



RESPONSIBLE PURCHASING POLICY

FOR APPROVED SUPPLIERS

At Oroel there is a commitment to a sustainable business model, based on the circular economy. The purchases process comprises one of the key functions of the company due to its high impact on economic, environmental and social sustainability. This is the reason why, with this policy, we want to reflect the basis for our commitment in the area of purchasing and throughout our supply chain, bearing in mind the needs and expectations of our interest groups.

The purpose is to establish a framework of mutual understanding, which makes it possible to maintain stable and lasting business relations with the suppliers with the aim of creating value sustainably.

This policy is applied with regard to the acquisition of products and services of any type.

COMMITMENT OF OROEL TO ITS SUPPLIERS AND CONTRACTORS

Oroel is committed to always acting ethically and responsibly in accordance with the principles of transparency, veracity, trust and good faith with the highest possible level of rigor, objectivity and professionalism in relations with its suppliers.

All collaborators with Oroel must know and observe the following principles and guidelines for behaviour in the performance of their professional activity, with regard to the purchasing processes and supplier relations.

1. **Legal compliance.** Compliance with legal regulations will be ensured in all purchasing and service contracting processes.
2. **Confidentiality and protection of personal data.** The confidential information that may be accessed as a result of commercial relations will be protected and will not be disclosed, particularly personal data.
3. **Honest behaviour.** Those in charge of relations with suppliers and contractors will bring to this task the professional integrity and ethics that characterize the professional behaviour of the employees of the Group, avoiding illegal payments, extortion, bribery or any other form of corruption.
4. **Conflict of interest and independence.** Purchases must not be influenced by personal relations, family ties or any other particular interests of the personnel. These must be done with total impartiality of decision.



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5. **Promotion of sustainable business practices.** Oroel will promote stable business relations that enable its suppliers and contractors to comply with their needs and commitments of economic, social and environmental sustainability.

Thus, it will be ensured that the defined delivery periods and payment conditions do not prevent them from complying with basic labour standards, environmental legality or compromise their economic sustainability. For the same reason, drastic changes will be avoided with regard to the conditions agreed on in the course of the business relationship.

WHAT OROEL EXPECTS FROM ITS SUPPLIERS AND CONTRACTORS: BASIC GUIDELINES

Oroel recognizes and values those business organizations that, like the company itself, are committed to the creation of value based on circularity and on economic, environmental and social sustainability.

Suppliers and contractors are expected to comply with the following basic standards linked to ethical behaviour, human and labour rights, occupational safety and health, and respect for the environment. The standards included below constitute minimum, not maximum standards. In other words, suppliers and contractors must not use this policy to avoid surpassing these standards.

In addition to the application of these basic standards, companies are expected to comply with applicable legislation in each case (local, regional, national, international, etc.). In the event that the provisions of the law and these basic standards cover the same subject, that of widest range will be applied. **Respect for basic human and labour rights:**

Suppliers of Oroel will carry out their business and professional activities, always respecting:

- **The fight against forced labour.** Employment will be chosen freely. Forced labour will not be allowed, this being understood as any work carried out under the threat of any punishment or retaliation for which the individual does not freely volunteer.
- **Prohibition of harsh or inhumane treatment:** Intimidation of the workers through verbal abuse, physical abuse or discipline, threats or sexual or other types of harassment will not be allowed.
- **Elimination of child labour:** Illegal child labour or any form of child exploitation will not be allowed.
- **Regularized employment:** The work performed must be based on a recognized employment relationship, established by national legislation and practice, or international work standards.
- **Respect for freedom of association and the right to collective bargaining.** The rights of association, affiliation and collective bargaining of their workers will be guaranteed, always following the standards applicable in each case.



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- **Non-discriminatory practices.** Non-discrimination will be promoted with regard to employment and occupation for reasons of race, age, gender, civil status, sexual orientation, nationality, social or ethnic origin, ideology or public opinion, religion, physical capacity, state of health, pregnancy or any other personal, physical or social condition of their employees, promoting equal opportunity among them.
- **Payment of decent living wages.** The wages and benefits paid will comply at least with the legal national regulations, the local regulations or the regulations of the industry of reference, or whichever is higher. All workers must receive written and comprehensible information regarding their work conditions in relation to the wages before starting the employment relationship, and regarding the details of their wages during the payment period in question each time they receive wages. Reductions of wages as a disciplinary measure will not be allowed.
- **Reasonable limitation of working hours.** The standard working hours will respect national legislation and the standards of reference of the industry, those which offer better protection to the employee prevailing.

1. Basic occupational safety and health conditions

Oroel expects its suppliers and contractors to promote the application of work safety and health standards and policies that assure:

- A safe and healthy working environment that complies with the requirements on occupational risk prevention and/or or work safety.
- Facilities that guarantee industrial hygiene, sufficient lighting and ventilation, toilets and access to drinking water, with safety equipment in the event of fire and for adequate protection for each activity.
- Preventive measures for preventing work accidents and occupational diseases, with responses for emergency situations during the performance of work activity.
- Training and education in health and safety of employees in order to ensure their safety and that of other persons in their area who could be affected during the performance of the activity.
- The supply of material, parts and equipment in general, certified and/or approved in the area of occupational safety and health with regard to current regulations.

2. Respect for the environment

Oroel is committed to the preservation of the environment and has a consolidated and efficient standard of environmental management and always acts in accordance with that established in the environmental legislation applicable to its activities.



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Its suppliers are expected to carry out their activities responsibly, in accordance with current legislation of each country where they have operations, minimizing their environmental impact, promoting measures that fight climate change and respect biodiversity.

3. Ethical behaviour

In addition to the aforementioned compliance with applicable legislation in each case, Oroel expects its suppliers and contractors who carry out their activities under the commitment to ethical behaviour based on professional integrity and ethics, avoiding conflicts of interest, extortion, bribery or any other form of corruption, as well as avoiding any practice of unfair competition.

VALIDITY PERIOD, REVISION AND APPROVAL OF THE POLICY

This policy has been approved by the management of Oroel and will remain in force as long as no modification or revision of the policy is approved.

The content of this document will be updated and revised periodically, following the same procedure as in its drafting, and adapting it to the changes of society in general and of Oroel in particular.

Any modification of this policy will be duly communicated to the suppliers of Oroel.

If you wish to begin the process of approval as a supplier of Oroel, you can contact us at info@oroel.com.