



BLACK BULL GROUP

SUPPLIER CODE OF CONDUCT

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It's commendable that **Black Bull Group**, BBG in advanced, is committed to ethical business practices and sustainability. The present Supplier Code of Conduct (SCC) plays a crucial role in ensuring responsible behaviour across the supply chain with all the suppliers in relation with BBG. Let's delve into some key points from your provided information:

1. **Scope and Applicability:**
 - o The SCC applies to all suppliers engaged in business relationships with BBG.
 - o Suppliers include legal entities or individuals providing any kind of products or services to BBG.
2. **Compliance and Responsibilities:**
 - o Suppliers must ensure all their employees, consultants, agents, subcontractors, and representatives adhere to the SCC.
 - o If there's doubts about the interpretation or applicability of this document, suppliers should request for advice to their respective contact in BBG.
3. **Reporting and Corrective Actions:**
 - o Suppliers must promptly report any observed or alleged SCC breaches related to BBG business activities.
 - o In case of breaches, suppliers should take corrective actions at no cost to BBG.
4. **Transparency and Documentation:**
 - o Suppliers must provide relevant information upon request, including but not limited to details about sub-suppliers, supply chain risks, records of supply chain audits, and employment conditions, or any other requested by BBG to verify the compliance with it.
5. **Inspections and Consequences:**
 - o BBG has the right to inspect supplier and sub-supplier premises to verify SCC compliance.
 - o Breaches by suppliers or their representatives may lead to termination of business activities or civil actions.

The key points to be compliant with in for all the agents mentioned in the Scope of Applicability related with BBG are:

Compliance with Laws:

- ❖ Suppliers must adhere to all relevant local and international laws and regulations.
- ❖ If any provision in the SCC conflicts with national laws or regulations, suppliers should follow the stricter requirement.

This emphasizes for BBG the importance of legal compliance while maintaining ethical standards.

Business Ethics:

- ❖ *Zero-Tolerance Policy:* BBG maintains a strict zero-tolerance stance toward corruption and bribery and suppliers must align with this commitment.
- ❖ *Compliance with Laws and Regulations:* Suppliers are obligated to follow all relevant laws and regulations related to corruption, bribery, fraud, and other prohibited business practices.
- ❖ *Prohibited Activities:* Suppliers must refrain from accepting, requesting, receiving, or offering significant-value favours, gifts, or hospitality. The goal is to prevent any undue influence or advantage in business dealings.
- ❖ *Auditable Procedures and Standards:* Suppliers should establish auditable procedures and standards. These measures ensure that individuals acting on behalf of the supplier do not engage in corrupt practices.
- ❖ *Anti-Money Laundering (AML):* Suppliers must comply with all relevant laws and regulations related to anti-money laundering. AML measures aim to prevent financial transactions from being exploited for illicit purposes. As preventive measures for AML, suppliers should actively take steps to safeguard their financial transactions.
- ❖ *Antitrust Compliance:* Suppliers must adhere to antitrust laws and regulations. These laws promote fair competition and prevent anti-competitive practices.
- ❖ *Fair and Ethical Behavior:* Suppliers should conduct business in a manner that is both fair and ethical. This includes treating competitors, customers, and other stakeholders with respect and integrity.
- ❖ *Promoting Healthy Competition:* By following fair practices, suppliers contribute to a competitive marketplace. Healthy competition benefits all parties involved.
- ❖ *Avoidance of Conflict of Interest:* Suppliers must steer clear of any situation that could create a conflict of interest with BBG. This includes interactions with BBG representatives that might compromise their duty to act in the company's best interest. If an actual or potential conflict of interest arises, suppliers should promptly notify all affected parties. Transparency is crucial to maintaining trust and ethical business practices.
- ❖ *Data Privacy Laws and Regulations:* Suppliers must comply with all relevant data privacy laws and regulations. This includes handling personal and sensitive data appropriately.
- ❖ *Security Measures:* Suppliers should implement organizational and technical measures to safeguard data and BBG information. The level of security should align with the associated risks.
- ❖ *Contractual Compliance:* Suppliers are obligated to comply with contractual agreements related to privacy and confidentiality. Confidential or business-sensitive information should not be shared with third parties.
- ❖ *Sanctions and Export Control:* Suppliers must adhere to relevant sanctions and export control regulations. These regulations govern international trade and aim to prevent unauthorized transactions.
- ❖ *Screening Suppliers:* BBG will screen both potential and existing suppliers.

Human Rights:

- ❖ *Adherence to Applicable Laws and Standards:* Suppliers must comply with all relevant laws, international standards, and other legislation concerning human rights and labor rights. This includes safeguarding the well-being and dignity of workers.
- ❖ *Policies and Practices:* Suppliers should establish policies and practices to minimize infringements on human and labor rights. These measures contribute to a fair and respectful work environment.
- ❖ *Inclusive and Diverse Environment:* Suppliers should create an environment free from harassment, bullying, and discrimination (whether indirect, direct, or verbal).
- ❖ *Equal Opportunities:* Suppliers must ensure equal opportunities for every employee. Fair treatment promotes a positive workplace culture.
- ❖ *Compliance with Laws:* Suppliers should adhere to applicable laws concerning working conditions and compensation. Employees must have clear and understandable employment contracts.

- ❖ *Worker and Visitor Welfare:* Suppliers are responsible for ensuring the health, safety, and welfare of both workers and visitors. This includes measures to prevent accidents, injuries, and health risks.
- ❖ *Public Safety:* Suppliers must also protect the public from health and safety risks associated with their operations. Compliance with all applicable laws and regulations is essential.
- ❖ *Worker Training:* Suppliers should ensure that workers understand safe practices and potential hazards related to their work. Regular and adequate training helps maintain a safe workplace.
- ❖ *Zero Tolerance:* Suppliers must not participate in, use, or tolerate child labor, forced labor, or human trafficking. Compliance with these standards ensures ethical and responsible business practices.
- ❖ *Employee Rights:* Suppliers must respect employees' rights to join unions and organize collectively.

Environment:

- ❖ *Precautionary Approach:* Suppliers should adopt a precautionary approach to environmental challenges. This means taking preventive measures to minimize negative impacts.
- ❖ *Compliance with Laws and Regulations:* Suppliers must adhere to applicable environmental laws and regulations. Obtaining necessary approvals, permits, and registrations is essential.
- ❖ *Supporting Environmental Commitments:* Suppliers are expected to align with BBG's environmental commitments. Implementing activities to reduce environmental impact is crucial.

As a result of the foregoing, any supplier working in any way with BBG shall comply with the SCC and promptly inform BBG of any deviations therefrom.

José Manuel Palma Escudero

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