

SUPPLIER'S

CODE OF CONDUCT

ETHICS & COMPLIANCE

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Message to our suppliers

At Sonaca España, we consider ethics and integrity as fundamental principles intrinsic to our DNA. We are convinced that the starting point for sustainability is the definition and defence of a solid system of values based not on opportunity, but on the need to maintain ethical and responsible management in all its aspects. A value system that strikes a balance between business results and how to achieve them.

This balance between performance and form, embodied in our Code of Ethics and Conduct, is only possible through global collective action and the commitment of the entire value chain. Because as companies, we are not isolated entities, but participants in a large society to which we belong and which we influence. For this reason, we are certain that suppliers, subcontractors and collaborators are a key and essential element.

Within this framework and as an extension of the aforesaid Code of Ethics and Conduct, we are pleased to present the Suppliers' Code of Conduct, through which Sonaca España encourages and promotes the adoption, throughout the value chain, of the highest standards of responsibility in its actions.

The principles set out in the Suppliers' Code complete and complement the conditions and requirements imposed by local, national and international standards, with those others that Sonaca España voluntarily integrates as part of its corporate culture. These principles include, among others, the commitments derived from the United Nations Global Compact, to which Sonaca España is formally adhered and encourages all suppliers to subscribe.

In doing so, we go beyond strict compliance with the rule, assuming that **each of us has an obligation and responsibility to act ethically**



and to comply with the law, the Code and good practice.

We expect all employees to share and assume the principles and values contained in this Suppliers' Code, extending this commitment in turn to their own employees. This will be the driving force that will allow us to generate an environment of collaboration, understanding and mutual trust and the only way to continue advancing along the path of sustainability.



Scope of application

The Suppliers’ Code of Conduct (the “Suppliers’ Code) sets out the minimum expectations of conduct that Sonaca España expects from all members of its value chain.

Therefore, it applies **to any third party** with whom Sonaca España maintains, **or has initiated discussions to maintain**, a business relationship (hereinafter, “Supplier”), regardless of the way in which the same is instrumented (collaboration agreement, commercial contract, etc.), its nationality and the place/s in which the activity that is the object of the business relationship is carried out.

For the purposes of this Suppliers’ Code, “third parties” is to be understood in a broad sense, including suppliers, subcontractors, agents, consultants, advisors or any other nature.

Likewise, it is applicable to all subcontractors, of any nature, with whom the Supplier relates for the fulfilment of the commercial relationship established with Sonaca España, and the Supplier is obliged to transfer its content and ensure its compliance.

Compliance with the Supplier Code is an essential criterion for the selection and evaluation of the members of Sonaca España’s supply chain.



The Suppliers’ Code of Conduct sets out the minimum expectations of conduct that Sonaca España expects from all members of its value chain

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Guiding principles of conduct

The Suppliers' Code describes the **basic and minimum standards of ethical, social and environmental conduct**, aligned with the Principles of the United Nations Global Compact and all the normative acquis that develops them, which Sonaca España expects all Suppliers to adopt and promote. This is without prejudice to the fact that they, in turn, have their own policies and procedures, governed by the same spirit.

The guiding principles set out in the Suppliers' Code are not intended to cover all situations that suppliers may encounter, but to establish an ethical framework for action and common responsibility.

2.1. Human rights and labour practices

At Sonaca España, we are fully aware that all actions must be governed by respect for the **individual characteristics and dignity of people**. For this reason, we publicly support the content of the Universal Declaration of Human Rights and the International Labour Organisation, and we also subscribe to the Ten Principles of the United Nations Global Compact.

Sonaca España expects all Suppliers (i) to scrupulously protect and respect internationally recognised human rights (International Bill of Human Rights, conventions that develop it, as well as recommendations of the International Labour Organisation) and (ii) to include in their practices behaviours in line with them.

