and collaborators in order to establish business relationships that minimise the risk of human and social rights violations, that ensure regulatory compliance and, in particular, that ensure matters relating to ethics and integrity in conduct, all while guaranteeing the supply of goods and services.

SOLARPACK selects its suppliers, contractors and collaborators under the criteria of objectivity, impartiality and non-discrimination, fostering competition and equal treatment, while refraining from conflicts of interest, with the aim of setting a benchmark in compliance with ethical codes and the fight against fraud and corruption.

As such, SOLARPACK is committed to making a positive contribution to society through its activities and it expects its suppliers, contractors and collaborators to collaborate by applying these principles to their own activities.

With this Code, SOLARPACK encourages suppliers, contractors and collaborators to carry out their activities in accordance with best practices, complying with internationally accepted standards regarding transparency and business ethics, human and social rights, health and safety, and quality and the environment.

SOLARPACK undertakes to foster and encourage its suppliers, contractors and external collaborators, without prejudice to compliance with contractual conditions, and under the premise of respect for management authority, to adopt practices in accordance with the guidelines included in this Code.

2. PURPOSE

SOLARPACK, as defined below, considers its suppliers, contractors and external collaborators to be an indispensable part of the achievement of its objectives, seeking to establish relationships with them based on trust and mutual benefit.

This Code of Ethics for Suppliers (hereinafter referred to as the "Code") is intended to establish the minimum guidelines for the conduct of suppliers, contractors and external collaborators in accordance with SOLARPACK's corporate culture and the laws of each of the countries in which it operates.

The Code reflects the principle of due diligence to be applied by suppliers, contractors and external collaborators for the prevention, detection and eradication of irregularities related to breaches of this Code and the internal rules they have established, including those referring to criminal offences. Specifically, it shall comply with applicable legislation on the criminal liability of legal persons.

3. SCOPE

This Code is geared towards all suppliers, contractors and external collaborators involved in business relations with SOLARPACK CORPORACIÓN TECNOLÓGICA, S.A., or with any of the companies in which it has a direct or indirect shareholding (hereinafter referred to as "Solarpack Group" or "SOLARPACK").

Compliance is independent of where in the world these suppliers, contractors and collaborating companies operate, without prejudice to compliance with the existing institutional and legal framework of each country.

The criteria of conduct contained in this Code do not envisage all situations or circumstances that suppliers, contractors and external collaborators of the Solarpack Group may encounter, but rather they entail general conduct guidelines to orientate them on how to act in the course of their professional activity.

4. GUIDING PRINCIPLES FOR THE CONDUCT OF SOLARPACK SUPPLIERS

SOLARPACK expects its suppliers, contractors and external collaborators to behave with integrity and responsibility in the performance of their duties.

Integrity is understood as acting ethically and honestly. Professional responsibility is understood as acting efficiently and with a focus on excellence.

SOLARPACK, therefore, expects its suppliers, contractors and collaborators to:

- Respect the laws, rules and regulations of the countries in which they operate.
- Not engage in unethical practices or conduct that, while not violating the law, may damage SOLARPACK's reputation.
- Not engage in actions that compromise or jeopardise legality and fundamental ethical principles.
- Respect the principles of confidentiality, not using or sharing information that they have received as confidential during their business relationship, unless they have been authorised to do so by SOLARPACK or on the grounds of legal obligations or compliance with judicial or administrative decisions.
- Have the necessary means to guarantee the privacy of the personal data to which they have access in the course of their activity.
- Comply with the highest standards of ethical and moral conduct, refraining from practices involving corruption in all its forms, including extortion and bribery.
- Not offer, directly or indirectly, any payment in cash or in kind to SOLARPACK, or to any of its employees or other entities, with the intention of unlawfully obtaining or retaining business or other advantages.

5. CONDUCT GUIDELINES

5.1 Respect for legality and ethical values

All suppliers, contractors and external collaborators must comply with the laws in force in the countries where they carry out their activities, in accordance with their spirit and purpose, and act ethically in all their actions.

Likewise, suppliers, contractors and external collaborators must avoid any conduct that, even without violating the law, could damage SOLARPACK's reputation in the eyes of the community, the country's government or any other body, and/or negatively affect its interests.

