

# ETHICS CHARTER

FOR SUPPLIER COMPANIES

greenalia  
The Green Company



Greenalia's Headquarters

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## Introduction

Our supply chain is made up of suppliers, contractors and external collaborators who assist us in the planning and execution of the projects we develop in our different lines of business and with whom we establish relationships based on trust, impartiality, objectivity and transparency. In order to inform them of the behavioural guidelines that should govern their relations with Greenalia, we have approved this Ethics Charter.

This Charter (hereinafter referred to as "the Ethics Charter" or "the Charter") has been drawn up on the basis of our Code of Conduct and good corporate practices and is in line with the principles of the UN Global Compact, to which we are a signatory. By accepting it, the persons bound by it commit themselves to strict observance of its contents and to the categorical refusal to commit unlawful acts in the course of our dealings. The Charter is without prejudice to the conditions and requirements that may

additionally be established by law and/or the various contracts or orders entered into between Greenalia and the persons subject to it.

In order to ensure the understanding and acceptance of the Charter, we ask recipients to sign a document created for this purpose. Furthermore, in order to ascertain their performance on certain sustainability or ESG (Environmental, Social and Governance) issues, we ask them to fill out a specific form.

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## Scope of application

The Ethical Charter is addressed to suppliers, contractors and external collaborators who maintain business relations with Greenalia, S.A., with its subsidiaries or with companies in which it has direct or indirect effective control (hereinafter, "Greenalia" or the "organisation"), regardless of the place in which they operate.

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## Respect for legality and ethical behaviour

Our suppliers, contractors and external collaborators must respect the laws, rules and regulations applicable in the territories where they carry out their activities and observe ethical behaviour in all their activities.

Minón Wind Farm (24MW)



04

## Reputation

The persons subject to this charter must avoid any type of behaviour which, even if not in breach of the law, may damage or compromise Greenalia's reputation or affect its interests.

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## Quality and safety of products and services

All the products or services that Greenalia's suppliers, contractors and external collaborators deliver or provide must comply with the quality and safety standards and parameters required by the applicable legislation and by the agreements signed between the parties, with special attention to compliance with the agreed prices and delivery deadlines.

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## Working environment

At Greenalia, we expect our suppliers, contractors and external partners to:

- not tolerate forced or compulsory labour either in their own organisation or in the companies they work with.
- support the elimination and reporting of child labour in all its forms.
- defend freedom of association and trade union freedom, the right to collective bargaining and social dialogue.
- establish real equality, eliminating any discrimination in employment and occupation on the grounds of sex, sexual orientation, ideology, race, ability, culture, religion or any other personal or social condition.
- reject the use of corporal punishment and all harassing behavior, abuse of authority, offence

or other conduct which, because of its aggressiveness or hostility, is conducive to a climate of intimidation.

- support and respect, in general, all fundamental human rights and never be complicit in their violation.
- comply with the current legislation on foreign nationals and recruitment with regard to foreign personnel assigned to the execution of contracts with Greenalia.
- respect the minimum wage and maximum working hours established by labor regulations and industry standards.
- promote a decent quality of life for their personnel.

Greenalia's Headquarters

# 07

## Use and protection of assets

The suppliers, contractors and external collaborators who, in the course of a relationship with Greenalia, have access to assets that are its property or at its disposal, must only use them for the use for which they have been authorised and use them responsibly, in accordance with the security protocols and other instructions that they receive, safeguarding them with the utmost care, to conserve them and make the best possible use of them and taking the necessary precautions to prevent their loss or theft. They must also immediately report any faults, deterioration or irregularities that they notice in their operation, so that they can be repaired or replaced.

In the case of IT equipment and systems, they must be aware that at Greenalia we monitor and analyse them to ensure their correct functioning, guarantee the continuity of our operations, and avoid any type of abuse or fraudulent use. It is forbidden to use them illegally or contrary to our regulations, especially to gain unauthorised access to other people's computer systems, interrupt their operation or delete, damage or alter the information they contain. Neither may illegal software or software not authorised by the organisation be installed on them.

# 08

## Integrity

### 8.1 Bribes and facilitation payments

At Greenalia we do not tolerate any form of corruption and we expect our suppliers, contractors and external collaborators to maintain, at all times, a conduct of integrity and reliability and that, in their commercial, professional or administrative relations with Greenalia, with other companies, persons or entities, public or private, and with authorities, political parties or trade unions:

- they do not offer, deliver, solicit or accept, directly or through intermediaries, gifts or favours of any kind that entail a material or moral advantage for the recipient or supplier
- they do not make facilitation payments, directly or indirectly, for the purpose of expediting administrative procedures and formalities to which they have a legal right.

### 8.2 Gifts and hospitality

Our suppliers, contractors and external collaborators should be aware that at Greenalia we only accept gifts or hospitality of symbolic or economically irrelevant value given in a transparent manner as part of a generally accepted business practice or social courtesy and provided that they do not violate the applicable legislation in each country or this charter. Under no circumstances will we accept gifts in the course of negotiating or renewing contracts or agreements with persons subject to the contents of this charter.



