

QGMI group, comprising QGMI, its subsidiaries and divisions (Business Associates), is committed to generating value for all its stakeholders.

Our business strategy is based on our sustainable development principles, which include value creation, anti-corruption in business, promoting sustainable environmental performance and corporate social responsibility. Our approach to sustainable development encompasses how we work with our Third Parties. All our Business associates are required to identify, prevent and manage risks related to Anti-Corruption, Human Rights in the Workplace, good labour practices, including fair remuneration practices, Health and Safety (H&S), Social Responsibility and the Environment in their supply chain.

For the purpose of this Third Party Code of Ethics, 'Third Party' means any party acting as a bidder, supplier, contractor, consultant, agent or intermediary who provides or submits an offer to provide (in the form of a bid/bid/quote or proposal) goods and/or services and/or who has won a contract to provide goods and/or services to any company of the Group.

QGMI aims to establish long-lasting relationships with Third Parties who are committed to sustainable development and ethical behaviour. Our goal is to work with Third Parties which provide good quality and value for money purchases for QGMI and its customers in a way that results in good supply chain management.

Your company and employees, as QGMI Third Parties', are key to our success. For QGMI, delivering excellent services in a responsible manner is an unwavering principle. As such, QGMI requires its Third Parties to align themselves with the same ethical and responsible values that guide our behaviour and are embodied in this document. The provisions of this document are not intended to be an exhaustive list of all the requirements to be met by the Third Party, but rather a high-level summary of these requirements.

We are looking for Third Parties who share values of integrity, excellence, teamwork, commitment and sustainability. Our Third Parties must observe and adhere to this Code of Ethics, comply with laws, fight corruption, uphold human rights and care for the environment.

As our Third Party, we expect you to commit to the following conduct throughout your supply chain:

- **Legal compliance:** As duly registered companies we are subject not only to the laws of the country we are based in, but also to the laws of those we operate in. Just as QGMI observes and complies with the applicable laws, we expect the same from all of our Third Parties in all of the countries in which we operate.
- **Prohibited Practices:** QGMI prohibits all forms of bribery and corruption. As a Third Party, you shall not seek to influence others, or seek to be influenced by others, either directly or indirectly, by paying or receiving bribes or kickbacks, including, but not limited to, payments to government/public officials by QGMI employees, agents and/or Third Parties for the performance of routine governmental administrative actions (commonly known as facilitation payments), to gain and/or retain business and/or any business advantage, and/or to improperly benefit QGMI in an illegal manner. Nor shall they seek to engage in any other activity that is illegal, unethical or that tarnishes QGMI's reputation of honesty and integrity and/or that of any Group company. At QGMI we have zero tolerance for corruption, therefore, it is totally prohibited:
  - Bribe or pay any form of kickback (whether monetary or otherwise) to QGMI in order to obtain improper or illicit benefits of any kind, such as job offers or any undue advantage.
  - Bribe or pay any form of bribe (whether monetary or otherwise) to any third party in order to obtain benefits of any kind, such as gaining or retaining business, gaining business advantages or to improperly benefit QGMI or any Group company.

- Make any facilitation payments while acting for or on behalf of QGMI or Business Associates, unless, due to specific circumstances, such payments are permissible by law. For example, where the health or safety of a collaborator is in imminent danger, applicable laws may permit such payments. In such cases you must notify QGMI in writing immediately.
- Offer or provide any gift, hospitality, sponsorship, grant, donation, political donation, or other similar benefit on behalf of QGMI or any Group company or any QGMI collaborator.
- Engage in or be involved in any criminal activities, including but not limited to: money laundering, fraud, terrorist financing, arms, drugs, or substance trafficking, and/or trading in goods prohibited by law.
- Use third parties to circumvent the prohibitions detailed above. In other words, Third Parties may not do any of the above activities directly or indirectly through an external party.

Instead, Suppliers **shall**:

- Comply with all applicable laws (as set out above).
- Adopt adequate procedures to prevent bribery, corruption and subtypes (and notify QGMI if they require clarification as to what the adequate procedures entail).
- Notify the QGMI Group Ethics & Compliance Department of any suspected breach of this Code of Ethics (as set out above).
- Provide QGMI with reasonably necessary cooperation during investigations (as set out above).
- Take reasonable steps to ensure that the specific anti-bribery and corruption requirements of this Code of Ethics are communicated to subcontractors and other business partners involved in supplying products and services to the Group and to ensure their compliance with the requirements (as set out above).

- **Competition Laws:** QGMI believes that promoting fair competition is fundamental to free enterprise. We do not engage in anti-competitive practices and encourage fair competition among our Third Parties and potential Parties. These parties shall comply with all applicable antitrust and competition laws in the performance of their contractual obligations to QGMI and, to that end; We have a zero tolerance policy towards any form of anti-competitive conduct. Third Parties shall not be permitted to introduce terms and conditions that violate competition or antitrust laws into their contractual arrangements with QGMI and any Group company. Our Third Parties shall not enter into any arrangements, understandings or agreements with competitors that affect prices, the terms under which products are prepared or sold, or the quantity and type of products prepared or sold.
- **Conflicts of interest:** Conflicts of interest can arise in a wide variety of situations and can reduce the credibility of the company, potentially leading to instances of prohibited practices. Therefore, in case of awareness of a situation in which your business interest could affect QGMI's interests, it is your obligation to inform us in advance, providing a rationale. The most common cases are: companies belonging to QGMI family members, family members with decision-making positions in business with third parties, etc.
- **Human Rights:** At QGMI we are aware of the impact of our activities on society and the communities we operate in and believe that Human Rights and the Dignity of the Human Person are pillars of an ethical society, such that in all our operations we observe, apply and respect the standards set out in the United Nations (UN) Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. We expect our Third Parties and their subcontractors to also make and observe this commitment:
  - **Child labour:** employing or offering employment to children is an illegal and undignified practice. Child labour in any form shall not be tolerated and our suppliers must ensure that their direct or indirect labour does not employ workers who are considered 'minors' under local law. Third Parties must be committed to fighting against child exploitation and therefore prohibit any use of child labour with any vendor, supplier or other third party throughout your supply chain.