In particular, Suppliers shall promote and respect the following principles:

- They shall prevent and ensure that **no child labour** or any form of exploitation of children is used, at any stage of their activities, in line with the standards set by the ILO, and shall respect the minimum ages of employment in accordance with the applicable legislation in each country.
 - They shall prevent and ensure that no **slavery, servitude, forced or compulsory labour**, violence, exploitation or trafficking in persons takes place in their organisation or in their supply chain.
 - They shall not permit **coercion or intimidation** of workers through verbal abuse, physical abuse or discipline, threats or any form of harassment.
 - They shall put in place the necessary measures **to ensure that all persons are treated with fairness and respect** and to prevent conduct that could lead to **discrimination** in access to employment and career advancement, remuneration, treatment or other status on the grounds of, but not limited to, race, nationality, sex, gender identity, age, religious, political or sexual orientation, marital status or social origin.
- Similarly, they shall prevent and act immediately, where appropriate, against any abusive, humiliating or offensive behaviour or behaviour that could be qualified as physical, psychological, sexual or other types of **harassment**.
- They shall establish an **open and constructive dialogue** with their employees and their representatives, respecting their **right to associate freely**, to join trade unions, to be members of works councils and to participate in collective bargaining, without any form of discrimination, intimidation or reprisal, in whatever form it may take, arising from the exercise of these rights.

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- Guarantee **adequate employment** for all workers, ensuring that the work performed is based on a legally recognised **employment relationship** and in the course of which their right to **rest** and working hours and **remuneration** in accordance with applicable wage laws and agreements is guaranteed.



2.2. Occupational health and safety



Within labour relations, Sonaca España is committed to protecting the health and safety of its employees, and expects Suppliers to assume the same commitment, guaranteeing the well-being at work of the members of its company.



Suppliers shall provide a safe and healthy working environment and develop a suitable and sufficient Safety Management System that, as a minimum: (i) identifies, evaluates and manages risk situations in the workplace; (ii) defines the obligation to implement preventive, detective or reactive controls to eliminate or reduce them, where appropriate, and; (iii) contains mechanisms to provide regular training and information to its employees.

In the same vein, Suppliers shall provide their employees with the necessary means for the performance of their duties with the appropriate hygiene and safety measures to protect them against any chemical, biological, physical or other risk.

These measures shall include standards, elements and means for waste management, treatment of emissions and discharges, and handling and disposal of chemicals and other hazardous materials, if used.

Additionally, when all or part of the activities to be carried out by Suppliers are performed at Sonaca España's facilities, they must ensure that the personnel assigned to them are aware of and comply with the applicable regulations.

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2.3. In the development of its business: relationship with Sonaca España and with third parties

Sonaca España assumes ethics and integrity as essential pillars in the development of its activity, serving as a basis for its way of acting and relating to third parties.

Therefore, it expects its Suppliers to act within a framework of equivalent values, enabling the establishment of sustainable relationships, based on the following principles:

1. Transparency and integrity of information:

Suppliers shall maintain honest, upright and transparent behaviour in their activity.

Relations with other companies and with regulatory bodies or public administrations shall be approached in accordance with the principles of cooperation and transparency, ensuring that all information, declarations and certifications submitted are truthful.

In the same vein, Suppliers shall strictly follow accounting standards and principles and shall keep records of all their documentation and documentation relating to their relationship with Sonaca España in a due, truthful and complete manner.

The same requirements shall apply to the commercial, financial and/or business information that Suppliers provide to Sonaca España.

2. Business integrity and fair competition: fight against fraud and corruption:

Sonaca España maintains a "zero tolerance" policy towards any form of corruption, in the broadest sense, and expects Suppliers not to practice or tolerate any of the behaviours in which it may manifest itself (bribery, extortion, fraud, swindling, facilitation payments, etc.; public or private, national or transnational).



In this regard, Suppliers must comply with the laws, directives and other regulations that apply to the performance of their obligations and activities in their relationship with Sonaca España. Without limitation, they undertake to observe the following:

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Business integrity and fair competition:
fight against fraud and corruption:

1

Not to offer or accept, in the context of the activity carried out for or on behalf of Sonaca España, to any authority, public official in general or third party external to the Company, any type of **undue advantage, make illegal payments or other types of offers or benefits**, nor to incur in situations through which it is intended, could be intended or could obtain favourable treatment of any type or that could affect the impartiality and objectivity of the commercial relationship.