### 8.3 Conflicts of interest

We expect our suppliers, contractors and external collaborators not to use their relationship with Greenalia to obtain advantages (commercial, patrimonial, personal or of any other kind) and to avoid situations (personal, family, friendship or economic) that could lead to a conflict of interest with us, in particular:

- direct or indirect links to persons employed by Greenalia involved in the specific business relationship
- the participation of former Greenalia employees who have gone on to work for the supplier.

Persons subject to this charter must report any situation or well-founded suspicion of conflict of interest through the Responsible Channel (see section 15).

### 8.4 Due diligence measures

Our suppliers, contractors and external collaborators must take the necessary measures to know the third parties involved in their supply chain, ensuring that they do not expose them to risks that could affect their integrity and/or reputation.

## Health, safety, and the environment

Greenalia seeks to work with suppliers, contractors and collaborators who:

- are committed to establishing the highest standards of safety in their business processes, facilities, services and products
- provide their staff with the best health and safety conditions, regularly assessing the risks to which they are exposed, informing and training them and establishing protective measures and resources that are appropriate to the risks identified
- respect applicable environmental regulations and minimise the impact of their activity on the environment, avoiding unnecessary pollution or

physical alterations and favouring the conservation of biodiversity and the sustainable management of resources.

- integrate safety, health and environmental criteria into the selection processes of their own suppliers, contractors and external partners.



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## Fair competition

Our suppliers, contractors and collaborators must act fairly in the market, respecting free competition for the benefit of consumers and users, complying with the established rules and with the mandates and recommendations of the supervisory bodies. At Greenalia we do not tolerate unfair or abusive practices, the negotiation of anti-competitive agreements or, in general, any restrictive activity contrary to competition law.

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## Transparency and accuracy of information

We expect the persons subject to this letter to:

- never offer, by any means, biased, misleading, fraudulent or malicious information, either of its own or related to Greenalia or its environment.
- be up to date with their tax and social security obligations and not to engage in conduct aimed at unlawfully evading the payment of amounts owed to these authorities
- not use their organisations for money laundering or for channelling funds or resources to persons or entities linked to terrorist groups or organisations, by adopting the necessary measures and internal controls to minimise cash payments
- ensure the identity, appropriateness and provenance of all their financial transactions and capital movements.

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## Confidentiality and protection of personal data and information security

We require our suppliers, contractors and external collaborators to protect and maintain in the strictest confidence the non-public information owned or under the custody of Greenalia to which they have access as a result of the relationship with us, which will be considered confidential and which they must keep in the strictest confidentiality and, under no circumstances, disclose, disseminate or use for their own benefit or that of third parties, or use it for unauthorised purposes, unless they are legally obliged or authorised to do so. In the case of information containing personal data, in addition to obtaining it, they must also process, store, conserve and use it in the manner and form established by law.

Any queries on this matter should be submitted to the following e-mail address:

[lopd@greenalia.es](mailto:lopd@greenalia.es).

In order to ensure the integrity, availability and confidentiality of the information owned by or available to Greenalia that they host, the persons subject to this charter must subject their infrastructure, systems and media, whether digital or paper-based, to a rigorous regime of use, protection and preservation.

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## Industrial and Intellectual Property Protection

The persons subject to this charter must have sufficient intellectual and industrial property rights with respect to any works or goods, their own or those of third parties, that they use for the execution of the contracts that link them to Greenalia and must respect the intellectual or industrial property rights that we use in our daily work, especially, the ownership and rights of use and exploitation of software and computer systems, equipment, telephones, computers, storage devices, electronic mail systems and access to internet or databases, internal and external, manuals, videos, projects, studies, reports and other works and rights created, developed, perfected or used in the performance of our work.

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## Responsibility

Greenalia's suppliers, contractors and external collaborators, during their relationship with the organisation, will be responsible for:

- respecting the principles set out in this Ethical Charter, informing of its content and demanding compliance with it from the company's partners, its administrators, its management, its personnel and/or any other related persons subject to its control or determining influence.
- ensuring that its own suppliers, contractors and external collaborators linked to contracts with Greenalia act in accordance with the contents of this charter
- collaborating with Greenalia by providing it with the information and documentation which, where appropriate, it may require in order to accredit compliance with this charter and/or to investigate possible breaches of the same.

Any supplier company that does not comply with the contents of this letter, in addition to damaging its own image, assumes the risk of incurring liabilities with Greenalia and of having its business relations with Greenalia reduced or discontinued.

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## Responsible Channel

If any of our suppliers, contractors and external collaborators are aware of conduct that may imply a possible breach of this Ethical Charter, they must report it through the online Responsible Channel, accessible on the corporate website. They can use this tool with full guarantee of confidentiality and without fear of reprisals, even anonymously, if they so wish. The channel can also be used to raise doubts about the content of this charter or any other document that forms part of Greenalia's Regulatory Compliance Programme.

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## Approval

This Charter shall enter into force when, after its approval by the Board of Directors, it has been communicated to the persons subject to its contents.



