

# SUPPLIERS

## CODE OF CONDUCT

# Introduction\_

Dominion's suppliers ("Supplier"), while independent organizations, play an important role in Dominion's value chain. For this reason Dominion promotes, encourages and expects its suppliers to adopt standards of conduct consistent with the **Code of Conduct** (available at [www.dominion-global.com](http://www.dominion-global.com)).

For Dominion, good ethics and a strong commitment to corporate responsibility and sustainable business practices are essential to manage the challenges and opportunities of a constantly and rapidly changing global environment. To fulfill this commitment, Dominion is a signatory to the United Nations Global Compact (UNGC) and is therefore committed to actively promoting the 10 fundamental principles that address human rights, the environment and the fight against the corruption. Likewise, it is committed to the values of the International Labor Organization (ILO).

The **Supplier Code of Conduct** ("Code") establishes the minimum principles that Dominion expects from its Suppliers, encouraging their knowledge and acceptance before entering into the contractual relationship and their compliance throughout the business relationship.

This Code articulates the minimum behavioral guidelines that can reasonably be expected from Suppliers throughout their supply chain, reflecting their commitment to respect for Human Rights, integrity and ethical behavior, environmental protection and safety, as well as such as the protection and transparency of information to promote a sustainable economy.

Suppliers, contractors, collaborators and all those involved in its supply chain must avoid any conduct that could damage the environment or harm Dominion, its subsidiaries and investee companies legally, economically or in terms of reputation.

For all these reasons, Dominion wishes to actively involve its supply chain and requests that all its suppliers adhere to this Code, urging them also to promote the adoption of policies and procedures to identify, prevent and mitigate the risks that may arise in the areas described.

Dominion makes available to its Suppliers the channel <https://www.dominion-global.com/en/esg/whistle-blowing-and-anti-harassment-report> through which they may communicate, anonymously and without fear of retaliation, facts that may be considered violations or breaches of the Dominion Code of Conduct. Dominion will adopt the necessary technical, organizational and functional measures to guarantee the confidentiality and security of the interlocutors and the information shared.



# DOMINION'S SUPPLIERS CONDUCT GUIDELINES

# 1. Compliance and ethical behavior

Dominion requires its suppliers to strictly comply with the laws of the countries in which it operates, as well as to behave ethically, honestly and with integrity in their business relationships, both with Dominion and with Third Parties. These Third Parties include government officials, customers, suppliers and members of the community.

## 1.1. Fight against corruption and fraud and prevention of money laundering and the financing of terrorism

Dominion does not tolerate any form of corruption, fraud, bribery, money laundering, terrorist financing, or any other illegal activity, and further requires its Suppliers to conduct all of their activities in accordance with the following principles:

- Always act with integrity in all their activities and not to engage in fraudulent activities.
- Not influence the will or objectivity of authorities and public officials and other persons outside the Supplier to obtain any benefit or advantage through the use of unethical practices or contrary to applicable law.
- Not give, promise or offer, directly or indirectly, any good of value to public authorities or officials or any natural or legal person, in order to obtain undue advantage.
- Do not allow any facilitation payments.
- Not finance or show support or support of any other kind, directly or indirectly, to any political party, trade union, its representatives or candidates.
- Do not use donations or liberalities to cover up improper payments to authorities or public officials or to entities other than the Supplier.
- Not request or receive improperly, directly or indirectly, commissions, payments or benefits from third parties on the occasion of or due to contracting, investment, divestment, financing or general expense operations carried out by the Supplier.
- Pay special attention to those cases in which there are indications of lack of integrity of the people or entities with whom business is going to be or is being carried out, to ensure that commercial relationships are established only with qualified people and entities, with an adequate reputation and with social, environmental and good governance commitments.
- Faithfully and adequately reflect all its actions, operations and transactions in its books and records.
- Promote internal training in the prevention and fight against corruption and fraud.
- Maintain special diligence regarding cases that may involve a potential conflict of interest between the employees and partners themselves and those of the Supplier.
- Have specific controls and procedures that allow you to prevent, detect and correct any conduct that may involve an act of corruption, fraud or a conflict of interest.
- Dominion requires its Suppliers to strictly comply with the applicable regulations in the fight against money laundering and the financing of terrorism. Do not carry out any activity that could damage the reputation or expose Dominion to any type of sanction and avoid payments to people or entities residing in tax havens or in bank accounts opened in bank offices located in tax havens.