Benefits include, but are not limited to, the provision of personal services, job offers, travel, preferential treatment, special discounts or anything else of value.

2

Do not offer **gifts, invitations and/or acts of hospitality** to Sonaca España employees.

As an exception, in the event of wishing to make a service, gift or invitation to Sonaca España employees and provided that they are not in a bidding process or open negotiation, Suppliers must take into account Sonaca España's Gifts and Hospitalities Guide, which sets, among other parameters, a limit, in general terms, of 50 euros or equivalent local currency. In the event of wishing to make a permitted hospitality or gift, it must be made with absolute transparency, without in any case being used to obtain an undue competitive advantage and never at the home address of the Sonaca España employee.

3

Not to obtain, or attempt to obtain, for himself or herself or through anyone else, an advantage of any kind by acting fraudulently, by deceit, by misrepresentation or by allowing another person to do so.

4

To prevent its employees from incurring, could incur or could be perceived as such, in situations of **conflict of interest** with the interests of Sonaca España, maintaining the appropriate mechanisms for the management of such situations and preserving objectivity and impartiality.

5

Establish security and control mechanisms to ensure that its resources come only from lawful activities, that payments are made in accordance with the usual payment system and that its commercial relations are established with persons and entities that provide adequate information on the above and comply with regulations on the **prevention of money laundering and the financing of terrorism**, paying special attention to any signs of activities that could be related to the same and reporting them through the appropriate channels.

6

Promote internal training and awareness of its employees in the prevention and fight against corruption and fraud.

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3. Fair competition and free competition

Suppliers will compete fairly and comply fully with antitrust and competition laws. In this regard, they will behave ethically towards their competitors and will not encourage or engage in improper business practices or actions that unduly or illegally restrain trade or competition or manipulate bids with their competitors, seeking to protect confidential information, recent or future, with competitors (including such information and prices).

4. Responsible sourcing: Conflict minerals:

Suppliers shall guarantee compliance with the regulations applicable to the direct and indirect sourcing of minerals such as tin, tantalum, tungsten and gold; the so-called "Conflict Minerals", ensuring their responsible sourcing and providing Sonaca España with the necessary and sufficient information to guarantee traceability of their origin.

5. Export Control: dual-use and/or military-use material:

Suppliers shall observe the provisions of the national and international regulations applicable to the export and/or import of products, technologies, knowledge and information subject to dual-use or military control; and shall have the necessary licences for the development of their relationship with Sonaca España.

Without prejudice to any other obligation, Suppliers shall correctly classify the products they deliver to Sonaca España, providing complete, truthful and accurate information about them; and shall refrain from contracting with entities and/or subjects sanctioned by virtue of these regulations and from operating in countries subject to embargoes.



“
Sonaca España maintains a "zero tolerance" policy towards any form of corruption, in the broadest sense, and expects Suppliers not to practice or tolerate any of the behaviours in which it may manifest itself
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2.4. Product and Operational Safety and Quality

At Sonaca España, we firmly pursue the objective of achieving the highest levels of customer satisfaction, which translates, in turn, into a strong active commitment to aviation safety, ensuring compliance with all the rules and regulations in force in this regard and maintaining an attitude of cooperation with the Aeronautical Authorities in matters of Operational and Product Safety.

Therefore, it expects its Suppliers to contribute to the same extent, reporting to Sonaca España any type of risk or danger that affects or could affect them, in order to be analysed and evaluated, thus contributing to the maintenance of the demanding standards required in this area.

Suppliers shall guarantee at all times that, in their relationship with Sonaca España, the products delivered and the services provided comply with the legally and contractually established quality parameters, both from the point of view of processes and final results, as well as with any other requirement agreed with Sonaca España. In this line, Suppliers shall have adequate measures in place to prevent, detect and mitigate that products do not incorporate parts or materials suspected of being fraudulent / counterfeit.

In the development of its activity, Sonaca España also promotes a "Just Culture" policy. This culture encourages the identification and voluntary reporting of risks in operations, processes and products, not seeking to blame employees for their actions, omissions or decisions when they are consistent with their experience and training, as long as there is no gross negligence, intentional violations or destructive acts. Sonaca España expects its suppliers to foster a similar culture, in a way that encourages cooperation and involvement of all.



