

ASTARA SUPPLIERS

Code of Conduct



astara

CHANGE CONTROL

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Changing sections	Procedure
Change description	Astara's employees carry out their activities in fair working conditions, in compliance with the principles of the ILO
Clasification	

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1. PURPOSE

Suppliers Code of Conduct includes the ethical, social and environmental requirements that all Astara's supplier must accept and comply with to collaborate with Astara Group, assuming the commitment to extend it to its own supply chain.

The Astara's Suppliers Code of Conduct is aligned with Astara Group's Values and Code of Conduct, and together guide how our supply chain partners play an active role in achieving our objectives.

2. DEFINITIONS

- I. **Affiliate:** means any entity that directly or indirectly through one or more intermediaries, controls or is controlled by the entity specified. For purposes of this definition, control of an entity means the power, direct or indirect, to direct or cause the direction of the management and policies of such entity whether by contract or otherwise, and ownership of the majority of the voting rights of another entity shall create a rebuttable presumption that such entity controls such other entity.
- II. **astara, Group, or astara Group:** includes Astara Mobility, S.A., and all its Affiliates, and branches.
- III. **Astara's Personnel:** meaning all directors and officers, employees, consultants working within Astara and workers working at any Astara business anywhere in the world.

3. SCOPE

Astara requires that all its directors, officers and employees, together with all those who work with Astara Group, comply with the laws and regulations in force and act with integrity and ethics on all occasions.

Our intention, as part of the supply chain, is to work with companies that understand and share our commitment to the principles outlined in this Code.

Working together we will build a sustainable business relationship that will allow us to move satisfactorily towards achieving our goals.

We ask our supply chain partners to adhere to these principles, as well as to pass them on to their supply chain.

Supplier Business Principles In relation to the Reputation

Our suppliers **must**:

Comply and to make comply with the applicable legislation on the prevention of corruption and bribery, and implement policies and procedures to prevent corruption, bribery and facilitation payments.

Promote anti-corruption surveillance to prevent and detect activities such as bribery, fraud or money laundering.

Our suppliers **must NOT**:

Offer any incentive, gift or hospitality to employees, officers or directors of Astara Group, including their family or friends, in order to obtain or influence to Astara Group business.

All suppliers will carry out their activity in compliance with applicable legislation, as well as with the commitments derived from the commercial relations, they maintain with Astara Group.

The supplier will carry out its business with integrity, expressly complying with the following principles:

- Respect at all times the regulations that apply to it, developing its activity in accordance with the values and principles of astara Group in its relationship with its competitors and other stakeholders involved in the market.
- Know its own suppliers to guarantee the integrity of the supply chain.
- Maintain a behavior in accordance with the principles of action contained in this Code in all its commercial operations with astara Group.
- Not to engage in irregular commercial practices, including those involving price manipulation or others that go against free competition.
- Not to unduly influence in their commercial relations with both astara Group and with other entities, whether public or private.
- Encourage commitment to responsible procurement in its procurement processes.
- Take the utmost care to preserve the image and reputation of astara Group, avoiding any inappropriate and incorrect use of it, both by its employees and its subcontracted companies.
- Establish mechanisms that ensure objectivity and transparency in the development of its activities and comply with all applicable competition, antitrust and transparency regulations.

4. PROCEDURE

4.1. In relation to the People

Every supplier of Astara Group must respect the principles of the Universal Declaration of Human Rights and the conventions that develop it, as well as the recommendations of the International Labour Organization ("ILO") regarding the rights of workers in the performance of their activities.

In particular, the supplier shall promote and respect, inter alia, the following principles:

- Inform, as soon as they become aware, of the existence of any relationship with employees, directors or officers of Astara Group that may be a conflict of interest.
- Do not subject its employees to any kind of physical or verbal abuse or any other form of intimidation.
- Ensure that its employees carry out their activities in fair working conditions, in compliance with the principles of the ILO, related conventions and applicable local law, on working time, daily and weekly rest periods, and annual holidays.
- To comply with the principles of the ILO related to force labor and child labor and establish internal policies and controls to ensure such commitment through its procurement chain.
- Integrate criteria of diversity, equal opportunities, professional merit, objective assessments and non-discrimination in the recruitment, promotion, and training procedures.
- Do not allow any type of discrimination associated with ethnic or cultural origin, sex, gender identity, sexual choice, disability, nationality, religion, age, social origin or ideology, among others.
- Ensure that its employees carry out their activity in a safe and healthy workplace and in accordance with applicable legislation and international conventions on occupational safety and health.
- Guarantee to its employees the right of association and collective bargaining, without any type of sanction.

- Protect the confidential information of astara Group and the personal data, preventing them from being distributed without express authorization, stolen or damaged.
- Implement the necessary information security measures to ensure that both digital and document-type information have adequate protection depending on their level of security risk.
- Guarantee at all times the right to the protection of personal data of Astara's employees, protecting and making appropriate use of them and respecting in any case the applicable legislation on data protection.
- Inform Astara Group immediately of the existence of any security breach in the protection of personal data, in accordance with the provisions of the data protection regulation that is locally applicable.
- Establish dissemination, and awareness measures so that its employees know, assume and comply with the Code of Conduct for Suppliers of Astara.

4.2. In its relationship with the Commitment to the Planet

The supplier will promote the criteria of respect and environmental responsibility of Astara Group and in particular will expressly respect the following principles in relation to the environment:

- Comply with applicable regulations on safety, health, prevention of occupational risks and the environment, in order to guarantee responsible behavior with the environment.
- Prevent or minimize, where unavoidable, any negative impact on the environment or in the community in its operations.
- Have preventive measures to avoid or minimize pollution, with special consideration to the emission of greenhouse gases and the degradation of the environment.
- Apply environmental criteria in the contracting and monitoring of suppliers, extending these good practices to their own supply chain.

4.3. Compliance

Astara Group reserves the right to monitor compliance by its suppliers with this Suppliers Code of Conduct.

Our suppliers must:

- Comply with the more restrictive, whether those provided for in the applicable law or regulation or those established herein, in the provision of goods or provision of services to Astara Group.
- Implement systems and controls that ensure compliance with applicable laws and regulations and the principles established in this Code, including internal policies, and audit mechanisms.
- Apply these or similar principles to their own supply chain.
- Immediately notify Astara Group of any legal breach or the principles established in this Code.

5. BREACH OF THE POLICY

In the event of identifying a breach of this Supplier's Code of Conduct, depending on its severity, Astara shall be entitled to terminate the contract or purchase order and to revise its classification as a supplier of Astara Group.

6. ACCEPTANCE AND COMPLIANCE

This Astara's Suppliers Code of Conduct contains general requirements applicable to suppliers of goods and services of Astara Group. Contracts or particular purchase orders for goods or services may contain more specific provisions relating to these matters. In any case, if there is a contradiction or inconsistency between the provisions of this Code and any other provision contained in a particular contract or purchase order, suppliers must comply with the most restrictive provision.

7. REFERENCES

- Ethics Code
- Corporate Policy Anti-Corruption and Anti-Bribery