# 1. Compliance and ethical behavior

## 1.2. Conflict of interests

The Supplier must act with transparency, applying good judgment and acting in good faith to avoid situations that may interfere with its contractual obligations with Dominion or pose a potential conflict of interest or be perceived as such and, where appropriate, communicate the same to Dominion. to prevent them from affecting the trust we place in them and damaging our reputation.

The Supplier will have mechanisms that guarantee the independence of the supplier's actions, in the event of a potential conflict between its interest and the personal interest of any of its employees.

## 1.3. Compliance with regulations on international sanctions and embargoes and export control

The Suppliers undertake not to maintain commercial relations or any other nature with sanctioned entities or individuals or in countries affected by international Sanctions.

In this sense, they will not be able to carry out activities or process payments, directly or indirectly or for the benefit, of natural or legal persons included in sanctions lists (including their subsidiaries), in countries or territories affected by a total embargo or that, for any other reason, are prohibited under the applicable international sanctions regulations.

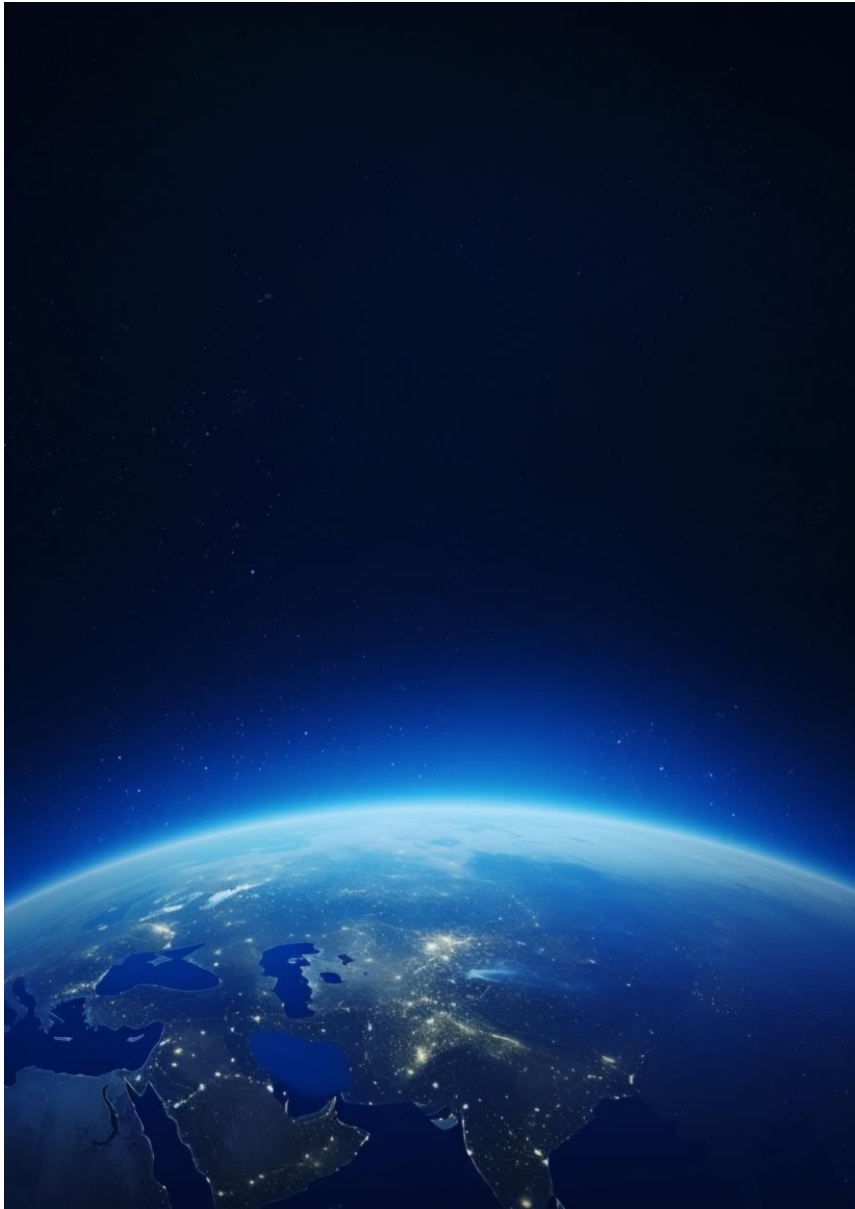
## 1.4 Defense of competition

The Supplier will refrain from carrying out price fixing agreements or any other practice contrary to competition regulations.