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2.5. Use and protection of Sonaca España’s assets

Sonaca España’s property and assets, both tangible and intangible, have an essential value for the development of its activity. Suppliers shall ensure that, regardless of their nature, they use these assets in any case in an appropriate manner and for the fulfilment of the Company’s legitimate purposes and interests.

In the event that Suppliers use material assets of Sonaca España or third parties for the execution of the object of the commercial rela-

tionship with the Company (goods, supplies, computer equipment, etc.), they shall act responsibly and ensure that they are used by duly authorised persons and for the purposes for which they have been provided, establishing protection measures equivalent to those they maintain to protect and safeguard their own assets.

In relation to intangible assets, Suppliers shall observe the following principles:

• **Reputation and corporate image:** Sonaca España’s assets include its reputation and corporate image. Suppliers shall avoid situations that involve or may involve an impairment or risk to them, caused by both their employees and their subcontractors. Any use by the Supplier of Sonaca España’s image, logo or brand must be priously authorised by Sonaca España.

• **Confidential Information:** Suppliers shall protect, not disclose and shall make appropriate use, in accordance with the purpose for which it was provided, of the information of Sonaca España, its customers and/or any other third parties to which they have access within the framework and by virtue of their relationship with Sonaca España, including the phases prior to the same; maintaining its secret and/or confidential nature. In the same vein, they shall limit access to such information to members of their organisation who have a need to know it for the fulfilment of that purpose. To this end, Providers shall implement such security measures as they deem necessary or merely appropriate to ensure that information of all types is adequately protected in accordance with its nature and level of risk.

Any type of communication, internal or external, that Suppliers make using confidential information of Sonaca España or third parties to which they have had access within the framework of their relationship with the Company, must be previously authorised by Sonaca España.

• **Industrial and Intellectual Property:** Suppliers shall ensure the protection of intellectual and industrial property rights, both of Sonaca España and its customers and of other third parties to which they have access within the framework of the relationship with Sonaca España, complying with the legislation in force in each country. In particular, if Suppliers use material devices, machinery, equipment and/or patented procedures, or, in general, any kind of intellectual or industrial property belonging to third parties, they shall have the corresponding licence from their owners.

• **Privacy and protection of personal data:** Suppliers shall guarantee the privacy of the personal data of Sonaca España members, customers or other suppliers or third parties, to which they have access within the framework of the relationship with Sonaca España, avoiding any use of the same that is unrelated to the purposes of the same, both during its validity and once it has ended. The processing of such personal data must be covered by any of the legitimate bases provided for by law and shall respect the principles of treatment provided for in the applicable regulations.

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2.6. Environmental sustainability

Sonaca España is fully aware that, as members of society, its activity can have an impact on the environment. Therefore, it carries out its activity in accordance with an Environmental Management System designed in accordance with international standards and is committed to the implementation of sustainable business practices to minimise this impact.

Along the same lines, it asks its Suppliers to adopt criteria of respect and environmental responsibility and to integrate environmental considerations in all phases of the development of their activity, guaranteeing compliance with regulations and managing and minimising the negative impacts that may derive from their activity. Suppliers must extend these commitments to their own value chain, thus fostering environmental

awareness and promoting the establishment of mechanisms for the environmental improvement of their activity.

In line with this spirit of environmental sensitivity, Sonaca España expects its Suppliers to (i) actively manage environmental risks in their operations, in their products and in their own supply chain, ensuring that their activities have the least possible environmental impact; (ii) commit to the gradual decarbonisation of their operations, through the appropriate assumption of objectives, goals and strategies and (iii) make a responsible and efficient consumption of resources.



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Responsability of suppliers

Compliance with this Code is mandatory for all Sonaca España Suppliers. The provisions herein are understood to be without prejudice to the additional conditions and requirements established in the corresponding legislation, in the regulations of the different jurisdictions where Sonaca España and the suppliers carry out their activities and in the contracts formalised with each Supplier.

