

Supplier Code of Conduct

Our suppliers play a key role in our value chain

The procurement of
goods and services
represents 75% of our
emissions.



With this Supplier Code of Conduct (the “**Code**”), we **disseminate and promote our most essential principles and values** in the work and professional activity of supplier companies in all stages of the value chain.



Our Code is framed within the UN Global Compact and the universally accepted Ten Principles, within the areas of human rights, labor, the environment, and anti-corruption. As a guide, we also use the United Nations Sustainable Development Goals (SDGs) and the ILO Centenary Declaration for the Future of Work, among others.



We establish **proactive collaborations** in the fight against climate change, environmental degradation, and social challenges.



We seek to build **long-term relationships** with suppliers and subcontractors that conduct their business while having a positive impact on people and the planet.

Collaborative work and open dialogue

Lines of open communication

We foster feedback from suppliers about our performance and conduct.

SUPPLIERS AND SUBCONTRACTORS

Application of the Code's principles in their performance and supply chain

LUCTA

Internal compliance with the requirements set forth in the Code

External support

We offer the necessary support so that suppliers can develop their own processes for advancing in and improving the values promoted by the Code.

How do we ensure the responsible acquisition of raw materials, consumables, and services?

Most essential principles and values



Responsibility, integrity, and the fight against fraud and corruption



Human rights and child protection



Fundamental rights at work



Occupational health and safety



Care for the planet and animals



Cooperation and communication

Responsibility, integrity, and the fight against fraud and corruption

Compliance with this Code is mandatory for all suppliers who begin any commercial activity with Lucta.

At Lucta, we act in accordance with the principles of integrity, responsibility, and diligence. We are therefore firmly opposed to any form of bribery, extortion, or undue profit that could have an influence on commercial relations, and we expect fair, upright, and responsible behavior in the market from our suppliers.

**1**

Legal compliance. The actions of Lucta's suppliers must be guided by the compliance with local, national, and international legislation, and suppliers must have the necessary permits and authorizations for carrying out activities at their respective operating centers.

2

Conflicts of interest. Suppliers of Lucta must avoid and/or report situations in which their interests might come into conflict with those of Lucta.

3

Fair competition. Lucta's suppliers must conduct their businesses while respecting all applicable laws on anti-trust and on fair and just competition.

4

Privacy of intellectual property and the protection of information. Lucta's suppliers must protect the privacy of the confidential information of their suppliers, customers, consumers, and employees. Such information must be managed in compliance with current legislation regarding personal data protection and intellectual property rights.

5

Product quality and safety. Lucta's suppliers must guarantee that all supplied products and services meet the specifications required by Lucta and all current regulations and legislation regarding food quality and safety.

Responsibility, integrity, and the fight against fraud and corruption

At Lucta, we are firmly against corruption, bribery, money laundering, and terrorist financing, and we require that all operations and commercial activities with suppliers take place in strict compliance with our internal corporate policies.

**6**

Commitment to integrity and the rule of law. Lucta is proactive in and committed to the fight against corruption and fraud, and it emphasizes not only the importance of integrity, transparency, and diligence in commercial relations but also compliance with the current law to protect its reputation and operate within an ethical and legal framework. It therefore prohibits its suppliers from unduly influencing authorities or third parties to inappropriately obtain benefits.

7

Due diligence and transparency. Lucta's suppliers must exercise specific diligence to select their business partners, ensuring that they only enter into relationships with entities that have an appropriate reputation and share social and good governance commitments. Likewise, suppliers must avoid conducting transactions with entities or individuals that are located in tax havens or that have bank accounts in those jurisdictions.

8

Compliance and protection of reputation. Lucta requires that its suppliers strictly comply with laws against money laundering and terrorist financing. Especially, Lucta expects its suppliers not to carry out activities that could harm their reputation or expose the company to sanctions.

Human rights and child protection

Suppliers and subcontracted companies must safeguard and protect human rights, especially those of children.

**9**

Human rights. Lucta's suppliers must promote the necessary measures for ensuring compliance with the Human Rights set forth in the Universal Declaration of Human Rights of the United Nations.

10

Child labor. Suppliers must prohibit the use of child labor in any phase of their activities. Both the minimum age for working and laws on the hiring of young people must, regardless of the country, follow the conventions of the International Labour Organization (ILO) or follow national or regional law, depending whichever offers a greater level of protection. Young workers (under the age of 18 years) or legitimate members of internships at work experience locations must not perform hazardous jobs or work at night.

Fundamental rights at work

Suppliers must comply with all laws and standards referring to the labor practices of the countries where they might operate, have production facilities, or carry out their business activities.

At Lucta, we strive to maintain a work environment that favors the full development of all professionals and want our suppliers to respect the dignity of people, trust, cordiality, and teamwork.

**11**

Free choice of employment. Suppliers must prevent involuntary labor, slavery, servitude, forced or compulsory work, or human trafficking in their supply chains.

12

Freedom of association. Suppliers must recognize the freedom of association at work and the freedom to join unions, to seek representation, to belong to works councils, and to participate in collective bargaining.

13

Fair working conditions. Suppliers must ensure fair and equitable employment conditions and that the workday does not exceed the maximum limit established and permitted by the current legislation. The workday must not, in any event, exceed what is established as the maximum by the International Labour Organization. Staff remuneration must be in compliance with the salary management of the country in question.

