



# Gonvarri Material Handling

## Code of Conduct for suppliers

This Code of Conduct for Suppliers shows our support for the United Nations Global Pact, the defence of Human Rights and our commitment to Sustainable Development Goals. In addition, it defines the criteria and mandatory requirements, which, in accordance with the policies and principles governing Gonvarri Industries working standards, must be observed.

Gonvarri Material Handling requires its suppliers to comply with all their obligations and with the standards in regulatory compliance in all areas, health and safety, human rights, trade sanctions compliance, anti-corruption and environmental protection, among others. We invite our suppliers to collaborate to jointly improve our management of these areas, and also to promote these standards through their own supply chains.

Gonvarri Material Handling invites its suppliers to accept the following principles of conduct based on respect, ethical behaviour and sustainability:

- Comply with any regulation, restriction or legislation in any area, either international or national, applicable in the countries the company operates in.
- Comply with all the agreements and commitments, at an international or national level, in the jurisdictions in which it operates, including compliance to the principles defined in the Global Pact.
- Not to tolerate or practice any form of corruption or bribery, including any payment or other type of benefit for the purpose of influencing the making of a decision that is outside the lawful uses of the market.
- Have fair and transparent award negotiation mechanisms. Compete honestly, in compliance with competition rules, without gathering information on markets and/or products in a consensual manner with competitors, nor using privileged information.
- Respect the personal dignity and rights of all individuals, treating all employees with dignity and respect, pursuing and avoiding any type of abuse, sexual harassment or intimidation.
- Promote equal opportunities and not establish any type of discriminatory practice for hiring or in working conditions, based on race, religion, nationality, age, disability, gender, marital status, sexual orientation and/or union or political affiliation, or any other personal or social circumstance.
- Not to carry out any work with employees or collaborators who are minors, considering the applicable legislation in the countries in which it operates or, as the case may be, the requirements established by international organizations such as the ILO. If legislation allows work at ages under 18 years, special care will be taken with this group avoiding work that might mean any risk to their health and development.
- Guarantee compliance with labour legislation and the right to free association, affiliation and collective bargaining and the free performance of functions, in compliance with the applicable legislation in each jurisdiction, avoiding involuntary, forced labour and human trafficking.

- Foster respect for the human rights of the employees, in a safe and healthy work environment, with adequate safety management, guaranteeing proper conditions for safety and hygiene, as well as the measures necessary to prevent accidents, damage and occupational illnesses for own and subcontracted workers. Similarly, appropriate occupational health and safety training and information shall also be provided.
- Carry out its business activity minimizing its environmental impact as much as possible, complying with the legal requirements and protection of the environment. Likewise, adequate training and information are provided with regard to environmental protection.
- Establish the necessary measures for the protection of intellectual property rights, confidentiality in the information and data derived from their relationship with Gonvarri Industries.
- Verify that no purchases are made from sources that are present or that use minerals that come from areas affected by high risk conflicts, such as the so-called “conflict minerals”, unless they have the corresponding independent certificate accrediting that their extraction has not encouraged armed conflicts and/or human rights abuses in those areas.
- Promote compliance with these principles among its own suppliers in order to extend its commitment to compliance throughout the supply chain.

As part of the integral management of its supply chain and following a risk-based focus, Gonvarri Material Handling may evaluate compliance to these requirements. The supervision may be done through auto evaluation and/or by conducting an audit and by monitoring the plans for improvement, always in coordination and collaboration with the supplier.

In every case, Gonvarri Material Handling holds the right to break off the business relationship with suppliers that do not meet the requirements set out in this code, that do not allow for the indicated supervision or that cannot provide or commit to a plan for improvement.

Cases of non-compliance can be reported through the GI Ethical Channel, which is available and fully accessible.

The methods by which it can be accessed are:

<https://gonvarri.i2-ethics.com> and <http://www.gonvarri.com>

Email: [ethicschannel@gonvarri.com](mailto:ethicschannel@gonvarri.com)

Ordinary mail to the address: Auditoría Interna y Cumplimiento C/Embajadores s/n. 28053 Madrid.

By phone through the Call Back function: <https://gonvarri.i2-ethics.com>

Pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council, the supplier's representative (hereinafter the data subject) is informed that all personal data requested by means of this communication will be processed by Gonvarri Industries with postal address C/ Prolongación de Embajadores, s/n, 28053, Madrid, telephone number 913 79 19 00 and email [Privacy.Enquiries@gonvarri.com](mailto:Privacy.Enquiries@gonvarri.com), as the data controller. The data will be treated with the purpose of identifying the interested party in the acceptance of the Supplier Code of Conduct. The lawfulness of this processing is based on the legitimate interest of the data controller, as well as the execution of the commercial contract between the data controller and the company represented by the data subject. The personal data provided will be kept as long as the data subject does not exercise any of the rights granted by law. The data subject is informed that his/her data will not be transferred to a third party, unless legally obliged to do so. When there is any alteration or modification in the personal data of the interested party, the latter must inform Gonvarri Industries as soon as possible. The interested party may exercise the rights granted by the Law by following the procedure on the Gonvarri Industries website ( <https://www.gonvarri.com/en/privacy-management/> ).