

SUPPLIER CODE OF ETHICS



September 2024



Title of the Standard	Supplier Code of Ethics
Geographical scope	Global
Category	Policy
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Approving body	Board of Directors
Version	V2

PURPOSE

At **Truck and Wheel Group, S.L.** and all its subsidiaries, hereinafter referred to as “**TWG**”, we are committed to conducting 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 adopted by all our suppliers, their workers, employees and their subcontractors.

In our aspiration to be the first choice for our customers, we have established a strict set of ethical standards to guide us in our business practices, with the aim of ensuring that they are in line with the values that distinguish us - which we express in our Code of Ethics - and that contribute to adding value to the communities where we operate, providing an inclusive, respectful and safe work environment, minimising our environmental impact and following transparent, reliable and mutually trustworthy business practices.

This **TWG** Supplier Code of Ethics, hereinafter “**SCE**” is a key component of our ongoing commitment to integrity, trust, honesty, fair dealing and full compliance with all applicable laws and sets out the minimum standards we expect from them. This **SCE** sets out the basic principles that should guide the behaviour of all Suppliers with whom **TWG** has a relationship.

TWG does not condone illegal or unethical behaviour by its suppliers and selects them through a fair procurement process. This **SCE** details the minimum standards required and complements the terms and conditions of Suppliers' purchase contracts with those of **TWG**.

1. Scope of application

This **SCE** applies to all Suppliers who, in the course of their business activity, have a relationship with **TWG** when providing services or goods, regardless of their nationality and the place where the services are provided (hereinafter referred to as the “**Supplier**” or the “**Suppliers**”). In this **SCE** the term Supplier also includes independent contractors and subcontractors who provide goods or services for or on behalf of **TWG**.

2. Commitment to compliance with the law

The Supplier shall comply with all laws applicable to its business at any time, in accordance with the spirit, purpose and letter of such laws. The supplier shall support the United Nations Universal Declaration of Human Rights and the European Convention for the Protection of Human Rights and Fundamental Freedoms. The United Nations Convention against Corruption, as well as the 1998 International Labour Organisation 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 **SCE**, to (i) communicate the principles set out in this **SCE** to their own employees, Suppliers and supply chain; (ii) conduct regular assessments (including third party assessments) of compliance with this **SCE**; (iii) carry out the necessary training actions to ensure that their employees, and their supply chain, read, understand and act in accordance with the contents of this **SCE**; (iv) adopt the necessary policies and procedures to ensure compliance with this **SCE**; and (v) maintain records and corresponding evidence to demonstrate compliance; and (vi) collaborate with **TWG** to assess compliance and take corrective action, if appropriate. Furthermore, if there is any conflict between the **SCE** principles and national laws and regulations, Suppliers must comply with whichever sets the higher standard. In the event that any of the standards in this **SCE** are found to be in conflict with applicable

legal provisions, **TWG** expects affected Suppliers to report this and work with **TWG** to find a solution that complies both with applicable legal provisions and, to the extent possible, with this SCE.

3. Commitment to Human Rights and Labour Practices

TWG's priority is to be committed, binding and firmly respectful in the development of its business activity and in its labour relations with all those with whom it collaborates or carries out commercial activities, regardless of their contractual relationship, nature or dependence and, therefore, it declares its total rejection of:

3.1. Child labour

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

Suppliers shall contribute to the elimination of child labour with the aim that all employees are above the minimum legal working age in the country in which they operate.

3.2. Forced labour and modern slavery

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

Employees of Suppliers should not be required to deposit any money or make any payments related to obtaining employment throughout the recruitment process and for the duration of their employment relationship. Nor may their identity documents be withheld under any circumstances and they must be able to leave employment voluntarily and freely without any threat to themselves or their families. Suppliers shall assess the implementation of work-life balance measures that favour respect for the personal lives of their employees and facilitate the best balance between their personal lives and work responsibilities, in accordance with applicable laws and local practices.

