

**DANOBATGROUP SUPPLIER CODE OF  
CONDUCT**

Elgoibar, January 2026

## 1 INTRODUCTION

DanobatGroup S. Coop and the companies that make up DanobatGroup (hereinafter, Danobatgroup) aim to ensure that their conduct and that of their members comply with current legislation and the ethical principles set out in its own Code of Conduct. We seek to build a responsible business model that ensures the creation of long-term sustainable economic value, taking into account the various stakeholders of our organisation.

We recognise that our suppliers, both direct and indirect, are key actors in our value chain and play a fundamental role in achieving our objectives and shaping our policies and strategies. We therefore encourage and expect our suppliers to adopt responsible practices in terms of ethics and integrity, transparency, health and safety, environmental responsibility and respect for human rights. This entails compliance with all applicable national and international laws at all times.

## 2 OBJECTIVE

This Supplier Code of Conduct establishes ethical principles and minimum expectations of conduct that are mandatory for all direct and indirect suppliers that make up the different supply chains of Danobatgroup. Our suppliers are responsible for familiarising themselves with and complying with the Supplier Code of Conduct and its ethical principles.

## 3 SCOPE OF APPLICATION AND DUTY OF COMPLIANCE

The Supplier Code of Conduct applies to both direct and indirect suppliers of Danobatgroup, regardless of the supplier's business sector, geographical location or activity. Danobatgroup's direct suppliers shall endeavour to cascade the requirements and guidelines set out in this Supplier Code of Conduct throughout their supply chains.

Our suppliers are required to be familiar with and comply with all applicable laws and regulations and the contractual terms agreed with Danobatgroup. It is also essential that they obtain all permits, licences and registrations required by law and keep them up to date.

## 4 WORKING CONDITIONS AND HUMAN RIGHTS

### 4.1 HEALTH AND SAFETY AT WORK

The health and safety of workers are essential priorities for [Danobatgroup](#). Therefore, all suppliers must comply with all applicable laws, regulations and standards in this area at all locations where they conduct their business activities, ensuring a safe and healthy working environment for workers.

This involves the use of appropriate designs, work safety procedures and preventive maintenance, as well as the provision of personal protective equipment where necessary. In addition, they must provide safety information to train and protect employees against occupational hazards, both on their own premises and by ensuring that those working in [Danobatgroup](#) premises comply with applicable health and safety procedures and applicable regulations on the coordination of business activities.

Similarly, suppliers must also provide the necessary information to enable [Danobatgroup](#) to protect its workers and the environment (e.g. by providing safety data sheets and information on the use of hazardous substances).

[Danobatgroup](#) recommends its suppliers to establish an appropriate health and safety management system (e.g. ISO 45001 or equivalent), including policies aimed at protecting the health, safety and welfare of employees.

### 4.2 WORKING CONDITIONS

All suppliers must comply with applicable labour laws and regulations in the following areas:

- **Recruitment in accordance with current legislation:** All employees must be employed in accordance with the labour laws in force in the relevant country. A written contract is required to formalise the employment relationship and must clearly set out the terms and conditions of employment.
- **Working hours and overtime:** Working hours and work schedules must not exceed the limits established by applicable legislation under any circumstances.
- **Permits:** Suppliers must ensure that their employees hold the permits and authorisations in accordance with the applicable legislation in the relevant country.
- **Wages and benefits:** Minimum wages and benefits established by law and collective agreements must be complied with. Clear and comprehensible information on terms and conditions of employment, including benefits, must be provided in a format and language accessible to employees.

- **Freedom of association:** Suppliers must comply with the provisions of the core conventions of the International Labour Organization (ILO) concerning freedom of association and the effective recognition of the right to collective bargaining.

### 4.3 SLAVERY AND CHILD LABOUR

Suppliers undertake not to use forced labour, servitude or slavery in any form, including human trafficking. This means that the organisation must not employ individuals through threats, coercion or fraud.

Suppliers must also ensure that no child labour is used in the performance of their work and that no products or services from child labour are used. Suppliers shall ensure compliance with the provisions of the core conventions of the International Labour Organisation (ILO) relating to forced labour and child labour.