Likewise, it will not reach collusive agreements or actions that fail to comply with applicable competition legislation, both in those award procedures in which it participates, as well as during the execution of services. You must ensure that any third party you involve in your operations knows and respects said legislation.



## 2. Human Rights



Suppliers must respect internationally recognized Human Rights, including, but not limited to:

- The “International Bill of Human Rights”<sup>1</sup>.
- The principles relating to rights established by the International Labor Organization (ILO) regarding the Principles of Fundamental Rights at Work and the eight Fundamental Conventions<sup>2</sup> that develop them.

The Supplier’s responsibility to respect Human Rights requires that the Supplier prevent its own activities from causing or contributing to violations, and to address their consequences, mitigating adverse impacts.

In a non-exhaustive manner, the responsibility of guaranteeing respect for Human Rights implies for the Supplier:

- Maintain labor practices with its employees that are consistent with the international regulations described above, and especially eliminate all forms of forced or compulsory labor, human trafficking, slavery or servitude, and that all work is carried out voluntarily, without threat, of punishment or sanction, and not based on deception. Employees will not be allowed to pay recruitment fees or any other intermediary commission fees, or other fees related to their recruitment.

<sup>1</sup> The Universal Declaration of Human Rights (1948) is known as the International Bill of Human Rights, along with the instruments that develop it: the International Covenant on Civil and Political Rights (1976) and the International Covenant on Economic, Social and Political Rights. Cultural (1976).

<sup>2</sup> The eight Fundamental Conventions of the ILO include: Convention on Freedom of Association and Protection of the Right to Organize (1948), Convention on the Right to Organize and Collective Bargaining (1949), Convention on Forced Labor (1930), Convention on the abolition of Forced Labor (1957), Minimum Age Convention (1973), Convention on the Worst Forms of Child Labor (1999), Convention on Equal Remuneration (1951), Convention on Discrimination (1958).

## 2. Human Rights

- Not hire child labor or tolerate the use of child labor by its suppliers, child labor being understood as the type of work that deprives children of their childhood, their potential or their dignity, and that is detrimental to their physical or psychological development.
- Facilitate freedom of association and collective bargaining for its employees. Employees who non-violently exercise their union rights will not be penalized or subjected to harassment or intimidation.
- Treat all employees and any interested parties with dignity and respect, ensuring employees an environment free of intimidation, harassment and abuse.
- Unwanted or annoying behavior that constitutes harassment or creates an intimidating, offensive, abusive or hostile work environment will not be tolerated.
- Do not discriminate against anyone based on nationality, race, ethnicity, religion, political affiliation, marital status, social condition, age, disability, culture, sex, gender identity, sexual orientation or any other condition. Ensure that working conditions and environment (including: fair and competitive wages, working hours, work-life balance, maternity protection, confidentiality of employee records, promotion of a safe work environment, free from harassment, free from alcohol and drugs and free to leave their employment contract with reasonable notice, etc.) are consistent with applicable international labor standards, and that promote and maintain the highest degree of physical, mental and social well-being of its employees and subcontractors.
- Respect the rights, cultural diversity and customs of local communities and indigenous peoples who may be influenced by their activities.
- Recognize and respect the recognized Human Rights of people who belong to the most vulnerable groups or groups.
- Promote the hiring of local suppliers and contractors to enhance the business fabric and employment in the area of influence or regional.
- Workers and any interested party must have a grievance mechanism at their disposal, be adequately informed of it, that allows them to communicate any complaint or breach of this Code without risk of retaliation, and that allows its communication and management in a consistent, fair manner, accessible and fast.
- If a Supplier must face conflicting demands, it must seek alternatives that guarantee respect for internationally recognized Human Rights.



### 3. Safe and safety\_



Suppliers must carry out their activities in accordance with the occupational health legislation in force in each country of operation in order to ensure the safety of their facilities, products and services, paying special attention to the protection of their employees, contractors, clients and environment. local.

