



Supplier and collaborator Code of Ethics and Conduct Introduction

Although they are independent organisations, suppliers and collaborators are actively involved in the value chain of Fundación Repsol's activities. That is why Fundación Repsol encourages and motivates them to be familiar with its Code of Ethics and Conduct in order to follow the conduct guidelines contained within it.

This code, marked by an ideal of cooperation, is aimed at mutual benefit, always respecting the role of each party. Fundación Repsol believes that its suppliers and collaborators must uphold the minimum conduct guidelines detailed below in order to perform their activities properly.

Conduct guidelines for Fundación Repsol suppliers and collaborators

1. Legislation in force

Fundación Repsol suppliers or collaborators must comply with applicable legislation in the countries in which they operate, avoiding any conduct that, although not illegal, may damage the reputation of Fundación Repsol and/or lead to adverse consequences for Fundación Repsol, the Repsol Group in its capacity as founder and/or their respective fields. When the supplier or collaborator is faced with conflicting demands, they must seek alternatives that allow them to respect internationally recognised human rights.

2. Human rights

Fundación Repsol suppliers or collaborators must respect human rights as internationally recognised and set out in the "International Bill of Human Rights" ¹ and principles relating to the rights included in the eight Fundamental Conventions ² of the International Labour Organisation, according to its declaration on fundamental principles and rights at work. The responsibility of the suppliers or collaborators to respect human rights requires them to prevent their activities from causing or contributing to any negative consequences relating to human rights, to address these consequences if they should occur and to try to prevent or mitigate negative consequences relating to human rights directly linked to operations, products or services provided by their suppliers.

¹ The International Bill of Human Rights is the Universal Declaration of Human Rights (1948) together with its implementing instruments: the International Covenant on Civil and Political Rights (1976) and the International Covenant on Economic, Social and Cultural Rights (1976).

² The eight Fundamental Conventions of the ILO include: Convention on Freedom of Association and the Right to Form Unions (1948), Convention on Freedom of Association and Collective Bargaining (1949), Convention on Forced Labour (1930), Convention on the Elimination of Forced Labour (1957), Convention on the Minimum Working Age (1973), Convention on the Worst Forms of Child Labour (1999), Convention on Equal Pay (1951), Convention on Discrimination (1958).

The responsibility of suppliers and collaborators to respect human rights includes, but is not limited to:

- Maintaining labour practices for its employees that are consistent with the above international regulations.
- Eliminating all forms of forced labour.
- Eradicating the use of child labour.
- Facilitating the freedom of association and collective bargaining of its employees
- Treating all employees with dignity and respect, refraining from any offensive conduct or that which entails any kind of discrimination on the grounds of race, religious, political or union ideologies, nationality, language, gender, marital status, age or disability.
- Ensuring that working conditions and environment (including: salaries, working hours, protecting maternity rights, encouraging a safe working environment free from alcohol and drugs, etc.) are consistent with internationally applicable labour regulations, and that they promote and maintain the highest level of physical, mental and social well-being for employees.
- Recognising and respecting the rights of individuals who belong to vulnerable groups when supplier or collaborator activities take place in areas inhabited by these groups.

3. Ethical behaviour and measures against bribery and corruption

The supplier or collaborator must, at all times, uphold ethical behaviour that allows them to establish legitimate and productive relations with their own suppliers and companies with whom they have a contractual relationship. They must act with honesty and integrity in all their contacts and relations, whether commercial or otherwise, with public or private entities in any country in which they operate.

The supplier or collaborator must establish mechanisms to allow them to combat any kind of corruption or bribery when conducting their activities. This entails, but is not limited to:

- 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 two 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 or collaborators 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 Fundación Repsol, 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 collaborator or third party and those of Fundación Repsol.

4. Safety and Environment

Performing their activities in order to minimise negative environmental impacts according to the legislation in force in each country of operation, and meeting a high level of safety in their facilities, products and services, with particular attention given to protecting employees, contractors, customers and the local environment.

5. Confidentiality

Suppliers or collaborators must respect the principles of confidentiality with respect to the information they have access to in carrying out their professional activity as a result of their relationship with Fundación Repsol.

Responsibility of collaborators and suppliers

Fundación Repsol suppliers or collaborators undertake to:

- Respect this code while they hold the status of Fundación Repsol supplier or collaborator.
- Take part in the activities established by Fundación Repsol to verify this code.
- Implement the corrective actions, if necessary, resulting from any verification activity carried out by Fundación Repsol in their organisation.
- Notify Fundación Repsol of any information considered relevant regarding the requirements set out in this code.

Infringement and violations of this code

Violations of the content of this code by the supplier or collaborator may have various consequences affecting the contractual relationship with Fundación Repsol.

Depending on the seriousness of the violation, these may range from a mere warning through to the supplier's disqualification as a Fundación Repsol supplier or collaborator, without prejudice to any other legal or administrative proceedings that may apply.