- **Human trafficking, slavery and the right to voluntary labour:** Modern slave labour is one of the most undignified and unjust crimes that humankind can commit, as it subjects another human being to undignified and degrading conditions. Our Third Parties must proactively act and ensure that all work performed by their employees is carried out within applicable labour standards; without the use of forced or compulsory labour; must not restrict the free movement of employees; such as requiring employees to surrender identification documents, passports or work permits as a condition of employment; must not do business, tolerate or associate with organisations or entities that tolerate or engage in coercing or imposing labour with little or no freedom of choice, or charging fees in the selection process, among others.
- **No discrimination and racism:** QGMI ensures that the work environment is diverse, inclusive and heterogeneous, free from harassment and discrimination of any kind, such as ethnicity, religion, nationality, gender, sexual orientation, age, disability, veteran or military status, or other characteristics protected by law. Suppliers must ensure that they have policies and practices in place to promote an environment free of harassment, discrimination and racism and that they protect their employees from retaliation by ensuring a safe and diverse environment.
- **Privacy:** Suppliers must respect the privacy of employees and comply with all laws when collecting, using and protecting personal information (personal data protection). Only data necessary to fulfil the purpose of the relationship should be collected, and a mechanism for exercising personal data protection, such as email or a communication channel, should be provided.
- › **Commitment to occupational health and safety:** At QGMI we embrace sustainability as a fundamental principle, which is applied in all our operations and supplier relationships. We are firmly committed to occupational health and safety, imposing strict standards to protect our direct and indirect workforce. Our Third Parties must ensure that they: **(1)** Comply with all health and safety laws where they operate; **(2)** Provide appropriate PPE (personal protective

equipment) whenever necessary and at no cost to the worker; **(3)** Ensure that workers can express their views and concerns in the knowledge that they will not suffer retaliation or harassment.

➤ **Commitment to the environment:** Our standards related to environmental protection include implementing climate change mitigation strategies, optimising resource use, reducing noise pollution and managing waste effectively. We encourage practices that promote the circular economy and biodiversity conservation, including policies against deforestation and to preserve ecosystems. We expect our Third Parties to implement sustainable practices that minimise the environmental impact of their activities. Third Parties must guarantee and respect the rights of the local communities where they operate, valuing their cultural diversity, promoting peaceful coexistence and disseminating sustainable practices.

At QGMI, we believe that an integrated and holistic approach to sustainability is crucial to our continued success, benefiting our stakeholders, customers and the environment on a broad and long-lasting basis.

➤ **Disclosure and Training:** In order to ensure that the aforementioned practices and commitments are respected and adhered to throughout the supply chain, this Code of Ethics must be disclosed to your collaborators, subcontractors and those responsible for providing services/supplies to QGMI, ensuring that they commit to comply with it. Third Parties shall periodically train their employees to ensure that the standards set forth herein have been properly understood and are being properly observed in their day-to-day provision of services/supplies to QGMI.

➤ **Privacy and Information Confidentiality:** QGMI expects that all information shared with third parties, or that may be accessed as a result of developing contractual activity with QGMI, especially that which contains personal data, shall be treated with the highest standards of security and confidentiality, not making use of this information for purposes other than the ones they were provided for and always complying with applicable local laws and with our policy of protection of personal data.

> **Ethical Channel:** QGMI has a channel for reporting potential breaches of its Code of Ethics and the law, this channel is open and available to everyone. Therefore, it is the obligation of our Third Parties – including their employees and supply chain – to report through this channel any suspicion or knowledge of misconduct in relation to goods, services, persons and/or activities provided for and/or on behalf of QGMI. You can report it through our website <https://qgmi.integrityline.app/>.

Third Parties subject to this Code must cooperate with QGMI and provide, in due time and form, the documentation supporting the fulfilment of the commitments assumed in this Code, as requested by QGMI.

QGMI reserves the right to modify the requirements of this Code of Ethics as a result of changes in legislation or in its Ethics & Compliance Programme, in which case QGMI shall communicate such changes or expectations to Third Parties.

The Supplier hereby acknowledges its agreement and acceptance of this Supplier Code of Conduct. (and all requirements imposed on the Supplier) by attaching its authorised signature below:

Signed at:

\_\_\_\_\_ on \_\_\_\_\_ of \_\_\_\_\_ of 20 \_\_\_\_\_

Name of company/third party: \_\_\_\_\_

Name of signatory: \_\_\_\_\_

Position: \_\_\_\_\_

\_\_\_\_\_  
Signature