### 4.4 EQUAL OPPORTUNITIES AND NON-DISCRIMINATION

Suppliers are required to treat all individuals with dignity and respect, providing equal opportunities and fair working conditions, regardless of the personal characteristics of employees or job applicants. This includes gender, gender identity or expression, age, nationality, race, ethnicity, skin colour, cultural background, religion or belief, disability, or any other characteristic that could give rise to discrimination. Suppliers must ensure a workplace free from harassment and promote equal opportunities for all.

In addition, suppliers shall protect workers against acts of humiliation, and against verbal, psychological, physical or sexual violence, as well as any discriminatory or otherwise harmful conduct.

## 5 ENVIRONMENT

**Danobatgroup** requires its suppliers to comply with all applicable environmental laws and regulations and to conduct their activities in a manner that minimises adverse environmental impacts. Any demonstrated continuous improvement in environmental performance will be positively considered.

**Danobatgroup** recommends its suppliers to establish an appropriate environmental management system focused on continual improvement (e.g. ISO 14001 or equivalent), including policies and procedures to effectively manage their environmental performance.

## 5.1 POLLUTION

In general, suppliers must prevent and minimise any type of pollution of the air, water, soil, as well as noise pollution or other types of pollution that may have adverse effects on the environment and/or people.

## 5.2 GREENHOUSE GAS (GHG) EMISSIONS AND ENERGY EFFICIENCY

To address the challenges of climate change and move towards a supply chain with zero net greenhouse gas (GHG) emissions, [Danobatgroup](#) recommends that all its suppliers progress in monitoring and reduction of their energy consumption and GHG emissions. Positive consideration shall be given to suppliers that make every effort to identify, measure and set company-wide reduction targets for energy consumption and greenhouse gas (GHG) emissions.

In addition, wherever possible, suppliers shall choose renewable and recycled and/or low greenhouse gas (GHG) emitting energy sources and materials.

## 5.3 WATER MANAGEMENT

Suppliers are encouraged to monitor and track their water consumption in order to identify opportunities for improvement and minimise consumption. In addition, suppliers shall take appropriate measures to minimise water consumption at their facilities and/or along their own supply chains.

Water shall be used and processed in a responsible manner, especially in the case of suppliers located in an area affected by water scarcity or suppliers with a high level of consumption. In addition, suppliers shall treat and clean all waste water from their operations appropriately and in accordance with applicable laws and regulations.

## 5.4 SUBSTANCES OF CONCERN AND CHEMICALS

Suppliers shall identify and declare hazardous substances, chemicals and materials, ensuring their safe transport, storage, processing, recycling, use and disposal. Suppliers undertake to ensure compliance with all legislation and regulations applicable to the control of materials and chemicals and the restriction of the use of materials and substances of concern, pollutants and/or prohibited substances (RoHS, REACH and CLP regulations, or TSCA in the United States, for example), providing the necessary information, documentation and certification that [Danobatgroup](#) may require.

Suppliers shall actively work to limit and restrict the number of chemicals with adverse impacts and select those with the lowest possible risk to health and the environment. Suppliers shall conduct risk assessments and take measures to minimise any negative impacts.

Suppliers shall also ensure that employees are aware of, and receive up-to-date instructions and training on, product safety practices and emergency preparedness.

## **5.5 CIRCULAR ECONOMY AND WASTE MANAGEMENT**

Suppliers shall demonstrate ongoing environmental responsibility and make continuous efforts to reduce, reuse and recycle waste, promoting continuous improvement and minimising waste throughout the product life cycle, thereby contributing to a sustainable circular economy.

## **5.6 BIODIVERSITY AND ECOSYSTEMS**

Danobatgroup requires its suppliers to protect the natural environment, in particular endangered habitats, and to ensure the sustainable use of natural resources. Suppliers shall strive to ensure that their supply chains do not contribute to deforestation or to the degradation of biodiversity and ecosystems, in compliance with applicable legislation.

