



SUPPLIER CODE OF ETHICS

Code of Conduct, Human Rights and Working Conditions.

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1. Corporate Statement

TEF Montajes y Servicios S.L. conducts its business activities with a strong commitment to ethical, responsible, and transparent practices. This Supplier Code of Ethics establishes the principles and expectations that must be observed by all organizations collaborating with TEF, ensuring that the supply chain operates under standards of integrity, respect for human rights, fair working conditions, and environmental responsibility.

2. Purpose of the Code

The purpose of this Code is to ensure that all suppliers providing products or services to TEF:

- Operate in accordance with high ethical and professional standards.
- Respect human and labor rights.
- Comply with all applicable laws and regulations in the countries where they operate.
- Maintain responsible and transparent business practices.

- Support TEF’s environmental commitments, including principles aligned with ISO 14001.
- Promote a sustainable supply chain free from abusive or unethical practices.

3. Regulatory Framework and International Standards

Suppliers shall comply with all applicable legal requirements and internationally recognized standards related to business ethics, human rights, and sustainability, including but not limited to:

- International Bill of Human Rights.
- Fundamental Conventions of the International Labour Organization (ILO).
- United Nations Global Compact Principles.
- United Nations Sustainable Development Goals (SDGs).
- Applicable labor, tax, commercial, and environmental legislation.
- General Data Protection Regulation (GDPR), where applicable.
- Requirements derived from environmental management systems based on ISO 14001.

Where differences exist between local legislation and the principles established in this Code, the more stringent requirement shall prevail.

4. Scope of Application

This Code applies to suppliers, subcontractors, distributors, agents, representatives, and any third party acting on behalf of TEF or participating in its supply chain. Suppliers are responsible for ensuring that their own employees, contractors, and sub-suppliers comply with the principles established herein.

5. Business Conduct and Working Conditions

TEF suppliers shall conduct their operations with integrity, professionalism, and respect for individuals at all times. Suppliers are expected to comply strictly with applicable legislation, provide fair working conditions, and ensure that all employees work under legal and transparent employment agreements, receive fair compensation, and perform their duties within regulated working hours, including compliance with rest periods, vacation entitlements, and applicable social security obligations.

Suppliers shall also maintain safe and healthy working environments by rigorously applying occupational health and safety regulations, identifying and mitigating risks associated with their activities, and providing adequate training to their personnel. A proactive safety culture aimed at protecting the physical integrity and well-being of all employees is expected.

With regard to business ethics, suppliers must avoid any form of corruption, bribery, or improper advantage, and shall prevent and disclose any potential conflict of interest that could affect their relationship with TEF. All information provided to TEF must be accurate, complete, and properly documented.

6. Protection of Assets and Information

Suppliers shall protect TEF's confidential information, including technical, commercial, and personal data. Confidentiality obligations shall remain in force even after the contractual relationship has ended. Any unauthorized use, disclosure, or manipulation of information shall be considered a serious breach of this Code.

7. Human Rights

Suppliers shall guarantee full respect for human rights throughout their operations and supply chain activities. This includes ensuring dignified and respectful treatment of all individuals and prohibiting any form of discrimination, abuse, harassment, or degrading treatment.

Child labor, forced labor, and any practice that may constitute labor exploitation are strictly prohibited. Suppliers shall promote safe, inclusive, and coercion-free working environments, ensuring that employees benefit from appropriate working conditions and an environment that respects both their physical and moral integrity.

8. Personal Data Protection

Suppliers shall process personal data lawfully, securely, transparently, and exclusively for legitimate and necessary purposes. Any misuse of personal information is strictly prohibited.

9. Environmental Responsibility

In alignment with ISO 14001 principles and TEF's internal environmental policy, suppliers shall operate in an environmentally responsible manner and adopt practices consistent with sound environmental management principles. This includes:

- Compliance with all applicable environmental legislation and regulations.
- Minimization of the environmental impact associated with their operations.
- Proper management of waste, emissions, and discharges.
- Efficient use of natural resources.
- Avoidance of hazardous substances whenever safer alternatives are available.
- Cooperation with TEF in sustainability and environmental improvement initiatives.

10. Environmental Compliance Obligations

Suppliers shall systematically identify, understand, and comply with all legal, regulatory, and other environmental requirements applicable to their activities, products, and services. Suppliers are also expected to maintain appropriate mechanisms to periodically evaluate compliance and proactively address potential noncompliance situations or environmental risks.

In this regard, suppliers commit to:

- Maintaining procedures to identify and update applicable legal and environmental requirements.
- Ensuring compliance with all required environmental licenses, permits, and authorizations.
- Maintaining records and objective evidence demonstrating environmental compliance when requested by TEF or competent authorities.
- Promptly reporting any incident, sanction, significant noncompliance, or situation that could generate a substantial environmental impact.
- Cooperating with TEF in evaluation, monitoring, and continuous improvement activities related to environmental performance.
- Promoting a culture of environmental responsibility and compliance throughout their organization and supply chain.

Failure to comply with environmental compliance obligations may be considered a serious violation of this Code and may result in the measures established under Section 11, Monitoring and Compliance.


11. Monitoring and Compliance

TEF reserves the right to conduct assessments, audits, or inspections to verify compliance with this Code. Noncompliance may result in:

- Suspension of the business relationship.
- Termination of contracts.
- Exclusion from future procurement or sourcing processes.

12. Review and Update

This Code shall be periodically reviewed and updated to ensure alignment with applicable legislation, international standards, and TEF's ethical, social, and environmental commitments.



Ferran Forges Prados
Owner

Sant Boi de Llobregat, March 20th, 2026