Suppliers must adopt appropriate measures, such as the implementation and execution of management systems, based on policies, procedures and appropriate prevention measures to prevent occupational diseases and work accidents. All this in order to provide a safe and healthy place of employment for its employees, as well as to provide the documentation and data necessary to contribute to the safe and healthy use by Dominion and interested parties of Dominion products suppliers.

In particular, when the activities are carried out in Dominion facilities or those of a Dominion client, the supplier must know and ensure that its employees and subcontractors comply with all the Health and Safety regulations that apply to them, developing the activities of necessary awareness and training.

Dominion is committed to providing a safe and healthy work environment for everyone who works in, accesses our facilities, or is affected by our operations. To fulfill this commitment, the contribution of all our suppliers is essential, and they must ensure that:

- Ensure strict and faithful compliance with current health and safety legislation and regulations of the service or operation performed and comply with all Dominion's specific health and safety policies.
- Identify and evaluate potential risk situations in the workplace and minimize their possible impact through the correct execution of plans and procedures.
- In the event of difficulty performing the work safely and in the manner determined by Dominion procedures, immediately inform the persons responsible for the service or operation. Where operational results and security conflict, suppliers should always opt for security.
- Provide your staff with the necessary means and training to carry out the work safely and all those specific to the job they perform.
- Report any accident or injury that may occur as soon as possible, and collaborate with transparency in the investigation.
- Promote among your staff the proactive identification of any unsafe condition or act that puts the integrity of people or facilities at risk and provide the necessary training and awareness to maintain an adequate perception of risks.

Dominion encourages its suppliers to:

- communicate to your management, employees and contractors your commitment to improving health and safety and provide training on this commitment
- apply for and maintain ISO 45001 certification or equivalent certification (where applicable)
- systematically evaluate health and safety performance through appropriate audits and progress reports.

