



VERSION: 01

Responsible Sourcing Policy

Purpose

Incorporate economic, social and environmental aspects into the purchasing and contracting process, according to our sustainability policy.

Promote responsible sourcing practices throughout the value chain to ensure the supply chain is sustainable over time, in line with Aratubo's sustainability strategy, based on **trusted management with stakeholders**.

Prevent and mitigate any negative consequences on human rights and the environment related to company operations, even when it did nothing to cause them.

Scope

This policy applies to all of Aratubo's product and service suppliers and involves **all sourcing and contracting processes**.

Basic Action Principles

Aratubo's responsible sourcing is also based on the valuation of its financial impact and the assessment of its environmental and social impact over the course of its lifecycle. Thus, the following are considered:

- > **Environmental criteria:** continuous focus on reducing consumption, using energy efficient products, eliminating waste and pollution and the potential circularity of purchased products or materials.
- > **Social criteria:** compliance with the applicable labour law in terms of occupational health and safety in each country where the operation is carried out, respect for decent working conditions and the rights of workers at supplier companies, preventing human rights violations and fighting against corruption in all forms.

Aratubo undertakes to

- > Interact with suppliers in accordance with its principles of **integrity, equity and transparency**, working with our suppliers to guarantee compliance with our management policies.
- > **Guarantee that we do not contribute to the violation of human rights, bribery or corruption in the supply chain.**
- > Apply Aratubo's **due diligence process** based on the result of its risk assessment in terms of human rights and environmental practices.

- > When a potential supplier is identified, the person responsible for approving them at Aratubo will assess said supplier's **risk of non-compliance** in terms of human or labour rights, anti-corruption and bribery, responsible environmental management and regulatory compliance.
- > Respect **human rights and the environment**, considering this respect to be one of the components for supplier performance assessments.
- > **Notify** suppliers that Aratubo has a **Code of Conduct**, a **Human and Labour Rights Policy**, an **Anti-Corruption Policy** and a **zero tolerance policy** for any regulatory non-compliance.
- > Formalise commercial agreements in writing including **clauses** to protect against failure to comply with the commitments set out in this policy. A supplier's failure to accept these clauses is a risk indicator and must be mitigated with appropriate alternative measures.

Monitoring and Oversight Systems

The **Sustainability Committee** and the sourcing managers periodically oversee the level of fulfilment of the commitments made in this policy. They also review it regularly to ensure it remains appropriate and is focused on adding value.

A due diligence process and whistleblower hotline are available to identify and handle potential and actual violations of the commitments set out in this policy.

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Alberto Lejarreta

Chief Executive Officer of Grupo Arania