

# Code of Ethics and Conduct

For suppliers and third  
party intermediaries



# ZeLeStra



### Objective

This Code of Ethics defines the basic requirements placed on suppliers, contractors, external collaborators and third parties which act as intermediaries of Zelestra Corporación S.A.U. (Zelestra) concerning their responsibilities towards their stakeholders, society and the environment. Zelestra reserves the right to reasonably change the requirements of this Code of Ethics and Conduct due to changes of the Zelestra ethics and compliance model. If that is the case, Zelestra deems the updated editions of the Code of Ethics and Conduct, available on its official website, as accepted without requiring additional signatures from supplier, contractor, external collaborator and/or third party intermediary.

This Code of Ethics was approved by the Board of Directors on September 19, 2023, and is effective since its approval.



## Commitments

The supplier, contractor, external collaborator and/or third party acting as an intermediary shall comply with the laws of the applicable legal systems, respect the Ten Principles of the UN Global Compact and the Universal Declaration of Human Rights, comply with the stipulations contained in this Code, as well as undertake to:

- Participate in compliance verification activities of this code, maintain an open and regular dialogue and/or audits that may be established or required by Zelestra.
- Implement the corrective actions, if necessary, resulting from any verification activity or evaluation performed.
- Notify Zelestra of any information considered relevant regarding the requirements set forth in this Code, which could directly or indirectly affect Zelestra legally, economically or reputationally. As well as to notify Zelestra of any investigation, audit, evaluation or unusual request related to Zelestra or the work being carried out.
- Report, in good faith, any concerns or suspected violations of this Code or any information you consider relevant to the standards and requirements contained in this Code to the Ethics Line <https://zelestra.integrityline.com/>
- Disseminate the Code among its employees and companies with which it maintains an active contractual relationship for the provision of services to Zelestra.

Non-compliance by the supplier, contractor, external collaborator and/or third party intermediary with what is contained in this Code may have consequences in the contractual relationship with Zelestra.



# 1

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## Human & Labour Rights



## Human Rights

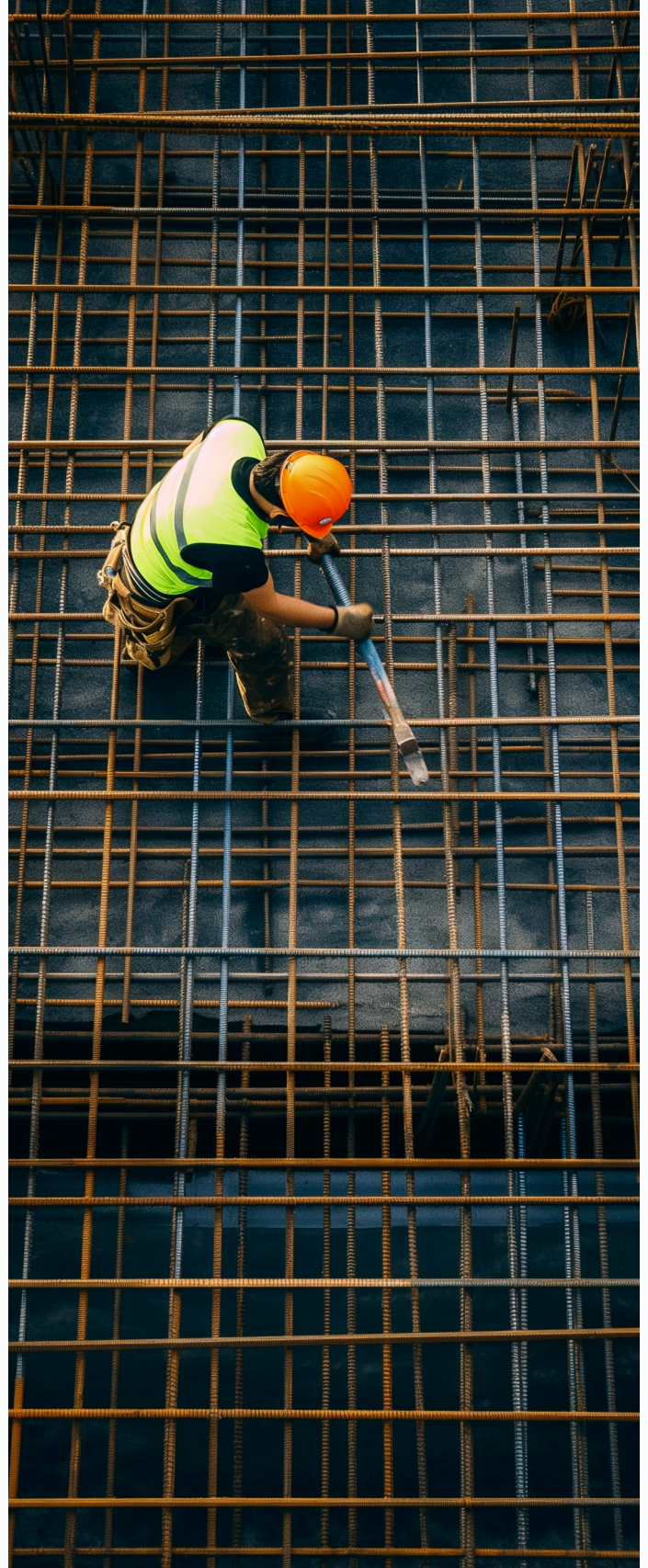
- Respect the protection of internationally proclaimed human rights and avoid complicity with its abuses.
- Respect the dignity, privacy and personal rights of each individual.
- Help foster economic and social development of local communities and ensure full respect for the rights.
- Promote equal opportunities and treatment of employees, irrespective of skin colour, race, nationality, language, ethnicity, political or union affiliation, social background, disabilities, sexual orientation, marital status, religious conviction, gender, or age.
- Refuse to tolerate any unacceptable behaviour harassment or degrading treatment including mental cruelty or sexual harassment, gestures, language, and physical contact of a sexual, coercive, threatening, abusive, or exploitative nature.