Suppliers, contractors and external collaborators must act with honesty and integrity in all their agreements and transactions with the authorities and officials of the different governments and administrations, ensuring that all the information and certifications they submit, as well as the declarations they make, are truthful.

All suppliers, contractors and external collaborators must know and respect the laws that affect their work.

No supplier, contractor or external collaborator shall knowingly collaborate with third parties in violation of any law, nor participate in any action that compromises compliance with this legal principle.

Suppliers, contractors and external collaborators shall provide the necessary means for their employees to be aware at all times of the external and internal regulations relevant to the functions they perform, and they shall establish the necessary internal control models to ensure compliance with the law and ethical values.

5.2 Respect for human rights

Suppliers, contractors and external collaborators must respect the internationally recognised human rights proclaimed by the United Nations General Assembly in the Universal Declaration of Human Rights.

The responsibility of suppliers, contractors and external collaborators to respect human rights requires them to prevent their own activities from causing or contributing to adverse human rights impacts and to address such impacts when they occur, as well as to seek to prevent or mitigate adverse human rights impacts directly related to operations, products or services provided by their suppliers, contractors and external collaborators.

The responsibility of suppliers, contractors and external collaborators to respect human rights includes, but is not limited to:

- Maintaining working practices with its employees that are consistent with the international standards described above.
- Eliminating all forms of forced labour.

- Eradicating the use of child labour.
- Respecting the freedom of association and collective bargaining of its employees.
- Treating all employees with dignity and respect, refraining from any conduct that is offensive or involves any form of discrimination or physical or psychological harassment on the grounds of religious, political or trade union beliefs, race, nationality, language, gender, marital status, social origin, age or disability.
- Ensuring that working conditions and the working environment (inter alia: recruitment, wages, working hours, maternity protection, promotion of a safe, alcohol-free and drug-free working environment, access to training, promotion, career development, equal opportunities, contract termination or retirement, etc.) are consistent with applicable international labour standards. They must also comply with the labour legislation in force in each of the environments in which they operate in terms of working hours and the right to rest.
- Recognising and respecting the rights of individuals belonging to vulnerable groups when the supplier's activities take place in areas inhabited by these groups.

5.3 Use and protection of assets

Suppliers, contractors and external collaborators shall use SOLARPACK's resources responsibly, efficiently and appropriately in the context of their professional activity. They must also protect and preserve them from any improper use that could be detrimental to SOLARPACK's interests.

SOLARPACK does not permit the use on the equipment it provides to suppliers, contractors and external collaborators of illegal software or IT applications that may damage its image or reputation or to access, download or distribute illegal or offensive content.

5.4 Corruption and bribery

SOLARPACK's suppliers, contractors and external collaborators, in their relations with third parties and, in particular, with public authorities and institutions in the various countries where they operate, shall act in a manner consistent with national and international provisions for the prevention of corruption and bribery.

SOLARPACK declares to be against influencing the will of people outside the company to obtain any benefit through the use of unethical practices. Nor will it allow other persons or entities to use such practices with their employees.

SOLARPACK's suppliers, contractors and external collaborators shall establish mechanisms to combat all forms of corruption and bribery in the course of their activities. This includes, but is not limited to:

- Not making or offering, directly or indirectly, any payment in cash, in kind or any other benefit, to any natural or legal person in the service of any public or private authority or entity, political party

or candidate for public office, in order to unlawfully obtain or maintain business or other advantages.

- Not making or offering, directly or indirectly, any payment in cash, in kind or any other benefit, to any natural or legal person so that they abuse their real or apparent influence to obtain from any public or private authority or entity any business or advantage.
- Not making or offering, directly or indirectly, any payment in cash or in kind or any other benefit, to any natural or legal person when it is known that all or part of the money or in-kind payment will be offered or given, directly or indirectly, to any public or private authority or entity, or political party or candidate for public office, for any of the purposes mentioned in the two previous paragraphs.
- Not making payments for facilitating or speeding up processes, consisting of the handing over of money or anything else of value, whatever the amount, in exchange for securing or accelerating the course of a process or action before any judicial body, public administration or official body.
- Specifically, the supplier shall not make, offer or accept in contracting with SOLARPACK, any payment in cash, in kind or any other benefit from/to any natural or legal person, in order to obtain or maintain any business or advantage for itself or a third party, which could give rise to a conflict between the interests of the supplier or the third party and those of SOLARPACK.

