



# Code of Ethics for STRACON Suppliers

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## 1. PURPOSE

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- STRACON maintaining business relationships with a large number of suppliers, establishes rules of conduct through which it promotes and strengthens its commitments to all parties that are strategically related to its activities.
- STRACON and all of its companies in the various countries in which they are located require their suppliers and their subsidiaries, affiliates, employees, agents and subcontractors (collectively, STRACON's "suppliers") to conduct their business in a responsible, honest and transparent manner and therefore require them to comply with the following principles and to establish and implement internal policies to ensure such compliance:

## ▀ Ethics and integrity

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- It is vitally important that STRACON's suppliers operate with respect, honesty, transparency, efficiency, passion, responsibility, quality work and fair conditions within the processes. All our suppliers must be ethical in all aspects of their business, including relationships, practices, sourcing and operations.
- Sexual harassment of any kind is not permitted at STRACON. We are committed to encouraging a good working environment to the fullest extent possible and respect for life in all its expression. In this regard, all STRACON's suppliers must implement the appropriate mechanisms required by country regulations to prevent such acts.



## ▀ Human rights and working conditions

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- All STRACON's suppliers must prioritise the protection of the human rights of all their employees, treating them with dignity, fairness and respect, without promoting discrimination of any kind, allowing everyone to develop to their full potential.
- Our suppliers must respect and report child labour (they must not hire any worker younger than the legal minimum age for employment in the relevant jurisdiction), respect freedom of labour association and the right to collective bargaining, and reject any form of forced or compulsory labour. Transactions with third parties who are implicated in human rights violations, as direct perpetrators or accomplices, are prohibited.
- All employees of our suppliers must be assured that they will be measured on the basis of their ability to perform the work, regardless of gender, race, religion, sexual preference, ideology or community to which they belong.
- All STRACON's suppliers must comply with all applicable laws and regulations relating to the work and the workplace (including those relating to payment of wages and compensation, working time, etc.).
- In case of any issues, they must be reported in accordance with our code of ethics and through our ethics hotline STRACON LISTENS, our official means for reporting unacceptable or unethical behaviour.



## ▼ Safety and Occupational Health

- STRACON's suppliers shall provide a safe and healthy working environment for their employees, including adequate controls, work procedures and industrial safety equipment, in accordance with general and activity-specific risk types with the provisions of the corresponding regulations. Representatives of suppliers working at any site and their companies must respect and abide by the safety rules and standards of the site during all processes.
- Likewise, all STRACON's suppliers must comply with all requirements described in the procedure "HSE Requirements for Contractors"

## ▼ Environment

At STRACON, it is a priority to act in a way that mitigates environmental impacts as much as possible in all operations, preventing contamination of the areas in which we operate, continuously improving our management systems in favour of the conscious and optimal use of resources. All our suppliers must have clear processes that guarantee effective care of the environment and compliance with the corresponding regulations in accordance with current law; they must have the environmental licences and permits that allow them to make use of natural resources and promote the conservation of nature in all its expressions.

## ▼ Financial Controls, Bribery and Corruption

- STRACON's suppliers are required to have all their accounting documentation in a clear, true, accurate, orderly and up to date manner, enabling effective verification of the source of funds. In addition, all STRACON's suppliers are expected to engage only in ethical dealings in all aspects of their operations.
- No STRACON's supplier should attempt to influence others, directly or indirectly, to neglect their duties, obtain preferential treatment during negotiations or the award of a contract, or in any other circumstances by making or offering to make any improper payment, gift or favour, or engaging in any other unethical behaviour under any circumstances.

## Gifts, Entertainment, Business Courtesies

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Under no circumstances should employees of STRACON's suppliers offer gifts, courtesies, gifts of money or their equivalent, with the intention of influencing the decision making of STRACON's personnel. Similarly, suppliers must refrain from accepting gifts or courtesies from STRACON's employees for such purposes.