# ACCEPTANCE OF THE ETHICAL CHARTER FOR GREENALIA'S SUPPLIER COMPANIES

Please complete this form and return it signed to the e-mail address from which you received the Charter:

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## THE UNDERSIGNED PERSON

*Indicate the name of the person signing the document*

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## ACTING AS

*Indicate their post*

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## OF THE ORGANISATION

*company name*

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Acknowledges having been made aware of all the provisions of Greenalia's Ethical Charter and undertakes to comply with it, during its relationship with Greenalia, and to ensure that its own staff or those of its suppliers, contractors and external collaborators linked to contracts with Greenalia, are aware of it and comply with it. It also declares that the company's partners,

its administrators, its management, its staff and/or any other related persons subject to its control or determining influence:

- are not involved in any actual, potential or apparent conflict of interest (financial, family or emotional, professional or other) with Greenalia or its staff.
- are involved in the following conflict of

interest situation(s) (financial, familial or emotional, professional or other) with Greenalia or its personnel:

Please indicate the type of conflict (actual, potential and apparent) and the persons involved:

Signature and stamp

In....., on the..... of.....

# SUSTAINABILITY ASSESSMENT QUESTIONNAIRE

Please complete this form and return it signed to the e-mail address from which you received the Charter:

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## A. THE ORGANISATION

NAME

TAX ID

NATIONAL BUSINESS ACTIVITY CODE (CNAE)

ADDRESS

BUSINESS AREA/ACTIVITY

NUMBER OF WORKERS

TOTAL ANNUAL TURNOVER

GREENALIA CONTRACTING DEPARTMENT

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## B. B. PERSON COMPLETING THE QUESTIONNAIRE

NAME AND SURNAME

POSITION

TELEPHONE

E-MAIL



SUSTAINABILITY  
ASSESSMENT  
QUESTIONNAIRE

D. ENVIRONMENTAL

Do you have an environmental policy that includes a commitment to legal compliance, continuous assessment and continuous improvement of environmental performance?

Do you have environmental certifications? Detail standard(s), entity(ies) and date(s) of certification. E.g. EMAS registration or ISO14001 certification.

Do you have a CDP rating for the last 12 months? If yes, please indicate the rating on climate change, water and forests.

Do you have any pending disciplinary proceedings for breaches of environmental regulations? (if so, please describe)

Do you have procedures in place to identify and manage restricted substances?

Has your company established sustainability (ESG) requirements with regard to suppliers?

What processes do you have in place to ensure effective implementation by suppliers of your sustainability requirements (ESG)?

- Self-assessment questionnaires.
- Audits carried out by the company.
- External audits carried out by a certified body.
- Meetings with suppliers.
- None
- Other (please specify):

Do you have a policy on responsible sourcing of raw materials?

Have you identified solutions for the end-of-life of products (Circular Economy)?

Does your company account for GHG emissions and have reduction targets set? (For example with SBTi).

# SUSTAINABILITY ASSESSMENT QUESTIONNAIRE

## E. SOCIAL

Do you have an Equality Plan?

Do you have a sexual and workplace harassment prevention protocol?

Do you participate in voluntary initiatives on corporate social responsibility and sustainability? If yes, please indicate which ones you are involved in.

For which of the following labour and human rights issues does your company have a policy?

- Human Rights
- Freedom of association and collective bargaining
- Occupational health and safety
- Equality, diversity and inclusion
- Digital/workplace disconnection

Do you carry out risk assessments and comply with current occupational health and safety legislation?

Do you comply with the provisions of the General Law on the Rights of Persons with Disabilities and their Social Inclusion regarding the reservation of positions for persons with disabilities?

Do you ensure that all workers are addressed equally without discrimination of any kind?

Do you respect and guarantee the labour rights of all workers and compliance with current legislation/collective bargaining agreements, in relation to wages, working hours, working time, overtime?

# SUSTAINABILITY ASSESSMENT QUESTIONNAIRE

## F. GOVERNANCE

Do you have a sustainability department?

Do you have annual objectives and activities in line with the areas covered in the sustainability policies? Sustainability Plan, Roadmap, etc.

Do you have a Code of Conduct?

Do you have a regulatory compliance officer or committee?

Do you have a Complaints Channel?

Do you have policies on business ethics (anti-corruption, transparency, compliance, risk management, fair competition and anti-trust, etc.)? If yes, please indicate which ones.

Do you publish an annual report on Non-Financial Information (Sustainability Report)?

- No
- Yes, in line with the requirements of the Global Reporting Initiative (GRI).
- Yes, in line with other generally accepted regulations (the following):

Is your most recent report verified by a third party?

Do you organise training sessions to improve understanding of sustainability and compliance?

Do you reject corruption in all its forms, including extortion and bribery?

Are you a member of any international CSR initiatives, such as the Global Compact, etc.?

Answer only if you are a listed company.  
Do you belong to any sustainability index? DJSI, FSE4GOOD, etc.

## REVISION LOG

VERSION	DATE	MODIFICATION
1.0	02/12/2021	Approval of the document by the Board of Directors

ACCIONISTAS E  
INVERSORES

JUNTA GENERAL DE ACCIONISTAS 2021

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The Green Company

# ETHICS CHARTER

FOR SUPPLIER COMPANIES

[www.greenalia.es](http://www.greenalia.es)