5.5 Irregular payments and money laundering

Suppliers, contractors and external collaborators must adopt measures to prevent money laundering in financial transactions, both collections and payments, as well as remain alert to signs of a lack of integrity of persons or entities with which they maintain relations.

5.6 Corporate image and reputation

SOLARPACK's suppliers, contractors and external collaborators must take the utmost care to preserve SOLARPACK's image and reputation in their professional actions. They shall also safeguard the respect for and correct and appropriate use of SOLARPACK's corporate image and reputation by its employees and subcontracted companies.

5.7 Conflict of interest

Suppliers, contractors and external collaborators shall avoid situations that may give rise to a conflict between the personal interests of their managers or employees and those of SOLARPACK. Furthermore, they shall maintain mechanisms that, in the event of a potential conflict of interest regarding any of their managers or employees, guarantee the independence of the actions of the supplier, contractor or external collaborator and their full compliance with the applicable legislation.

Managers and employees of suppliers, contractors and external collaborators shall inform SOLARPACK if they or their close relatives are themselves employees of SOLARPACK.

5.8 Defence of competition

Suppliers, contractors and external collaborators shall avoid situations that could give rise to practices contrary to the applicable defence of competition or antitrust rules (price fixing, bid rigging, collusive behaviour, etc.) and, in any case, they must be scrupulous in complying with any regulations or recommendations related to said defence or antitrust.

5.9 Information and knowledge processing

Suppliers, contractors and external collaborators declare the truthfulness of information as a basic principle in all their actions, and must therefore truthfully transmit all the information they have to communicate, both internally and externally, and under no circumstance shall they knowingly provide incorrect or inaccurate information that could mislead the recipient.

All suppliers, contractors and external collaborators who enter any type of information in SOLARPACK's computer systems must ensure that this information is rigorous and reliable.

Suppliers, contractors and external collaborators are obliged to preserve the integrity and confidentiality of the information they receive as a result of their business relations with SOLARPACK.

Suppliers, contractors and external collaborators who have confidential information about SOLARPACK, or about important aspects of the company's strategy, policy, plans or assets, shall preserve it so that it cannot be used inappropriately and refrain from using it improperly for their own benefit or for the benefit of third parties.

Furthermore, there must be clear communication with SOLARPACK's representatives and the information provided by the supplier to SOLARPACK within the framework of their relationship shall be truthful and accurate.

The obligation of confidentiality shall continue beyond the termination of the relationship with SOLARPACK and it shall include the obligation to return any company-related material in the possession of the supplier, contractor or external collaborator.

Suppliers, contractors and external collaborators must comply with the data protection legislation in force in each country, respecting the right to privacy and protecting the personal data entrusted to them by third parties.

SOLARPACK's suppliers, contractors and external collaborators must protect the intellectual and industrial property of SOLARPACK and others, including, but not limited to, patents, trademarks, domain names, copyrights (including software copyrights), design rights, database extraction rights or rights to technical know-how. Suppliers, contractors and external collaborators, in their relations with third parties, shall strictly follow the rules and procedures in this area in order to avoid infringing the rights of third parties.

5.10 Occupational health, safety and hygiene

Suppliers, contractors and external collaborators shall adopt the preventive measures established in the legislation in force in each country on occupational health, safety and hygiene, and shall at all times ensure compliance with regulations in this area and shall not allow unsafe behaviour that could cause harm to people and/or facilities. The commitments they undertake, which includes, but is not limited to the following:

1. Ensuring that health and safety is a non-delegable responsibility, which through visible commitment is led by top management and assumed in a proactive and integrated manner.
2. Establishing health and safety as an individual responsibility that conditions the employment of its workers, as well as the activity of its collaborating companies.
3. Ensuring that any potential risk situation that could affect its workers, customers, the public and the safety of the facilities is reported, assessed and managed in an appropriate manner.
4. Integrating demanding health and safety criteria in business processes, as well as in the selection and evaluation of suppliers and collaborating companies, whose non-compliance conditions the start or continuance of the activity.
5. Providing the necessary resources, means, equipment and materials to enable compliance with the safety standards established at all times.

