



SUPPLIER AND SUPPLIER-CHAIN MANAGEMENT

Internal Regulations – Corporate Policies

Date: November 2021

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Introduction

Approval of the Global Dominion Access, S.A., (hereinafter "**Dominion**") Supplier and Supply-Chain Management Policy (hereinafter, the "Policy") is yet another milestone in Dominion's steadfast commitment to lawfulness, ethics and professionalism that underpins how it conducts its operations and its corporate culture.

Pursuant to this Policy, Dominion is firmly committed to:

- | Complying with and fully adhering to all current legislation (both nationally and in the countries where it operates).
- | Complying with the principles that govern its Code of Conduct which forms the basis of the Policy set out here.
- | Training and raising awareness of the Obligated Parties (as this term is defined below), as well as stakeholders, of the importance of complying with this Policy.
- | Applying penalties for non-compliance with the provisions set out herein, pursuant to the applicable disciplinary measures.

Using this Policy, Dominion intends to establish the guidelines to follow when dealing with suppliers and managing purchases of goods and services, establishing an in-house preventive framework that eliminates or, at least, reduces any possible corruption during the course of its activities and serves as a guide and model to follow to combat corruption and fraud.

This policy is closely related to the [Anticorruption Policy](#) and the [Gifts and Hospitality Policy](#).

Scope of application

The Policy applies to all employees, managers and directors of all the companies that make up Dominion, whose professional responsibilities, assigned by Dominion, are either directly or indirectly related to managing suppliers and the supply chain (hereinafter "**Obligated Parties**"). For the purposes of this Policy, "Dominion" shall also mean all companies which Global Dominion Access, S.A. controls or may control, directly or indirectly, with control being understood to be:

- (i) holding the majority of the voting rights;
- (ii) the right to appoint or remove a majority of members of the Board of Directors; or
- (iii) holding the majority of the voting rights pursuant to eventual agreements made with third parties.

Likewise, all third parties who have dealings with Dominion will also indirectly receive this document and, whenever possible, must be made aware of the underlying principles and values.

General principles of conduct

Proper supplier management must encompass the entire lifecycle of a relationship with suppliers, i.e. approval, selection, contracting, monitoring and termination. Obligated Parties must apply the due diligence criteria and requirements that are approved by each area or division of Dominion for each different stage.

Expected Acts of Conduct

To achieve the established goals, Obligated Parties must:

- | Selecting suppliers using clear procedures, in an impartial manner and on an equal opportunity basis, avoiding any favouritism that could undermine free competition.
- | Not being influenced by personal relationships or interests of Obligated Parties when awarding or contracting a service. No Obligated Party can obtain any advantage from a contract award, and the acceptance of any item or incentive that could affect objective contracting criteria is forbidden.
- | Selecting suppliers whose conditions permit - through a contract - timely fulfilment of the previously established goals.
- | Adopting the contracting of suppliers committed to complying with current legislation, the Universal Declaration of Human Rights, the fundamental conventions of the International Labour Organisation, the principles of the United Nations Global Compact and respect for the environment.
- | Providing adequate communication that facilitates management, decision making and business relations, creating profitability for both parties.
- | Establishing continuous improvement and assessment procedures to help prevent risks.
- | Complying with the deadline and method of payment stipulated in the contract.
- | Advocating its suppliers to implement an organisational and management model to prevent corruption and fraud, as well as appropriate ESG objectives and improvement plans.

Dominion also expects the following from its suppliers:

- | Commitment to the objectives stipulated in the contract, complying with the agreed commitments on time and in the agreed manner.
- | That they will meet regulatory standards and comply with the quality requirements set by our customers for all products supplied and services rendered.
- | That they will meet the legislation, regulations and contractual agreements, refraining from any corruption, extortion or embezzlement practices.
- | That they will provide their employees with a safe working environment, protect their human rights and treat them with both dignity and respect, without engaging in discriminatory

practices, forced labour or child labour, adopting the commitments established in local and state laws, as well as in the Universal Declaration of Human Rights, the core conventions of the International Labour Organisation and the principles of the United Nations Global Compact.

- | That they will respect the environment by establishing measures to prevent any accidental leaks and discharges, as well as using natural resources in a responsible and economical manner, reducing energy consumption and greenhouse gas emissions.

Prohibited Acts of Conduct

As part of the measures Dominion has developed to combat all types of corruption and fraud in the course of its business activities, Obligated Parties must:

- | Not making or offering, directly or indirectly, any payment in cash, in kind or any other benefit to any natural or legal person at the service of any authority or entity, whether public or private, political party or candidate to a public post, in order to illegally obtain or maintain business or other advantages.
- | Not making or offering, directly or indirectly, any payment in cash, in kind or any other benefit to any natural or legal person so that they abuse their influence, real or apparent, to obtain or maintain business or other advantages from any authority or entity, whether public or private.
- | Not making or offering, either directly or indirectly, any payment in cash or in kind or any other benefit to any natural or legal person when they are aware that all or part of the money or kind will be directly or indirectly offered or delivered to any authority, public or private entity, political party or candidate to a public post, for any of the purposes mentioned in the above paragraphs.
- | Not making payments, in the form of money or objects of value, whatever the value may be, in exchange for ensuring or speeding up the course of a procedure or act involving any judicial body, public administration or official organisation.
- | Specifically, suppliers shall not make, offer or accept any payment in cash, kind or any other benefit from/to any natural or legal person, based on their contract with Dominion, in order to obtain or maintain any business or advantage for themselves or for a third party, which may lead to a conflict between the interests of the supplier or third party and those of Dominion.

Reporting Wrongdoings

All Obligated Parties and third parties have a Whistleblowing channel to report any conduct that may involve any wrongdoing or any illegal actions or any actions that go against the Code of Conduct or Policy. For further details regarding the Whistleblowing Channel, consult the [Code of Conduct](#).

Document sheet

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