14

Diversity and inclusion. Suppliers must defend equal treatment for employees and must prohibit the use of practices and decision-making based on race, sex, age, nationality, physical attributes, social origin, disability, union affiliation, religious orientation, civil status, pregnancy, sexual orientation, gender identity, or any other illegal criterion in accordance with legislation.

15

Fair treatment. Suppliers must provide their personnel with a respectful and dignified work environment that is free from violence and inhumane treatment.

Occupational health and safety

Our suppliers must respect the labor laws and regulations of the countries where they conduct their business.

Likewise, we are committed to suppliers that promote safe and healthy workplaces and that carry out the essential actions for reducing the risk of accidents among their teams.

**16**

Health and Safety Management System. Suppliers must provide information, training, and protection to their personnel related to chemical, biological, and physical risks; risks derived from the use of certain equipment; and tasks that involve considerable physical effort. Procedures related to safety, preventive maintenance, and adopting the necessary measures for technical protection must be periodically reviewed.

17

Management of chemicals. Suppliers must ensure the health and safety of their personnel and of the environment against the use of chemical agents, and they must prioritize the use of chemical agents that have lower risks.

18

Emergency management. Suppliers must identify and assess emergency situations and must minimize the impact thereof by designing and implementing preventive measures, emergency plans, and emergency response procedures. They must have resources for mitigating emergency situations within their facilities (independent and manually-activated alarm, clearly marked evacuation routes, teams and workers who are trained on first aid and fire-fighting). They must periodically perform and record evacuation simulations.

19

Working conditions. Suppliers must ensure adequate and healthy work spaces that are: clean, hygienic, well maintained, with adequate light and ventilation, heating if required, clean drinking water, and places that are available for providing teams with food and rest.

Care for the planet and animals

At Lucta, we have defined an environmental policy because we think that applying environmentally-friendly measures is a priority. Consequently, we also drive and promote respect for the environment among our suppliers.

**20**

Efficient use of resources, especially water and energy. Suppliers must use materials and resources efficiently. They must give priority to choosing reusable, recycled, and recyclable materials, and they must obtain materials based on local sustainable sources whenever possible. They must promote the necessary resources for making efficient use of energy and must give priority to energy acquired from renewable sources. Moreover, they must implement actions for minimizing the use of water and for treating waste water.

21

Circular economy and waste management. Suppliers must be responsible for the waste generated by their activities, ensuring proper recording, storage, handling, and transportation. In addition, waste shall be kept separate according to the hazard rating. Waste management will take into account the waste hierarchy: priority will be given to prevention, importance will be given to reuse and recycling, and final operations will be minimized (energy recovery and, ultimately, landfill disposal). To respect the hierarchy, opportunities to promote the circularity of materials will be identified and implemented in order to reduce, reuse, and recycle waste.

22

Prevention of pollution. Suppliers must implement environmental improvement plans to optimize environmental performance, and they must calculate the environmental impacts when assessing operational changes to structures. They must record and take the necessary measures due to any environmental complaint or due to the risk of pollution.

Care for the planet and animals

We seek to ensure that our suppliers monitor and work to reduce the emissions related to their activities. Moreover, we encourage suppliers to support biodiversity and respect for animals.

**23**

Climate action. Suppliers must, in absolute terms, reduce their emissions of pollutants and greenhouse gases, in line with the Paris Agreement to limit the temperature increase to 1.5° C.

24

Biodiversity and deforestation. Suppliers must commit to avoid deforestation and degradation of critical natural habitats in the supply chain. They must promote good environmental practices that support biodiversity and prevent its loss.

25

Animal welfare. Suppliers must guarantee that animals are treated humanely, minimizing pain and stress, throughout the entire value chain. They must minimize testing and prioritize alternative methods wherever possible and where these are scientifically valid and acceptable to regulators.

Cooperation and communication

We work across the company in coordination and together with players in the market to address common challenges. This connection with our suppliers is only established based on trust and close communication.



- 26** | **Communication.** Suppliers must undertake to report any breach of this Code of Conduct using Lucta's Ethical Channel.
- 27** | **Cooperation.** Suppliers must participate on projects of Lucta related to a sustainable supply and reducing the environmental impact, therefore supporting the workers and communities of producers.
- 28** | **Communication of sustainability criteria in the supply chain.** Suppliers must convey the criteria set forth in this Code to their own supply chain.
- 29** | **Copyright.** Suppliers must provide Lucta with the necessary data for assessing the sustainability of their business activities and compliance with this document.

By accepting and signing this Supplier Code of Conduct, you undertake to:

- ✓ Respect and adhere to the principles and provisions of this Code for as long as you continue to be a supplier of Lucta.
- ✓ Effectively participate in the activities that may be established by Lucta for verifying this Code, therefore cooperating at all times and providing any necessary information.
- ✓ Diligently implement the pertinent corrective actions, if necessary.
- ✓ Notify Lucta in a timely manner of any relevant information related to the requirements established in this Code.

At Lucta, we only work with suppliers that sign and adhere to this Code of Conduct. By signing the Code of Conduct, the supplier not only acknowledges having read and understood the terms and conditions set forth in the same, the supplier also confirms the acceptance hereof, as well as adherence to and the commitment to comply with the same.

Name

Position

Organization

Date

Signature