The acceptance and due compliance with the Supplier Code is essential for the maintenance of the relationship with Sonaca España, in such a way that the Supplier undertakes to:

- Comply with and ensure that all employees who participate, directly or indirectly, in the business relationship with Sonaca España, are aware of and comply with the provisions of this Code and the external and internal regulations that affect their activity with Sonaca España.
- To have management systems that, adapted to its context, ensure compliance with applicable laws and the expectations that Sonaca España sets out in this Code, providing for the implementation of appropriate measures to detect and act against the risks of non-compliance.
- Collaborate with audits and investigations carried out by Sonaca España or third parties entitled to do so, proactively providing full and truthful information that may be necessary or reasonably required.
- Communicate to Sonaca España in good faith, through the E&C Channel, any non-compliance, suspected non-compliance or other relevant information regarding this Supplier Code.

- Ensure that any subcontractor assumes values equivalent to the provisions of this Code, thus guaranteeing full integrity in the supply chain; and communicate to Sonaca España any refusal to do so.
- Immediately inform Sonaca España in the event that they are involved in legal proceedings that could affect Sonaca España, from a financial and/or reputational point of view.

Non-compliance by the Supplier with the Suppliers' Code may have a negative impact on Sonaca España and may lead to the adoption of measures of various nature depending on the seriousness of the non-compliance, from a warning to the proposal of corrective action plans, suspension and/or termination of the contractual relationship, without prejudice to other legal or administrative actions that may be applicable.



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E&C Channel

Sonaca España provides all Suppliers with a confidential channel through which they must report, in good faith, any irregularity, non-compliance or suspected non-compliance with the provisions of this Code ("E&C Channel"). Access to E&C Channel shall be through the Company's website: www.sonaca.com and through the following QR code.



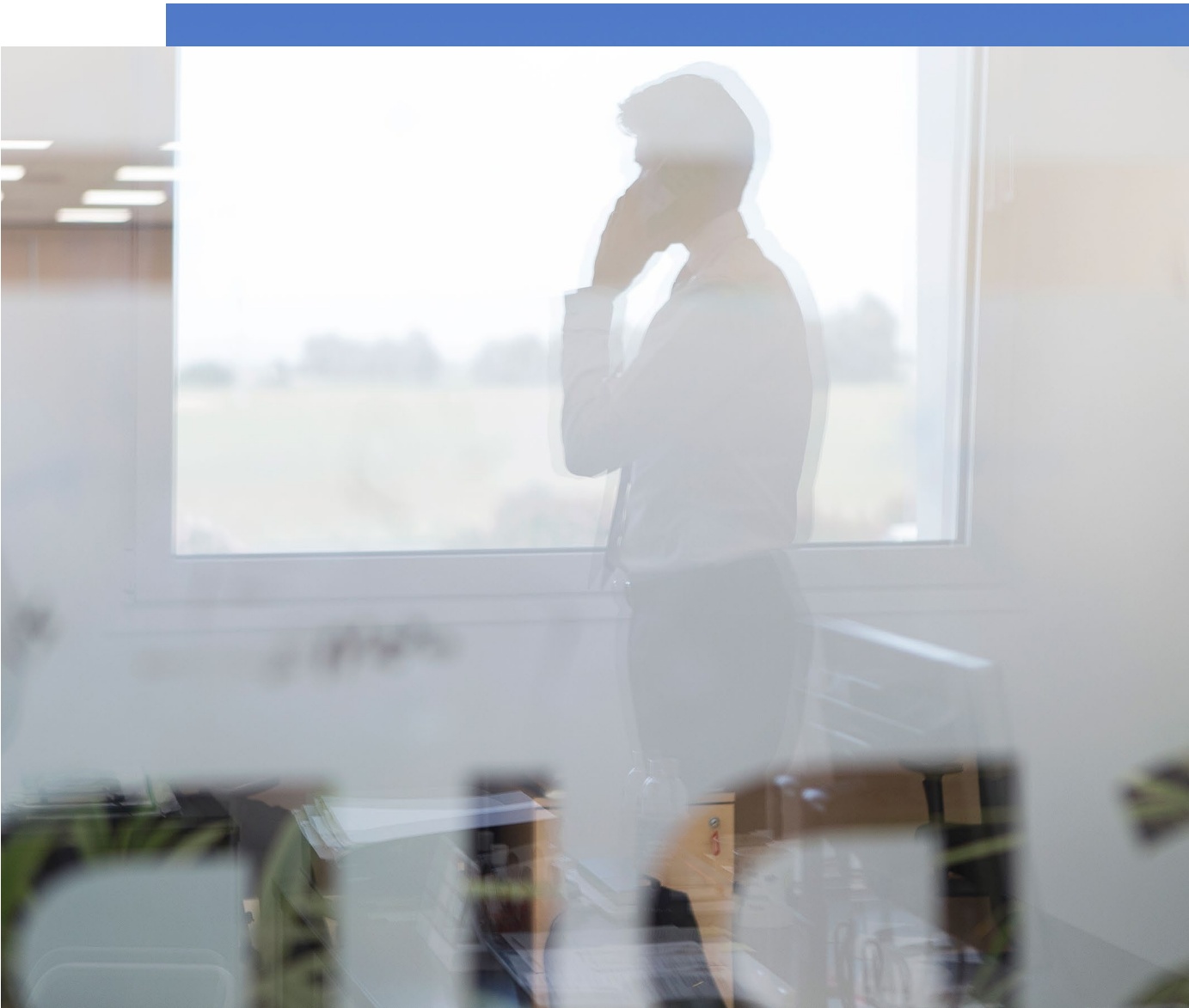
Communications made through E&C Channel must always comply with criteria of truthfulness and good faith, and may not be used for purposes other than those that pursue compliance with this Supplier Code or with the legislation in force.