In particular, when carrying out their activities in SOLARPACK facilities, suppliers, contractors and collaborators must be aware of and ensure that their employees comply with SOLARPACK's occupational and workplace health and safety policy, as well as with the health, safety and environmental regulations that apply to them.

5.11 Respect for the environment

Suppliers, contractors and external collaborators shall maintain a constant commitment to environmental protection and comply with the standards and requirements set out in applicable local and international legislation. They will also commit to comply with the environmental standards set by SOLARPACK.

5.12 Quality and safety of products and services

The products and services delivered by suppliers, contractors and external collaborators shall comply with the quality and safety standards and parameters required by applicable laws, paying special attention to compliance with prices and delivery deadlines.

Suppliers, contractors and external collaborators must have and/or use installations and machinery in good condition to carry out the activities and products under the corresponding contract. In this regard, the machinery and equipment used by suppliers, contractors and external collaborators must comply with the applicable legislation and standards in force, especially in the areas of quality, safety and the environment.

6. ACCEPTANCE AND ADHERENCE TO THE CODE

SOLARPACK shall communicate and disseminate the content of this Code to its suppliers, contractors and external collaborators. Furthermore, it will also be published on the SOLARPACK website.

Suppliers, contractors and external collaborators shall formally undertake to comply with this Code when they start working for SOLARPACK, when they novate contracts and whenever SOLARPACK deems it appropriate given the circumstances.

In the event that the supplier, contractor or external collaborator has in place and publicly available (e.g., on its website) policies or a code of ethics or conduct containing commitments identical or similar to those presented in this Code, the formal commitment to comply with this Code may be replaced by the provision of a copy of the public commitments made by the supplier, contractor or external collaborator.

Suppliers, contractors and external collaborators shall establish adequate mechanisms for the effective dissemination of this Code among their employees, especially those working for SOLARPACK.

In turn, suppliers, contractors and external collaborators shall be responsible for ensuring that their own suppliers and subcontractors are subject to principles of conduct equivalent to those of this Code, for implementing corrective actions, if necessary, as a result of any verification activity carried out by SOLARPACK in their organisation, for communicating to SOLARPACK any information they consider relevant in relation to the requirements set out in this Code and they shall participate in any verification activities of this Code that SOLARPACK may establish.

Suppliers, contractors and external collaborators undertake to allow SOLARPACK to carry out periodic audits to verify compliance with this Code, and to proactively provide the relevant complete and truthful information.

7. BREACH OF AND NON-COMPLIANCE WITH THIS CODE

Failure by the supplier to comply with the contents of this Code may have different consequences for the contractual relationship with SOLARPACK.

Depending on the seriousness of the non-compliance, these may range from a mere warning, up to disqualification as a supplier of the Solarpack Group or even the resolution or termination of the contractual relationship with just cause and without the supplier, contractor or external collaborator being able to claim any amount from SOLARPACK; without prejudice to other legal or administrative actions that may be applicable and the damages that SOLARPACK may claim.

All suppliers, contractors and external collaborators of SOLARPACK agree and are obliged to confidentially contact, in good faith and without fear of reprisal, the SOLARPACK Whistleblower Channel to report any breach of the guidelines of this Code that they observe in their professional practice or in the professional performance of any of their subcontractors and/or suppliers. This communication can be made by email to denuncias@solarpack.es

Communications made to the Whistleblower Channel will be treated confidentially by SOLARPACK and will be processed in accordance with the provisions of current legislation on data protection.

8. APPROVAL, UPDATING AND COMMUNICATION

This Code is approved by the Board of Directors. Its review and supervision is the responsibility of the Audit and Compliance Committee, which will also ensure its compliance and periodically review it for ongoing suitability.

This Code is communicated and understood within the scope of the organisation and all interested parties can access it through the information and communication channels that the Company makes available to all its stakeholders.