

# SUPPLIER CODE OF CONDUCT

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EFFICOLD applies a “zero tolerance” policy in regard to unethical behavior in business, such as bribery and corruption and forced labor. We expect all our suppliers to adhere to similar standards and conduct their business ethically.

As a provider, you must comply with all applicable laws and regulations, the requirements set forth in this EFFICOLD Supplier Code of Conduct and your contractual obligations to us.

This EFFICOLD Supplier Code of Conduct defines the most important principles on which your business should be based as one of our suppliers.

#### A. Human rights

As an EFFICOLD supplier, you must:

- • respect the personal dignity, privacy and rights of each individual;
- • refuse to make anyone work against their will; and
- • forbid improper speech, gestural or physical contact behavior that is sexual, coercive, threatening, abusive or exploitative.

#### B. Fair working conditions

You will guarantee fair working conditions. Specifically you

- avoid discrimination in employment based on sex, age, race, nationality, religion, disability, union or political affiliation or sexual orientation;
- respect the rights of employees to freely associate and collective bargaining;
- will not tolerate or use child labor in any of its activities, except in cases allowed under applicable law;
- will not employ forced labor, such as involuntary work of inmates, or victims of slavery and trafficking in human beings and will allow all employees the freedom to leave the company after reasonable notice;
- pay employees fairly and will comply with local salary regulations and / or collective agreements and, when these do not exist, pay employees so that, at least, they can meet their basic needs;
- ensure that the working day, including overtime, does not exceed the applicable legal requirements and, when these do not exist, we recommend that the working day does not exceed sixty hours per week including overtime; Y
- ensure that employees enjoy at least one uninterrupted day of rest a week.

#### C. Healthy, safety and environment.

You will provide safe and healthy jobs to all your employees and conduct your business in an environmentally sustainable manner. Specifically you

- • formally appoint a competent person to manage health, safety and environmental programs and improvements;
- • establish appropriate organizational structures and processes for the effective management of health, safety and environmental risks; Y

- ensure that all workers are sufficiently aware of these risks and are trained in the implementation of control measures.

#### D. Regulatory compliance and conflict minerals

At EFFICOLD, we are determined to comply with legal and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and conflict minerals. Therefore, suppliers will ensure that the goods supplied to EFFICOLD comply with the requirements established under the scope of all applicable regulations. Specifically you

- implement a policy regarding conflict minerals and carry out due diligence to investigate the origin of those minerals; Y
- respond to EFFICOLD requests in a timely manner on the evidence of its compliance with those requirements.

#### E. Business Ethics

You will develop your activity ethically. Specifically you

- refrain from all forms of corruption, extortion and bribery, and specifically ensure that payments, gifts and other invitations to customers (including EFFICOLD employees), public employees and any other party comply with anti-bribery regulations applicable;
- protect all confidential information provided by EFFICOLD and our respective business partners;
- respect the intellectual property of third parties including that of EFFICOLD; and will comply with international trade and export control regulations.
- It will not influence the personal beliefs of your staff. Specifically, the Buyer dissociates itself from any political or religious activity that incites extremism or jeopardizes our commitment to cultural diversity and equal opportunities. The Buyer expects that the employees of its suppliers have the same right.

#### F. Business security

You will conduct your business safely. Specifically you

- respect the safety procedures and report any security problems to the appropriate EFFICOLD channels, when visiting or working at the EFFICOLD facilities.

#### G. Supplier Supplies

You will provide goods and services responsibly. Specifically you select its first-order suppliers ("tier one") that directly or indirectly provide goods or services to EFFICOLD on the basis that they adhere to standards comparable to those established in this EFFICOLD Supplier Code of Conduct; and will subcontract only with the prior consent of EFFICOLD when working at the EFFICOLD facilities.

#### H. Inspections and corrective actions

In order to guarantee and demonstrate compliance with the EFFICOLD Supplier Code of Conduct, you must keep all relevant documentation and provide us with supporting documentation upon request.



To verify compliance, we reserve the right to audit and inspect your operations and facilities, at our cost and at reasonable notice, with or without the support of a third party. If the result of said audit or inspection makes us think that it does not comply with the EFFICOLD Supplier Code of Conduct, you must take the necessary corrective actions in a timely manner, according to our indications. If you violate this EFFICOLD Supplier Code of Conduct, we may take action against you, including the suspension or termination of your activities as our provider.

#### I. Access to corrective measures

Within the framework of our commercial activity, if you or your employees consider that the terms of this EFFICOLD Supplier Code of Conduct are not complied with, or that EFFICOLD is not acting in accordance with its own Code of Conduct, we encourage you to raise your concerns through the mail of our social manager [e.gavilan@efficold.com](mailto:e.gavilan@efficold.com).