



# SUPPLIER CODE OF CONDUCT

May 2023

## PURPOSE

At **Truck and Wheel Group, S.L.** and all its subsidiaries, hereinafter "**TWG**", we are committed to carrying out all aspects of our business ethically, with integrity and in compliance with all applicable laws. This commitment is a source of pride and strength for **TWG** and should be embraced by all our suppliers, their workers, employees and subcontractors.

In our aspiration to be the first choice for our clients, we have implemented a strict set of ethical standards to guide us in our business practices. These standards are intended to reflect the values that set us apart – which we express in our Code of Ethics – and that help to add value to the communities where we operate, provide an inclusive, respectful and safe working environment, and minimize our environmental impact while adhering to transparent, reliable and mutually reliant business practices.

This **Supplier Code of Conduct of TWG**, hereinafter "**SCC**", is a key component of our ongoing commitment to integrity, trust, honesty, fair dealing and full compliance with all applicable laws, and sets the minimum standards we expect from them. This SCC sets out the fundamental principles that should guide the behavior of all the suppliers that **TWG** works with.

**TWG** does not condone the illegal or unethical behavior of its suppliers, and selects them using a fair procurement process. This SCC details the minimum standards required, and complements the terms and conditions of the purchase contracts of Suppliers with those of **TWG**.

### 1. Scope of application

This SCC applies to all Suppliers that over the course of their business activity maintain a relationship with **TWG** when providing services or providing goods, regardless of their nationality and the place where the services are rendered (the "**Supplier**" or the "**Suppliers**"). In this SCC, the term Supplier also includes independent contractors and subcontractors that provide goods or services for or on behalf of **TWG**.

### 2. Commitment to comply with the Law

The Supplier must comply with all the laws that are applicable to its business at all times, taking into account the spirit, purpose and letter of the laws. The supplier must endorse the United Nations Universal Declaration of Human Rights, the European Convention for the Protection of Human Rights and Fundamental Freedoms, the United Nations Convention against Corruption, as well as the 1998 International Labor Organization Declaration on Fundamental Principles and Rights at Work, in accordance with national laws and practices.

At **TWG**, we expect our Suppliers, in addition to complying with the provisions of this SCC, to (i) communicate the established principles to their own employees, suppliers and supply chain; (ii) conduct periodic evaluations (including of third parties) in relation to compliance with this SCC; (iii) carry out necessary training actions to ensure that their employees and their supply chain read, understand and act in accordance with the content of this SCC; (iv) adopt the necessary policies and procedures to ensure compliance with this SCC; (v) maintain records and the corresponding evidence to demonstrate their compliance; and (vi) collaborate with **TWG** to evaluate their due compliance and take corrective measures if appropriate. Likewise, if there is any conflict between the principles of the SCC and national laws and regulations, the Suppliers must comply with the contents of the highest-ranking standard. If any of the standards of this SCC is found to contradict the provisions of the applicable legal provisions, **TWG** expects the affected Suppliers to report this circumstance and work with **TWG** to find a solution that complies with both the applicable legal provisions and, to the extent possible, this SCC.

### 3. Commitment to Human Rights and Labor Practices

Over the course of its corporate activity and labor relations with all those parties with which it collaborates or engages in commercial activities, **TWG** is steadfast in its commitment, association and firm respect toward its partners, regardless of the contractual relationship, its nature or dependency. As a result, the company fully rejects:

#### 3.1 Child labor

Suppliers may not use, employ or permit the work or performance of tasks by persons below the legal minimum age, and therefore must comply with the ILO Principles, in particular Convention No. 138 and No. 182, concerning the minimum work age.

Suppliers must contribute to the eradication of child labor so that all employees are above the minimum legal age required to work in the country where they operate.

#### 3.2 Forced labor and modern slavery

All work must be voluntary; as a result, Suppliers must not use any form of forced, bonded or compulsory labor or modern forms of slavery. Punishment, mental and/or physical coercion, as well as any other form of human trafficking are prohibited.

The employees of Suppliers must not be required to deposit money or make any payment related to obtaining employment throughout the hiring process or for the duration of their employment relationship. Under no circumstances can Suppliers retain the identity documents of their employees, who must be able to quit their employment voluntarily and freely without any threat to themselves or their families.

At **TWG**, we understand that modern slavery is a violation of a fundamental human right, and that it includes, among its various forms, forced labor and human trafficking. This violation threatens the freedom of people, so its prevention, identification and reporting are a top priority for our supply chain and must be complied with. In keeping with this aspect, our Suppliers must comply with due diligence obligations regarding their own supplies from conflict-affected regions and high-risk areas, which may contribute to human rights violations.

**TWG** Suppliers must comply with all applicable local laws and terms of collective bargaining agreements with respect to working hours, including overtime, breaks, and paid vacation. The terms and conditions of employment, including wages, will be presented to employees in an understandable manner in the local language, and they must be legal and reasonable.

#### 3.3 Discrimination and Inequality of Opportunities

At **TWG**, we encourage the diversity and plurality of our employees and do not tolerate discrimination in any of its forms. Our Suppliers will therefore not allow discrimination on the basis of race, ethnic or national origin, gender, sex, age, disability, ideology, nationality, language, religion, sexual orientation or identity, indigenous condition, union membership or any other personal or social condition of their employees.

The Supplier will promote an inclusive work environment that values the diversity of its employees. Supplier policies must also comply with all applicable laws and regulations that prohibit unlawful discrimination in employment decisions related to hiring, salary and benefits, promotion, and access to training.

