



Suppliers Code of Conduct

Fundación MOP – The MOP
Foundation

Control de versiones

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I. PURPOSE

The purpose of this Code of Conduct is to define the minimum standards of ethical and responsible behaviour by suppliers in the performance of their activities for Fundación MOP – The MOP Foundation (hereinafter, the “Foundation” or the “FMOP”), in line with the corporate culture of compliance of the FMOP firmly based on the values, principles and guidelines of behaviour set forth in its Code of Conduct and mandatory for all the directors, managers and employees of the Foundation.

The Foundation agrees to provide the necessary means to ensure that its suppliers know and understand this Code and can, therefore, comply with it.

2. SCOPE

All suppliers of the FMOP must comply with this Code, which must govern their behaviour in the development of their activity for the Foundation and reflects their commitment to the principles, values and guidelines of conduct of the FMOP.

This Code takes into account that companies are capable of being prosecuted for criminal offences and prevents and prohibits behaviours that could give rise to the liability of the Foundation.

3. GENERAL PRINCIPLES OF BEHAVIOUR

The following are the principles and values that apply to the Suppliers of the FMOP in the previously described terms:

3.1. Respect for the law and ethical values

The suppliers of the Foundation shall promote a behaviour based on the respect for the law and ethical values and principles.

All Suppliers must act in strict compliance with the law, respecting the internationally recognized ethical principles contained within the Universal Declaration of Human Rights, at all times being governed by the respect for human rights and the values of integrity and honesty, avoiding any action that may be contrary to the law in force.

3.2. Respect for individuals and non-discrimination

Suppliers will treat their employees with dignity and respect. Under no circumstances they will tolerate any type of harassment or discrimination based on race, ethnicity, colour, nationality, age, sex, marital status, sexual orientation, beliefs, trade union membership, religion, family situation, disability or any other type of condition, as well as any conduct that is intimidating or offensive to

the rights of individuals. Suppliers will respect and protect the sexual freedom, privacy and moral integrity of their employees and third parties in the scope of all work and/or professional activity.

3.3. Commitment to the environment

3.3.1. Work environment

Suppliers should make available to their employees enough means for the development of their activity. Likewise, they should adopt the preventive measures established in the legislation that aims to guarantee the health and safety for employees.

Suppliers shall respect the freedom of association and the right to collective bargaining of its employees, subject to the regulations applicable in each case.

Suppliers shall take effective steps to assess, prevent and mitigate the risk of modern slavery and child labour in its operations and supply chain in accordance with the applicable legislation, along with the internationally recognized ethical principles and the provisions of the International Labour Organization (ILO).

Likewise, Suppliers shall respect the applicable legislation and collective agreements regarding the minimum wages to be paid to the employees.

3.3.2. Respect for the environment

Suppliers shall adopt an ethical and responsible attitude that combines the creation of value with sustainable development in the performance of their business activity, taking into consideration the protection of the environment as part of their main objectives, complying with the applicable regulations, and minimizing the environmental impact of their business.

Suppliers shall respect the environment and carry out their activity minimizing the environmental impact derived from the exercise of the same, seeking the efficient use of all resources available.

3.4. Relationship with third parties

Suppliers, in their relationship with third parties, will not directly or indirectly accept gifts or compensation of any kind intended to improperly influence in the performance of their activity, avoiding any form of corruption (corruption among individuals, bribery, influence peddling, etc.).

3.4.1. Relationship with third parties (public administrations, companies and other market players)

In the relationship with Public Administrations (of any scope, local, regional, national and international, including public companies and other entities or organizations of a public nature), Suppliers shall act following principles of integrity and honesty, with absolute respect for the rules of behaviour that govern relations with public bodies and authorities and rejecting any action that may be linked to bribery, influence peddling or any form of corruption.

In the course of the relationship with the FMOP, no Supplier shall offer, grant, request or accept, directly or indirectly, gifts, favours or compensation, in cash or in kind, of any nature whatsoever, to or from any authority, regulatory body, public official or any person participating in the exercise of public functions.

Suppliers must also be committed to compliance with the law, providing maximum cooperation with the authorities in all matters in which they are required, including the fight against money laundering and the financing of terrorism.

In no case any action contrary to the principles described in this Code that may compromise the image of the FMOP will be accepted.

Suppliers must undertake to comply with antitrust regulations, avoiding any conduct that may constitute collusion, abuse or restriction of competition, acting in the markets in a fair manner, without carrying out misleading advertising or practices denigrating third parties.

3.4.2. Relationship with society

Suppliers shall maintain independence in their actions. Any contribution that they may make to political parties, authorities, Public Administrations and institutions in general will always be made in accordance with current legislation, on a personal basis and guaranteeing their independence. If a conflict of interest may arise regarding the acceptance of a public position, the Supplier concerned must inform about the situation to the Compliance Supervisory Body of the FMOP.

3.5. Information policies

The FMOP considers information to be one of the most valuable assets of the Foundation, therefore this Code of Conduct promotes its protected use.

3.5.1. Confidentiality

Internally, Suppliers shall treat the information to which they have access by reason of their professional activity in a confidential and reserved manner, refraining from using for their own benefit and communicating in any way any data, information or document obtained during the exercise of their activity.

The obligation of confidentiality shall remain after the termination of the relationship with the FMOP and shall include the obligation to return any material related to it that the Supplier may possess.

3.5.2. Privileged information

Access to insider information that Suppliers may have shall be governed by the obligations, limitations and prohibitions set forth in the applicable regulations.

3.6. Use and protection of assets

Suppliers undertake to make a responsible use of the assets, resources and any other means made available to them for the development of their professional activity.

In this respect, Suppliers shall respect the intellectual property and the right of use that corresponds to the FMOP, either as a result of their professional activity or that of third parties.

Suppliers must also respect the intellectual and industrial property rights held by third parties outside of the FMOP.

3.7. Transparency and integrity of financial tax information

Suppliers are obliged to comply with the applicable tax regulations. Based on the above, the Suppliers' actions in tax matters must be governed by the principles of integrity, transparency, prudence and efficiency.

4. CONTROL Y SUPERVISIÓN DEL CUMPLIMIENTO.

Suppliers are obliged to comply with this Code of Conduct, and their acceptance of and commitment in their professional performance to the values, principles and standards of conduct contained in it must be recorded in writing.

In this sense, and to ensure compliance with this Code, all Suppliers with a legitimate interest may bring to the attention of the FMOP's Compliance Supervisory Body, in good faith, complaints of non-compliance or consultations regarding the interpretation or application of this Code, using any of the following means:

- a) By email: buzonetico@themopfoundation.org.
- b) By ordinary mail to the following postal address with certificate of receipt: Ethics Channel Fundación MOP – The MOP Foundation, Cantón Grande nº 4, I5003 – La Coruña, Spain.

This Code of Conduct has been approved by the Board of Trustees of the FMOP and has been incorporated into the Foundation's internal regulations and will remain in force until its cancellation or amendment is approved.

Any amendment of this Code of Conduct must be approved by the Managing Body of the FMOP.