DANOBATGROUP suppliers are required to respect and ensure compliance with all applicable legislation relating to the rights of minorities and indigenous peoples whose rights may be affected by their operations, as well as rights relating to land, forests and water, ensuring that rural, indigenous and local communities retain access to, use of, control over and ownership of land. Suppliers' operations must not adversely affect sources of cultural identity, autonomy or livelihood, nor result in any direct or indirect forced displacement of such groups.

In the same way, DANOBAT GROUP suppliers undertake to comply with all applicable legislation and to ensure that their activities are aligned with animal welfare and the ecosystem where they live so that their activities do not adversely affect animal welfare or the ecosystems concerned.

## **6 RESPONSIBLE PROCUREMENT OF MINERALS AND MATERIALS**

Danobatgroup aims to use raw materials whose extraction, production, transport, trade, processing and export do not contribute directly or indirectly to human rights abuses, the financing of armed conflict, health and safety problems, environmental pollution, deforestation or non-compliance with applicable regulations.

Danobatgroup will view positively the efforts made by suppliers of raw materials, or whose products contain conflict minerals (minerals sourced from conflict-affected and high-risk areas such as tantalum, tin, tungsten and gold) or other materials that may contribute to human rights violations, forced labour, the financing of armed conflict, climate change or deforestation, to establish due diligence processes and to implement policies and procedures ensuring supply chain traceability and risk management. Such efforts should extend to their own operations and upstream activities, including their suppliers, throughout the supply chain, and should promote audits at key control points within the supply chain (for example, smelters and refiners in the case of conflict minerals and other metals).

In this regard, suppliers shall comply with all applicable laws and regulations governing the raw materials and materials supplied to Danobatgroup, including, without limitation, legislation relating to conflict minerals, EUDR regulations, and laws prohibiting forced labour, etc.

In line with the above, suppliers undertake to support Danobatgroup in its efforts to identify, prevent and mitigate risks associated with conflict minerals, as well as other materials that may contribute to human rights violations, climate change or deforestation. To this end, suppliers shall work together with Danobatgroup:

- Providing requested information on the supply chain, operations, products and their characteristics (e.g. identification of supply chain actors, emissions data, etc.).
- Participating in and supporting the development of actions aimed at the prevention and mitigation of adverse impacts, complying at least with applicable legal requirements.

Suppliers shall strive to require a similar commitment throughout their respective supply chains, promoting the implementation of the measures adopted.

## 7 ANTI-CORRUPTION POLICY

Suppliers shall not engage in, endorse or tolerate any form of bribery or corruption, either directly or indirectly. Influence peddling is strictly prohibited. Suppliers shall not offer or accept any form of undue advantage to or from any third party, whether private or public, in order to obtain or retain business or secure any form of preferential treatment. Such advantages may include not only cash, but also employment opportunities, favours, travel, facilitation payments, promises to repay debts, gifts or unlawful hospitality or entertainment.

Suppliers shall strictly comply with all applicable national and international laws relating to money laundering and terrorist financing. In addition, they shall cooperate with the competent authorities in combating money laundering or the financing of illicit activities when required to do so.

Suppliers shall conduct business in an open and transparent manner and avoid conflicts of interest that may interfere with objective and professional decision-making.

In import and export activities, suppliers shall ensure compliance with all rules concerning import and export of goods, services and information imposed by applicable legislation, as well as by applicable external regulations imposed by other operators in the supply chain.

It is strictly prohibited to conduct business with persons or entities listed on official sanctions lists, regardless of the delivery process. Actions that could be related to smuggling are expressly prohibited.

Suppliers shall avoid any conduct that may constitute an abuse or unlawful restriction of competition.

## **8 INFORMATION MANAGEMENT AND CORPORATE SECURITY**

### **8.1 CONFIDENTIALITY, PROTECTION OF PERSONAL DATA AND PRIVACY**

Suppliers shall implement appropriate measures to ensure compliance with applicable data protection and privacy laws and regulations and shall maintain the integrity and confidentiality of the information they receive as a result of their relationship with [Danobatgroup](#). To this end, suppliers shall adopt adequate security measures to protect against misuse, improper handling, counterfeiting, theft or unauthorised disclosure.