## Occupational Health & Safety

- Act in accordance with the applicable statutory and national and international standards regarding occupational health and safety and provide safe working conditions.
- Establish a reasonable occupational health & safety management system.
- Provide training to ensure employees are educated in health & safety issues and have the right to refuse unsafe work.

## Labour Rights

- Avoid all forms of forced and compulsory labour and refuse to employ or make anyone work against their will.
- Contribute to the eradication of child labor, refraining from hiring minor workers, also avoiding that any minor perform dangerous work or that interferes with their education or physical, mental, moral and social development.
- Recognize, as far as legally possible, the right of free association and collective bargaining.
- Comply with the maximum number of working hours and remunerate overtime in accordance with applicable legislation.
- Provide fair remuneration and guarantee the applicable national statutory minimum wage.



# 2

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## Integrity

## Corruption & Bribery

- Maintain zero tolerance for any form of corruption, extortion, or bribery.
- Forgo directly or indirectly offering, granting, requesting or accepting anything of value to government officials or to a counterparty in the private sector with intentions to influence official action or obtain an improper advantage.

## Value chain

- Comply with the principles of non-discrimination with regard to supplier selection and treatment.
- Notify and promote using reasonable efforts among its suppliers compliance with this Code of Ethics.
- Conduct appropriate due diligence on third parties to ensure the integrity of the value chain, taking into account the activity, origin, and governmental interaction of the third party.

## Conflicts of interests

- Avoid any conflict of interest that may negatively affect business relationships.

## Quality

- Guarantee at all times that the product or service supplied complies with the quality standards set out in the applicable laws, rules and regulations and all aspects set out directly in the contract with Zelestra.



## Competition

- Act in accordance with national and international competition laws and refrain from participating in price fixing, market or customer allocation, market sharing, or bid rigging with competitors.

## Money laundering

- Take measures to prevent money laundering, both in receipts and payments.

## Transparency

- Keep their books, records and financial statements accurate and transparent at all times.
- To refrain from using artificial or opaque structures unrelated to their own activities.

## Sanctions

- Avoid any transaction, activity or conduct that could reasonably be expected to result in their classification as a sanctioned person by any of the following states or institutions UN, USA (OFAC), UK (HMT) or European Union.
- Do not have business or other relationships with companies or persons subject to sanctions or located in countries affected by international sanctions aforementioned.



# 3

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Our assets and those  
of third parties



- Use our resources and the resources of third parties in a responsible, suitable, and efficient manner.
- Ensure the confidentiality of information accessible to them due to their relationship with Zelestra while carrying out their professional duties, including personal data, sensitive business information, and privileged information.
- Implement the necessary information security measures that ensure that both the digital information contained in their systems and that of a documentary type present adequate protection based on their level of confidentiality.

- Respect Zelestra's intellectual and industrial property rights, as well as the intellectual property rights of their own and any third parties associated with them.
- Exercise the utmost care in maintaining Zelestra's professional image and reputation and ensure appropriate and ethical conduct by both their employees and contractors in order to use the company's image responsibly and appropriately.

# 4

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## Environmental protection





- Act in accordance with the applicable statutory and international standards regarding the environment.
- Establish a reasonable environmental management system.

- Take reasonable efforts to avoid in its products the use of raw materials that come from, directly or indirectly, areas, groups or organizations in which Human Rights are infringed.

•••••<sup>•</sup> Zelestra