

Code of ethics

Nervion Group

for suppliers and

business partners

NERVION

Index

- 1. Introduction**
- 2. General principles**
- 3. Environmental Sustainability**
- 4. Social Responsibility and Human Rights**
- 5. Governance and Compliance**
- 6. Supply Chain Ethics**
- 7. Supplier Relationship Management**
- 8. Auditing, Monitoring and Corrective Action**
- 9. Communication and Ethical Channel**
- 10. Acceptance of the Code**

1. Introduction

The Nervion Group - comprising *Nervion Industries Engineering and Services, S.L.*, *Fivemasa, S.A.* and its investee companies - promotes a corporate culture based on ethics, sustainability and strict compliance with applicable regulations. Our suppliers and business partners are key players in this commitment.

This "Nervion Group Code of Ethics for suppliers and business partners" establishes the principles that should guide their conduct and forms an essential part of our business relations. Compliance with, and ongoing application of the code is expected in all transactions with the Nervion Group; the benchmark being the Nervion Code of Ethics, its Purchasing Policy and the ten principles of the United Nations Global Compact.

2.. General principles

Suppliers and business partners should:

- Act ethically, professionally, transparently and with integrity.
- Comply with all local and international laws and regulations applicable to their business.
- Promote these principles throughout their own supply chain.

3. Environmental Sustainability

Suppliers shall:

- Comply with environmental regulations and minimise the negative impact of their activities.
- Promote energy efficiency, emissions reduction and responsible use of resources.
- Apply clean and sustainable technologies and protect the health of workers and communities.

4. Social Responsibility and Human Rights

Required:

- Respect for internationally recognised human and labour rights.
- Reject all forms of child labour, forced labour, modern slavery and human trafficking.
- Promote a safe, inclusive, respectful and non-discriminatory working environment.
- Comply with labour legislation, working hours and working conditions.
- Ensure secure, confidential whistleblowing mechanisms.

5. Governance and Compliance

Suppliers must comply with:

- All commercial legislation and regulations, including:
 - Competition and antitrust rules.
 - Legislation on export controls, sanctions and embargoes.
 - Protection of personal data, trade secrets and intellectual property.
- Their company's commercial and registration disclosure obligations.
- Strict prohibition of all forms of corruption, bribery and money laundering.
- No criminal record, serious administrative sanctions or public complaints related to economic crime in the last five years.
- Prohibition on offering gifts, incentives or favours to Group employees that may influence business decisions.
- Respect the privacy and confidentiality of employees and partners, and protect confidential data and information from misuse.

6. Supply Chain Ethics

The supplier shall:

- Apply the principles of this Code throughout its supply chain.
- Conduct due diligence on conflict minerals in accordance with OECD guidelines.
- Cooperate with the Nervion Group in audits, evaluations and other verification mechanisms.

7. Supplier Relationship Management

The Nervion Group selects and evaluates its suppliers on the basis of:

- Criteria of impartiality, objectivity, technical and regulatory suitability, sustainability, quality and price.
- Transparency and respect for free competition.
- Staff professionalism and loyalty to Group companies.

8. Auditing, Monitoring and Corrective Action

- The Nervion Group reserves the right to audit or assess compliance with this Code at any time.
- It also reserves the right to take corrective measures, suspend or terminate the business relationship in the event of:
 - Proven non-compliance.
 - Lack of collaboration in audits.
 - Systematic breaches or violations of international principles.

9. Communication and Ethical Channel

If suppliers detect or suspect violations of this Code, they may:

- Notify the relevant contact person within the Group.
- Use the whistleblowing channel at:
<https://www.nervionindustries.com/codigo-etico-y-canal-de-denuncias/>



10. Acceptance of the Code

This Code of Ethics is automatically accepted upon becoming a business partner or supplier to the Nervion Group.



Signed: Antonio Alfonso Sánchez
Chief Executive Officer