### **8.2 CYBERSECURITY**

[Danobatgroup](#) also requires its suppliers to commit to information security and cybersecurity, ensuring data protection through appropriate physical and electronic security procedures. [Danobatgroup](#) recommends that its suppliers establish an information security management system and cybersecurity guidelines (for example, ISO/IEC 27000 or equivalent), including monitoring policies and processes, in order to protect information against breaches, cyberattacks or cyber incidents.

## 8.3 PROTECTION OF INTELLECTUAL AND INDUSTRIAL PROPERTY

Suppliers shall comply with all applicable legislation and regulations relating to intellectual and industrial property rights. The use of products, software, systems and technological know-how shall be carried out in compliance with the applicable legal framework.

Suppliers shall also implement effective measures to eliminate the risk of counterfeit parts and materials being introduced into the products they supply.

## 9 MANAGEMENT SYSTEM AND DUE DILIGENCE

Due diligence refers to the ongoing risk management process undertaken to identify, prevent, mitigate and account for potential impacts on the climate, natural resources and people arising from business activities.

Danobatgroup is committed to building ethical and responsible supply chains and will take into account the progress made by suppliers in establishing and maintaining appropriate management systems to ensure compliance with the principles and requirements set out in this Supplier Code of Conduct, in particular the implementation of due diligence processes aimed at preventing and mitigating risks and adverse impacts on people and the environment throughout the supply chain. Such processes shall be proportionate to the size and circumstances of the company and aligned with internationally recognised standards, including the OECD Due Diligence Guidance for Responsible Business Conduct and the United Nations Guiding Principles on Business and Human Rights.

## 10 INTERNAL REPORTING SYSTEM

Any person who becomes aware of any non-compliance shall report it directly through the Internal Reporting System of the respective companies that make up Danobatgroup.

All reports submitted through the Internal Information System shall be handled in compliance with the requirements of Law 2/2023 of 20 February on the Protection of Whistleblowers, as well as with personal data protection regulations.

Danobatgroup guarantees the confidentiality of the existence and content of reports submitted to the Internal Information System. Furthermore, the Internal Reporting System allows reports to be submitted anonymously.

No action constituting retaliation or any adverse consequence shall be taken as a result of submitting a report.

Suppliers shall have their own Information Systems that comply with the requirements of the applicable laws and shall, in all cases, guarantee confidentiality and the prohibition of retaliation.

## 11 SUPPLIER RESPONSIBILITY

Suppliers' commitment to the principles set out in the [Danobatgroup](#) Supplier Code of Conduct is essential to maintaining an ethical and sustainable business relationship. Suppliers, in applying this Code, ensure that their own practices and policies are aligned with established standards, and are committed to maintaining a high level of integrity in all their operations related to [Danobatgroup](#).

Adherence to the [Danobatgroup](#) Supplier Code of Conduct is an essential requirement during the supplier selection process by [Danobatgroup](#). By signing this Code, suppliers agree that these principles apply to all existing contracts and future business relationships with [Danobatgroup](#). It is a binding commitment that entails compliance with the minimum standards of good practice established by [Danobatgroup](#) and with all applicable laws and regulations.

[Danobatgroup](#) reserves the right to monitor the implementation of, and ongoing compliance with, this Supplier Code of Conduct by its suppliers. Such verification may be carried out through self-assessment questionnaires, audits of suppliers' facilities and activities, or other mechanisms, subject to prior notice to suppliers. In addition, suppliers shall maintain appropriate documents and records to ensure compliance with regulations.

Failure by suppliers to comply with the contents of this Supplier Code of Conduct may have consequences for their contractual relationship with [Danobatgroup](#), without prejudice to any other legal or administrative actions that may be applicable.

Open and honest communication between [Danobatgroup](#) and suppliers is encouraged to address any non-compliance in a transparent and effective manner, ensuring a sound and ethical business relationship.

Any queries regarding the interpretation or application of this Supplier Code of Conduct can be sent to [Danobatgroup](#) via email at [danobatgroup@danobatgroup.com](mailto:danobatgroup@danobatgroup.com).