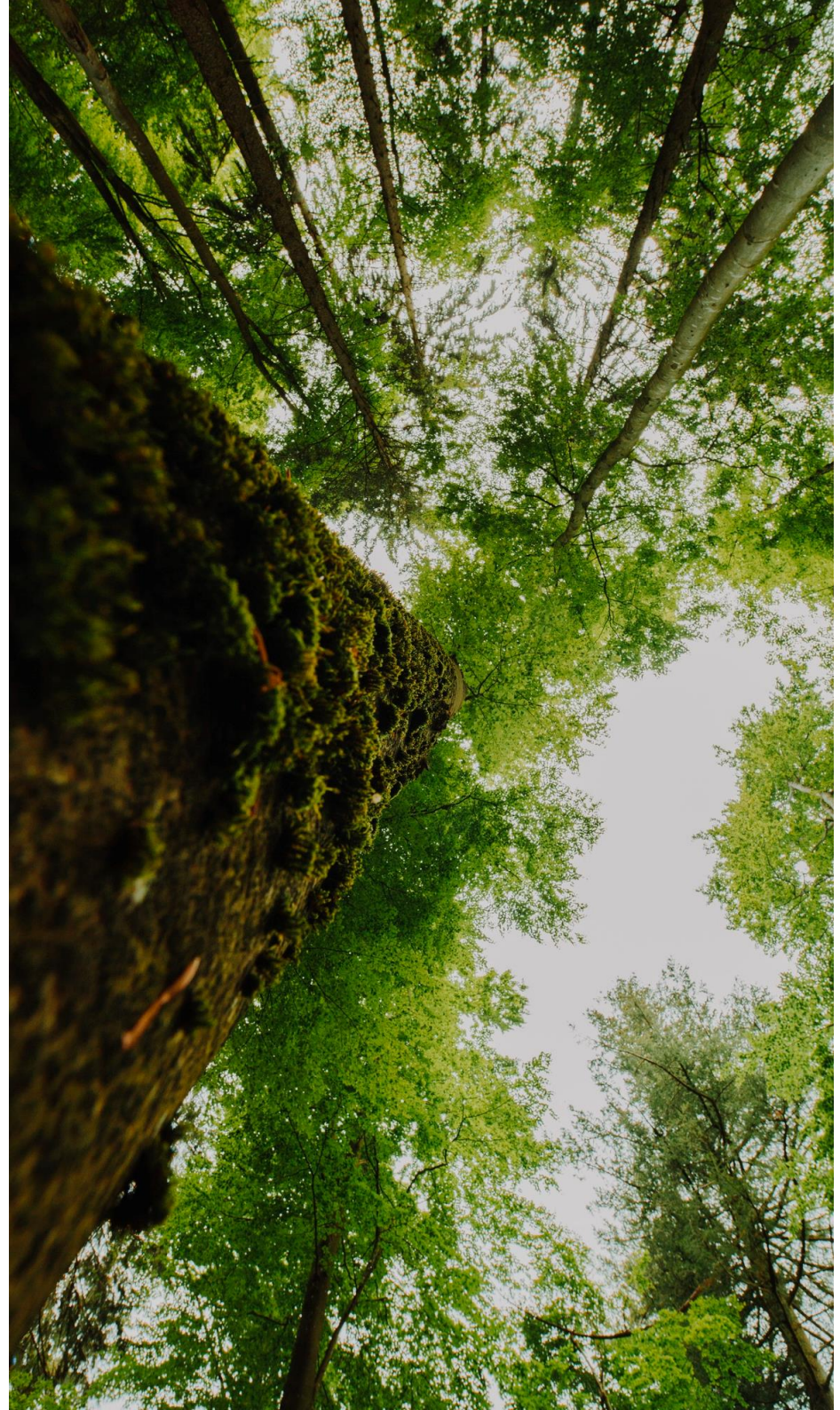


## 4. Environment

Suppliers must carry out their activities in accordance with the environmental legislation in force in each country of operation in order to minimize the possible negative impacts on the environment of their operations, adopting measures that combat climate change and promote the protection of natural capital.

In particular, Dominion suppliers must demonstrate their commitment, and extend it throughout their supply chain, to preventing pollution, improving energy performance, preserving the environment and improving Sustainability through:

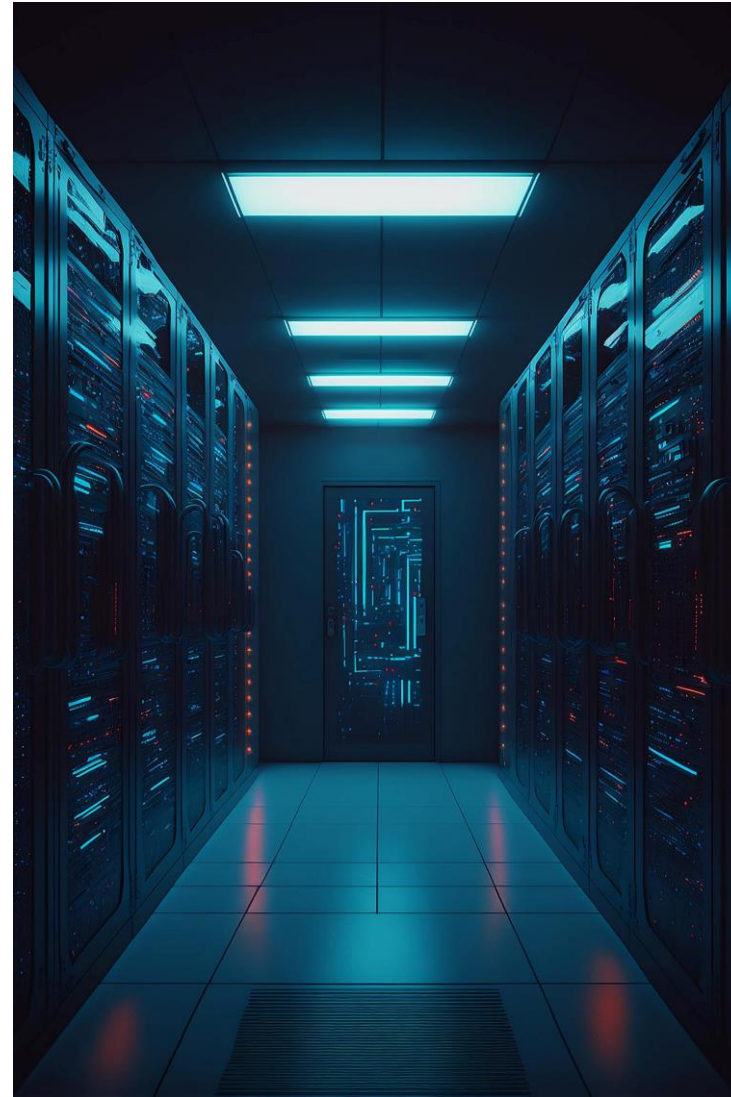
- Compliance with applicable environmental laws and regulations in the countries in which they operate and the commitment to continuous improvement of performance.
- The evaluation of the risks of impact on the environment, based on the principles of precaution, prevention, protection and continuous improvement.
- The implementation of integrated environmental management including water management, soil/subsoil management, protection and conservation of biodiversity, minimization of emissions into the atmosphere and efficient waste management.
- Carrying out efficient management of energy use and reducing unnecessary energy consumption.
- Promotion of the principles of the circular economy by optimizing the use of natural resources and raw materials, including energy and water resources, and efficiently managing waste through the application of the principles of the management hierarchy.
- Progress in the calculation and certification of the carbon footprint in its scopes 1, 2 and 3 and in the establishment of reduction objectives aligned with the Paris Agreement and the Science Based Targets.