Respect for people is one of the pillars of our company, which is why our Suppliers are prohibited from carrying out any action that could violate or harm their dignity.

In accordance with our Commitment to Human Rights and Labor Practices, at **TWG** we encourage our Suppliers to act properly in keeping with the following principles:

### **3.4 Promotion of Collective Rights and free association**

Our Suppliers must recognize and respect the right to association, affiliation and collective bargaining in accordance with applicable local laws, and their employees must be free to join or not to join a representative union of their choice, free from threats or intimidation.

### **3.5 Promotion of Occupational Health and Safety**

Suppliers must provide all employees with a safe and healthy work environment that is in accordance with the applicable laws and regulations. They must also provide specific training in the local language and supply the appropriate personal protective equipment (PPE) needed to minimize the health and safety risks associated with their respective jobs. The facilities, therefore, must remain clean and offer safe drinking water. Third parties must be protected and work-related accidents, injuries and diseases in the areas where they carry out their activities must be prevented.

## **4. Environmental Protection**

Our Suppliers must comply with all applicable environmental laws, regulations and standards, as well as implement an effective system to identify and eliminate potential hazards to the environment, ensuring that all activities are carried out in a responsible manner in order to minimize their impact on the environment, and maintaining commitments to quality and sustainability.

There must be processes and policies to actively improve the efficient use of raw materials, energy and water in order to minimize the emission of greenhouse gases (GHG), properly dispose of waste, provide constant training to employees on environmental protection, and report to us their initiatives for continuous improvement and actions aimed at responsible and sustainable management.

## **5. Anti-corruption and anti-bribery**

At **TWG**, we do not tolerate, allow or engage in any type of corruption in any of its manifestations in the performance of our commercial activity, neither in the public nor in the private sector. We promote a culture of prevention that absolutely overrides any potential type of economic or other benefit. To this end, we have specific risk assessment procedures and relevant controls that guarantee ethical and responsible behavior, in addition to the training of our own employees.

Therefore, our Suppliers must comply with an identical commitment and have Policies and procedures to prevent and detect these behaviors, and provide appropriate training to their employees in order to guarantee the standards that **TWG** promotes.

## **6. Prevention of money laundering and terrorist financing**

At **TWG**, we ensure, through internal procedures, that the commercial activities that we manage in all the territories where we operate stem from legal activities. Consistent with this, our Suppliers must act diligently in an environment of legality and transparency. This means, among other things, keeping timely financial records that reflect transactions accurately and honestly, and employing due diligence processes.

## 7. Conflict of interest

At **TWG**, we regard conflicts of interest as undermining independence and objectivity, and thus as interfering with the ability to perform contractual duties and obligations in an objective manner. Because of this, we expect our Suppliers to (i) apply an appropriate Policy in this regard that effectively covers professional conflicts and/or that could affect business relationships, and (ii) avoid any activity that creates a conflict of interest or the appearance of a conflict of interest that calls into question the objectivity or loyalty to **TWG**.

## 8. Market and Competition

At **TWG**, we are committed to competing in the markets fairly and not to make advertising that is misleading or that denigrates our competition or third parties, and we abide by the laws of free competition in all the places where we operate. We expect this same commitment from our Suppliers in their commercial activities at every level, in order to prevent abusive acts either from exchanging confidential information with their competitors, or that serve to limit the free market. Our Suppliers must comply with all applicable competition and antitrust laws.

In addition, our Suppliers must not engage in or facilitate commercial activities with entities or individuals that fail to comply with legal requirements on international trade and commerce, and they must comply with all applicable export controls, sanctions and customs laws and regulations. Likewise, they must apply our same ethical standards to their own supply chains as part of the fulfillment of their contractual obligations.

## 9. Confidentiality of Information and Professional Loyalty

In line with the above provision, at **TWG** we believe in the importance of protecting the confidentiality, integrity and availability of information, so our Suppliers must safeguard and make appropriate use of confidential information and must comply with applicable data protection laws, including, and in particular, the security of the personal data of customers, consumers and employees during its collection, registration and processing, that is, throughout the life cycles of the information.

## 10. Quality

A central pillar of **TWG** is its commitment to achieving the highest levels of client satisfaction, which is why we strictly adhere to and respect all applicable regulations, guidelines, rules, policies and criteria to ensure the highest quality of our services. We therefore expect our Suppliers to guarantee the same quality standard and systems that reflect appropriate compliance processes and adequate quality audits.

## 11. Compliance with the Supplier Code of Conduct (SCC)

Our Suppliers must comply with the requirements and standards proposed in this Code of Conduct (SCC), and commit to establish measurable objectives in their environmental impacts, due diligence in human rights and compliance with all the aspects contained in this SCC. **TWG** reserves the right to carry out the corresponding self-assessments and/or audits.

The terms and conditions set forth in this SCC reflect **TWG's** values and commitment to our clients and the communities in which we operate. Therefore, any breach of its terms or conditions will entitle **TWG** to terminate the business relationship.

Likewise, our Suppliers must have their own Code of Ethics with an Ethics Whistleblower Channel enabled for reporting an actual or suspected breach of said Code, with proper protections for the whistleblower in order to ensure a safe and confidential environment for compliance.

To report irregularities or non-compliances with this SCC, we have a Whistleblower Channel:  
[cce@tw-group.com](mailto:cce@tw-group.com)

This channel guarantees confidentiality in all cases while adhering to truthfulness and proportionality criteria and ensuring the confidentiality of the whistleblower, as well as the prohibition of reprisals.

This Supplier Code of Conduct was approved at the meeting of the **TWG** Board of Directors held on May 12, 2023.



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