



CODE OF CONDUCT FOR COMPANY SUPPLIERS

INTRODUCTION

The company Industrias Oja-Rem SL believes that excellence in the manufacture and sale of components for the automotive industry should go hand-in-hand with honest and responsible business conduct. We acknowledge that our social and environmental impact extends all the way through our value chain, and as such we consider our suppliers to be strategic partners in securing a sustainable future. We present below this company's Code of Conduct in which we seek to reinforce our commitment to ethical behaviour and to sustainability in the supply chain, establishing the standards that must guide our joint operations while ensuring compliance with the highest levels of integrity and respect for human rights and the environment.

AIM AND SCOPE

This Code of Conduct defines Industrias Oja-Rem SL's minimum requirements and expectations with regard to sustainability and ethical behaviour in its supply chain. This Code applies to all suppliers, contractors, and trade partners. Likewise, we ask that our suppliers pass on and apply these same standards to their own suppliers, thereby ensuring due diligence throughout the chain.

In order to ensure the integrity of our value chain, the following conduct provisions constitute the basis of the ethical principles that are to guide the actions of our suppliers. These principles are based on the international standards of the International Labour Organization (ILO), the United Nations Global Compact, and the specific sustainability requirements of the global automotive industry defined by the Drive Sustainability partnership. Compliance with the aspects set out below will ensure a commercial relationship based on transparency, the mitigation of risks, and continuous improvement in social and environmental performance.

Commitment I

HUMAN RIGHTS AND WORKING CONDITIONS

Our suppliers must commit to respecting Human Rights and Public Freedoms. This explicitly includes:

- **Eradication of Child Labour:** The recruitment of minors is prohibited under ILO regulations and the Global Compact.
- **Modern Slavery:** Total prohibition of any form of slavery, forced or compulsory labour, and human trafficking.

- **Ethical Recruitment:** Recruitment processes must be fair, lawful, and transparent.
- **Salaries and Benefits:** Payment of remuneration in accordance with the Law, respecting internal equity and non-discrimination.
- **Working Hours:** Strict compliance with the legislation in force governing working hours and rest periods.
- **Diversity and Inclusion:** Promotion of equal opportunities between men and women, and respect for the rights of minorities and indigenous peoples.
- **Freedom of Association:** Respect for the right to freely join a trades-union and collective bargaining.
- **Rights over the Land:** Respect for rights over the land, forests, and water, avoiding any kind of forced eviction.

Commitment II
HEALTH & SAFETY (H&S)

The supplier must ensure a safe working environment that minimizes risks in relation to:

- **Risk Management:** Implementing measures for the prevention of accidents and fires, and making preparations for emergencies.
- **Machine Safety and Ergonomics:** Ensuring that equipment is safe and that the workplace is in compliance with adequate ergonomic standards.
- **Personal Protection:** Supplying personal protective equipment (PPE) and training in how to use it.

Commitment III
BUSINESS ETHICS AND GOVERNANCE

Integrity and transparency are fundamental pillars that underpin the identity of our organization. As such, our suppliers must make a formal commitment to act in accordance with the highest ethical standards, ensuring that all of their operations are conducted honestly, fairly, and with full legal compliance. To this end, the supplier shall:

- **Conflicts of Interest:** Avoid any situation in which personal interests interfere with professional objectivity.
- **Data Protection:** Ensure the confidentiality and privacy of information in accordance with the legislation in force.
- **Fair competition:** Respect anti-trust and unfair-competition laws.
- **Counterfeits and Intellectual Property:** Only work with original materials, respecting third-party industrial property rights.

- **Financial responsibility:** Accounting records must be accurate, true, and show a fair image of the transactions.

Commitment IV

ENVIRONMENTAL PROTECTION

The supplier shall perform its activity under the premise of continuous improvement of environmental performance:

- **Decarbonization and GHGs:** A commitment to reduce greenhouse-gas (GHG) emissions and to energy efficiency.
- **Resource Management:** The responsible use of water, the promotion of renewable energies, and the protection of biodiversity.
- **Chemical Waste:** The sustainable management of resources, the reduction of waste, and the responsible handling of chemicals.
- **Animal and Soil Welfare:** Respect for animal welfare and preservation of soil quality.

Commitment V

REDRESS AND AUDITING

Industrias Oja-Rem SL promotes a culture of transparency and mutual responsibility. In order to ensure the effectiveness of this Code, the supplier must ensure there are supervisory mechanisms and communication channels that allow any deviation from the standards specified here to be identified and corrected, in accordance with the following:

- **Ethics Channel:** Suppliers must allow their employees to report possible breaches anonymously and without reprisals.
- **Verification:** Industrias Oja-Rem SL reserves the right to carry out second- or third-party audits to ensure compliance with this Code.

In Amorebieta-Etxano, on 7 January 2026

Begoña San Miguel

Managing Director