## Protection of information

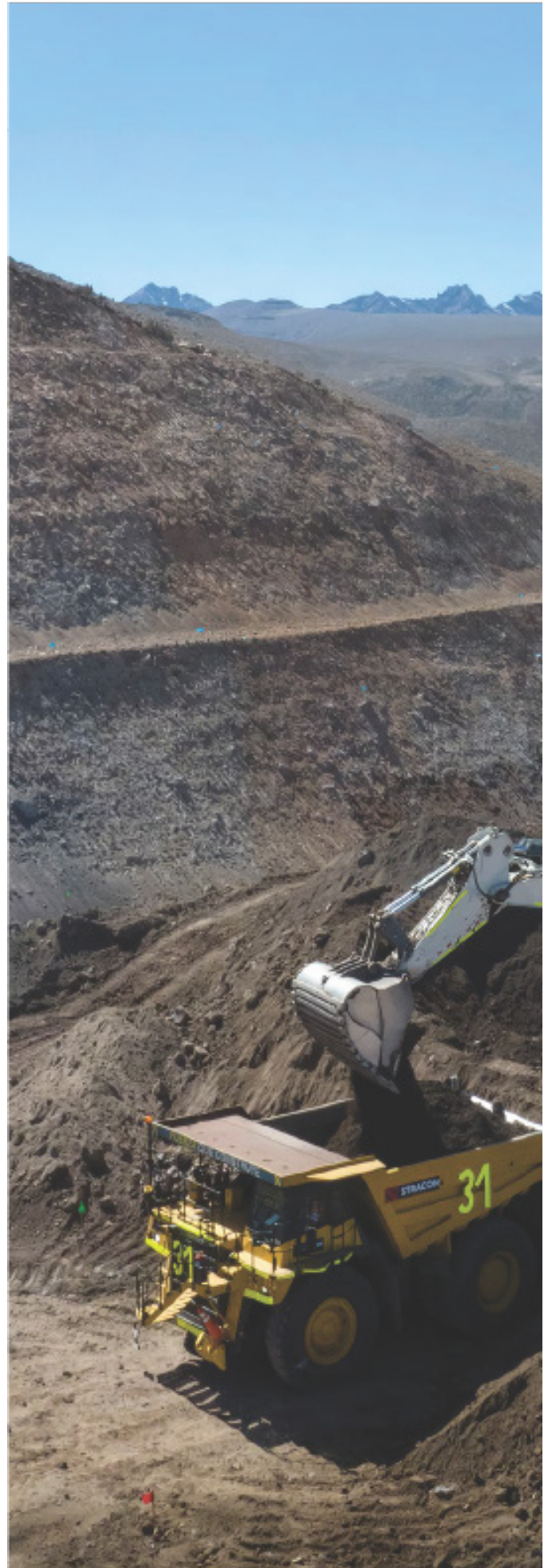
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All information provided to and shared with suppliers as a result of a business relationship is considered restricted and confidential and may only be disclosed with the express authorisation of STRACON. It is the suppliers' responsibility to adopt sufficient security measures to protect the information of STRACON and its related companies and to ensure that they are complied with by their employees.

## Quality

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STRACON's suppliers shall comply with the applicable quality-related standards for raw materials, packaging material, inputs and services supplied. In addition, they shall comply with all contractually agreed quality requirements in order to provide goods and services that meet the needs of STRACON and its related companies.



## ▼ Selection and Contracting

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- At STRACON, the selection and contracting of its suppliers is carried out in accordance with the rules established by STRACON for the selection, evaluation and monitoring of suppliers within the principles of respect, transparency, loyalty and good faith. No STRACON's employee may hire, supervise or influence the terms and conditions of hiring or evaluation of a family member working for a supplier. Under no circumstances should suppliers related to family members be supervised.
- All STRACON's suppliers must submit their declaration of potential conflict of interest at the time of contracting. It is considered gross misconduct for a supplier to have knowledge of a conflict of interest at the time of contracting and to fail to disclose it. Suppliers shall conduct their business in a manner consistent with fair competition and in accordance with all applicable laws and regulations protecting free competition.

## ▼ Legal Compliance

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STRACON's suppliers must at all times comply with all applicable laws and regulations. Where the law and this Code address the same issue, suppliers should apply the provision that offers greater protection.

## ▼ Advertising

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Suppliers shall not share with any third party any information issued by or given to STRACON, nor shall they issue communications or promote or advertise any STRACON related links and/or information without first obtaining STRACON's prior written approval. Any information issued by or given to STRACON, by any means whatsoever, shall be considered confidential information and shall not be disclosed without its consent.



In order to monitor compliance with this Code, STRACON may request its suppliers to provide documentation or ask them to conduct on-site audits and report on their findings. STRACON expects its suppliers to engage and implement appropriate corrective actions. In some cases, STRACON may review and suspend its relationship with the supplier.

## 2. REFERENCES

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Documents	Link for download
Guide STRACON LISTENS	<a href="https://www.straconteescucha.com/">https://www.straconteescucha.com/</a>
Code of Ethics	
PCLAFT Policy	
PCLAFT Manual	
PROCEDURE "HSE Requirements for Contractors "	<a href="https://goo.su/IBLFd0">https://goo.su/IBLFd0</a>



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