



SUPPLIER CODE OF CONDUCT AND ETHICS

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INTRODUCTION

PRISA and its group companies (hereinafter, “PRISA”) consider their suppliers (entities or persons that deliver goods or services) to be key when it comes to meeting company financial and non-financial objectives. PRISA therefore endeavors to ensure that all current and potential suppliers are aware of and have access to its Code of Ethics (available at www.prisa.com), the aim being to foster the adoption of minimum standards of conduct consistent with said Code.

This Supplier Code of Conduct and Ethics:

- Seeks to establish a framework of ethical principles of action for cooperation and mutual benefit while maintaining the autonomy of each party.
- It does not exempt the supplier from its legal responsibilities and the exercise of good practices.

SCOPE

All PRISA suppliers are expected to show a commitment to informing themselves about this Code and undertake to:

- Respect and comply with it while they are a PRISA supplier.
- Facilitate and co-participate in any verification or due diligence process that PRISA carries out in order to evaluate PRISA-supplier relations, including after the commencement of the provision of goods or services. Suppliers also agree to make improvements if required.
- Maintain proactive communication with PRISA on all aspects related to requirements as set out in this Code.
- Promote and oversee ethical behavior consistent with the principles of this Code among their own suppliers and all those companies with which they have a contractual relationship.

PRINCIPLES OF ACTION

The Supplier Code of Conduct and Ethics establishes specific guidelines in the following areas:

1. Current legislation
2. Human and labor rights
3. Business ethics and anti-corruption measures
4. Environment
5. Confidentiality and privacy

VALIDITY

This Code shall become effective on October 25, 2022, after its approval by the PRISA Board of Directors, and its duration shall be indefinite.

1. CURRENT LEGISLATION

PRISA suppliers must comply with applicable laws in the countries in which they operate, and, moreover, they must make every effort to avoid any conduct that, even while legal, may be ethically reprehensible and thus compromise PRISA's reputation or have unfavorable repercussions for either PRISA or its companies. In the event that the supplier has to weigh contradictory obligations, it must opt for solutions that will allow it to ensure compliance with internationally recognized standards in the area of Human Rights.

2. HUMAN AND LABOR RIGHTS

A commitment to respecting Human and Labor Rights includes (but is not limited to) the following implications for a PRISA supplier, who agrees to:

- Comply with all applicable local, national and international laws and regulations with regard to labor practices, worker benefits, health and safety and anti-discrimination practices, in all those countries in which they operate or carry out their business activity, avoiding, at all times, any action that does not comply with applicable labor standards.
- Recognize freedom of association, trade union freedom and the right to collective bargaining, in accordance with the current legislation of the country in which they carry out their activity.
- Avoid discrimination at work and in employment for reasons of identity, gender, race, ethnicity, origin, nationality, creed, religion, political opinion, affiliation, age, sexual orientation or identity, status, disability and other situations protected by law.
- Avoid being complicit in any form of violation of Human Rights. Suppliers also commit to the elimination of forced and compulsory labor, and the effective abolition of child labor. They will not hire minors under the minimum legal working age, in accordance with the applicable local or national legislation and, in no case, shall they hire anyone under the age of 15 (or the age established in this regard by C138, ILO Minimum Age Convention).
- Prevent any practice that involves threats, coercion, force or any type of intimidation, retaliation or abuse of power for the purpose of exploitation and forced labor of workers.
- Promote equal opportunities between employees of different genders, in accordance with the laws and the agreements signed with workers' representatives. Likewise, suppliers shall ensure that a work environment is provided that is free from all forms of harassment and/or offensive or inappropriate behavior and other actions that may violate personal or professional dignity.
- In addition to complying with the minimum legal and regulatory requirements with regard to working conditions, PRISA suppliers will provide workers with a safe and healthy work environment, in strict compliance, at all times, with the health and safety laws in force in each country where they are located.

3. BUSINESS ETHICS AND ANTI-CORRUPTION MEASURES

Suppliers will conduct their operations with integrity and transparency, guided at all times by a principle of zero tolerance for any corrupt or unethical practices.

The actions of PRISA suppliers must always be governed by the highest ethical standards and good commercial and business practices in their relations with both public and private entities, and they must ensure the protection of free competition and regulatory compliance.

Suppliers will establish mechanisms to combat all forms of corruption and in order to ensure ethical and transparent conduct in those countries in which they operate.

4. ENVIRONMENT

PRISA expects its suppliers to make every effort to minimize the impact of their activity on the environment, and to set ambitious goals in this regard, while promoting measures that combat climate change and that foster respect for biodiversity.

Our suppliers will guarantee at all times that the product or service provided complies with the environmental protection requirements set by the applicable laws, rules and regulations.

5. CONFIDENTIALITY AND PRIVACY

PRISA is committed to information security and the protection of personal data. The Group therefore requires its suppliers to safeguard the confidentiality of all information entrusted to them and to refrain from using it for illegitimate or unauthorized purposes, whether for their own benefit or that of third parties.

PRISA requires its suppliers to adequately protect and refrain from revealing any data or document of a strategic, financial, technical or commercial nature that has been communicated to them by PRISA and that is not in the public domain. Likewise, all information, whether professional or private, relating to natural persons must be protected, using all necessary preventive measures to avoid its alteration and/or disclosure.

This confidentiality obligation will remain in force even after the termination of commercial relations between the supplier and PRISA.

PRISA does not grant authorization, under any circumstances, to suppliers to make their relationship with PRISA public or to use the PRISA brand without prior written consent. Should such consent be granted, suppliers must respect all the instructions and indications set out by PRISA.

NON-COMPLIANCE

The consequences of violating the stipulations of this code of conduct will have consequences for the supplier's contractual relationship with PRISA and these will depend on the seriousness of the breach: from a verbal or written warning to disqualification as a PRISA supplier, without prejudice to other legal or administrative measures that may be applicable.

An anonymous whistleblowing channel has been made available to suppliers by PRISA (accessible at www.prisa.com) through which instances that may be considered illegal or irregular may be reported, as well as instances that may be classified as violations or breaches of either this Supplier Code of Conduct and Ethics or the Code of Ethics for PRISA employees.