## 5. Confidentiality, Protection of Personal Data and Intellectual Property

The Supplier must respect the principles of confidentiality and intellectual property regarding the information they access as a result of their relationship with Dominion, respecting the intellectual property rights of third parties and avoiding sharing or revealing information that belongs to Dominion without their express consent.

Suppliers who, on the occasion of the service provided, have access to personal data of employees, clients or users, must comply with current legislation, regulations and Dominion guidelines regarding their treatment (legality, loyalty, transparency or confidentiality), inform Dominion's data privacy officers of any unauthorized use, disclosure or loss of personal information.



## 6. Corporate image and reputation\_

Dominion considers its corporate image and reputation to be one of its most valuable assets.

Suppliers undertake to take the utmost care to preserve the image and reputation of Dominion in their professional actions.

Suppliers will never appear to speak on behalf of Dominion or refer to Dominion in their advertising without obtaining prior written authorization.

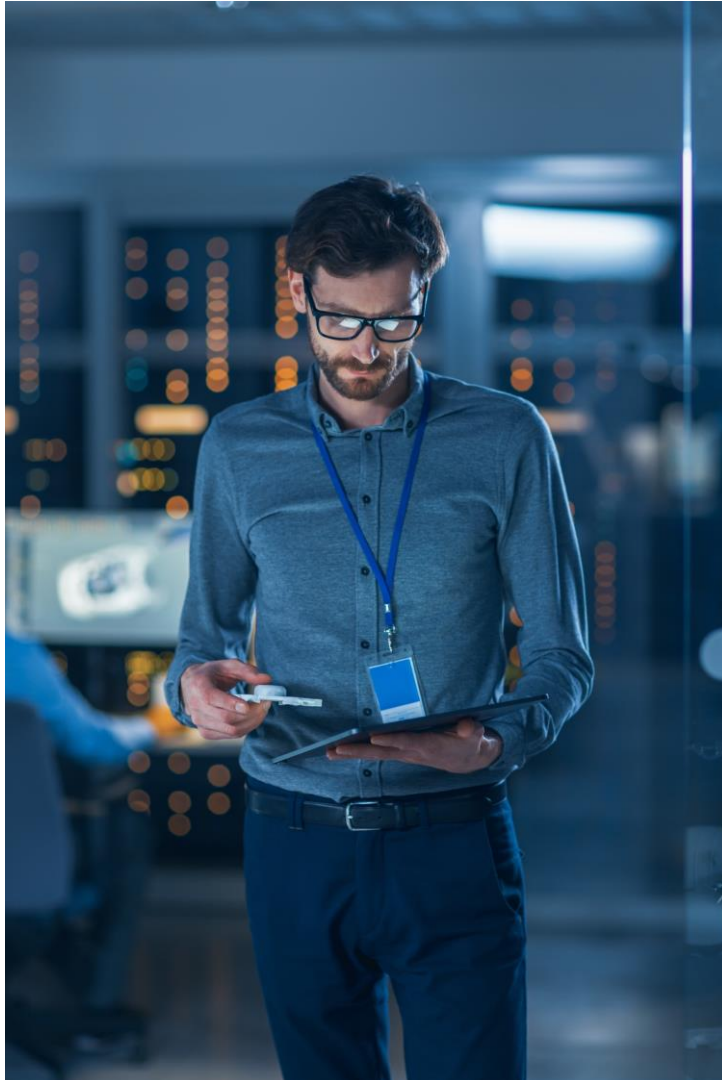




# RESPONSIBILITY OF SUPPLIERS



# Responsibility of suppliers\_



The Dominion Provider agrees to:

- Know, respect and comply with this Code, as well as other applicable internal Dominion rules, policies and procedures. In the event of a conflict between legislation and Dominion's internal regulations, the most restrictive one must be adopted.
- Implement policies, procedures, tools and indicators necessary to ensure compliance with the principles listed above
- Participate in verification activities for compliance with this Code or audits that Dominion may establish or require and implement corrective actions, if necessary, resulting from said verification activities.
- Communicate to Dominion any situation that they consider relevant in relation to the requirements established in this Code, which could directly or indirectly affect Dominion, whether legally, economically or reputationally.
- Disseminate the Code among its employees and companies with which it maintains an active contractual relationship to provide services to Dominion.
- When a supplier must face conflicting demands, it must seek alternatives that guarantee respect for internationally recognized human rights.

# Violation and breaches of this code\_

Failure by the Supplier to comply with the content of this Code will have consequences on the contractual relationship with Dominion. Ignorance of the applicable legislation, as well as the pressures and demands of business conditions, will not be admitted as a justification or defense against breaches of this Code.

Others involved in non-compliance will also be subject to disciplinary action. This includes those who do not perform due diligence to detect a violation, those who refuse to disclose information that may be important in an investigation, as well as supervisors who approve, consent, ignore, or attempt to retaliate.

Depending on the severity of the non-compliance, these actions will range from a mere warning to your disqualification as a Dominion Supplier; without prejudice to other legal or administrative actions that may be applicable.

Violations of this Code are analyzed on a case-by-case basis and will be sanctioned in accordance with all applicable internal procedures, agreements and legal requirements.





# APPENDICES



# Glossary\_

- **ASSET OF VALUE**

Cash or cash equivalent, compensation, gifts, loans, gratuities, advantages or benefits of any kind.

- **MONEY LAUNDERING**

It is the set of mechanisms or procedures aimed at giving the appearance of legitimacy or legality to goods or assets of criminal origin, and is not limited to cash transactions.

Engaging in such activities undermines our integrity, damages our reputation, and may expose Dominion and its employees to serious penalties.

- **CONFLICT OF INTEREST**

Occurs when the private interest of a supplier interferes in some way, including appearing to interfere, with the interests of Dominion.

- **CORRUPTION**

Offer, promise, grant, receive, request or accept an unjustified benefit, for oneself or for a third party, to unduly favor another in the acquisition or sale of goods, in the contracting of goods and services or in commercial relationships. It includes the public as well as the private or business sphere and also when the purpose or result of such conduct includes the breach of contractual, fiduciary or legal duties of the person corrupted or to be corrupted.

- **AUTHORITIES OR PUBLIC OFFICIAL**

Any person who works at the service of a publicly owned organization or institution, as well as those who participate in the exercise of public functions.

- **MOST VULNERABLE GROUPS OR COLLECTIVES**

People and groups that may be directly, differentially or disproportionately affected by the activity due to their disadvantaged or vulnerable status, including: indigenous peoples; national, ethnic, linguistic or religious minorities; children, older people, people with disabilities, and refugees, displaced people and migrant workers, as well as their families.

- **FACILITATION PAYMENT**

Small amount payment made to lower-ranking public officials, whose purpose is to expedite or facilitate the performance of their responsibilities, such as access to public services, obtaining ordinary licenses or business permits, administrative procedures, the provision of police protection or the loading or unloading of goods.

- **SUPPLIER**

This term is used in this document to refer to suppliers, contractors, sub-suppliers and subcontractors, and other third parties who supply goods and services to Dominion or anyone acting on Dominion's behalf. Therefore, the obligations assumed by the supplier are enforceable by its employees, sub-suppliers and subcontractors.

- **INTERNATIONAL SANCTIONS**

Restrictions or prohibitions of a commercial, economic or financial nature, including controls on the export of goods, services or technology, that a country or multilateral organization may adopt against countries, companies, individuals or groups of individuals that are held responsible for actions that violate human rights or threaten international peace and security.



# Signature of this document\_

By signing this document I **expressly and formally declare that I am committed to this Supplier Code of Conduct and guarantee its compliance during the duration of my relationship with DOMINION.**

Likewise, I guarantee to know the existence of the DOMINION Ethical Channel.

Supplier name	Legal representative name and charge	SIGNATURE

Place and data:.....



We are DOMINION

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