Good faith communication involves providing information in an honest, complete and accurate manner, acting in the rational belief that the facts or indications are true, even if it is later found to be wrong.

Communications will be treated by Sonaca España's Ethics and Compliance Department with scrupulous respect for confidentiality, objectivity and absence of value judgements and guarantee of the rights of the persons involved, in accordance with the provisions of its E&C Channel Policy.

Sonaca España expressly prohibits the adoption of any type of retaliation against anyone who, in good faith, reports possible irregular behaviour or against those who may collaborate in the investigation; and, in

the same vein, requires Suppliers to adopt a similar non-retaliation policy. Suppliers may also make use of the E&C Channel to communicate, on the basis of the same principle of good faith, any suggestions, doubts and/or queries they deem appropriate in order to contribute to the continuous improvement and mutual benefit of their relationship with Sonaca España.



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Validity, updating and dissemination

This Supplier Code was approved by the Board of Directors on 26 June 2024, with formal and terminological amendments subsequently incorporated, effective from 1 July 2026. It comes into effect upon approval.

The content of the Supplier Code shall be adapted, updated and revised periodically; the version in force at any given time shall be available to Suppliers on the Sonaca website.

Sonaca España's internal regulations referenced in the Supplier Code are available on the Sonaca website.



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Supplier Commitment

All Suppliers shall formalise their commitment to comply with the Supplier Code of Conduct by signing the following "Letter of Commitment":

"Sonaca España is firmly committed to maintaining the highest standards of ethics and integrity in its actions and professional relationships, as the basis for building and maintaining a solid and sustainable business relationship.

Within this framework, Sonaca España publishes this Suppliers' Code of Conduct, as an extension of its Code of Ethics and Conduct, which establishes the minimum guidelines for ethical, social and environmental conduct that all suppliers must know and adopt in order to collaborate with Sonaca España.

The Supplier expressly undertakes to know and comply with the principles contained in the Supplier's Code, to extend its content to all its employees and members of its supply chain who participate in any way in the relationship with it, and to ensure compliance by all of the above.

Acceptance of the contents of the Supplier's Code is understood in any case in its entirety and without any kind of reservation.

Supplier's commitment will cover the commercial relationship that it maintains with Sonaca España globally considered, being incorporated into any business practice that is carried out within its framework. Failure to comply with the provisions of the same may have different

consequences depending on their seriousness, and may lead to the termination of the business relationship or the review of its qualification as a supplier of Sonaca España".

Supplier's name

Name and position of authorized representative

Signature and date

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