At **TWG** we understand that modern slavery is a violation of fundamental human rights and that it includes, among its various forms, forced labour and human trafficking. This violation violates people's freedom, and its prevention, detection and corresponding reporting are therefore a top priority for our supply chain and must be enforced. In line with this, our Suppliers must address due diligence obligations regarding their own sourcing 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 the terms of applicable collective bargaining agreements regarding working hours, including overtime, rest breaks and paid holidays. Both the terms and conditions of employment, including wages shall be presented to employees in an understandable manner, in the local language and must be legal and reasonable.

3.3. Discrimination and Inequality of Opportunity

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

The Supplier shall promote an inclusive work environment that values the diversity of its employees. Suppliers' policies must also comply with all applicable laws and regulations prohibiting unlawful discrimination in employment decisions relating to hiring, pay and benefits, promotion and access to training.

Respect for people is one of the pillars of our company, so our suppliers are forbidden to carry out any act that could violate or infringe on their dignity.

In accordance with our Commitment to Human Rights and Labour Practices, at **TWG** we promote the due performance of our Suppliers under the following premises:

3.4. Promotion of collective rights and free association

Our Suppliers must recognise and respect the right to associate, join and bargain collectively in accordance with applicable local laws and their employees must be free to join or not join a trade union of their choice, free from threats or intimidation.

3.5. Promoting Health and Safety at Work

Suppliers must provide all employees with a safe and healthy working environment in accordance with applicable laws and regulations. They should also provide specific training in the local language¹ and the provision of appropriate personal protective equipment (PPE), so as to minimise the health and safety risks associated with their respective roles. The facilities, therefore, must remain clean and have drinking water. It is mandatory to protect third parties and prevent work-related accidents, injuries and illnesses in the areas where they carry out their activities.

4. Environmental Protection

Our Suppliers shall 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 minimise their impact on the environment, while maintaining commitments to quality and in a sustainable manner.

Processes and policies shall be in place to actively improve the efficient use of raw materials, energy and water in order to minimise greenhouse gas (GHG) emissions, properly dispose of waste, provide ongoing training for employees on proper environmental protection, and report to us on their continuous improvement initiatives and actions aimed at responsible and sustainable management.

Suppliers shall act transparently and have adequate reporting mechanisms in place in relation to the performance of the above mentioned aspects in case they are requested to provide information under this SCE.

5. Anti-corruption and anti-bribery

At **TWG** we do not tolerate, allow or get involved in any kind of corruption, in any of its manifestations in the performance of our business activities, neither in the public nor in the private sector, so we promote a preventive culture with absolute priority over the eventual obtaining of any kind of economic or other kind of benefit. To this end, we have specific risk assessment procedures and relevant controls in place to ensure

¹ or in the language understood by the worker

ethical and responsible behaviour, as well as training for our own employees. Suppliers shall not, directly or indirectly, promise, offer or pay any bribe to facilitate transactions or other improper payments to any third party or **TWG** Professional in connection with their contracts with them. Suppliers shall not corruptly promise, offer or pay, directly or indirectly, money and other valuable goods, in order to: (i) influence an act or decision of a third party or a **TWG** professional; (ii) obtain an undue or improper advantage for **TWG**; or (iii) induce a third party or a professional to influence the act or decision of a public official and other persons involved in the exercise of public functions.

Suppliers shall not promise, offer or give gifts or objects of value, of any nature whatsoever, to persons or entities who are public officials or who are involved in the exercise of public functions on the occasion of or in connection with the execution of their contracts with **TWG** companies.

Therefore, our Suppliers must comply with the same commitment and have policies and procedures for the prevention and detection of these behaviours, and maintain appropriate training for their employees in order to guarantee the standards that **TWG** promotes.

6. Preventing money laundering and terrorist financing

At **TWG** we ensure, through internal procedures, that the business activities we manage in all the territories where we operate are from lawful activities and in line with this, our Suppliers must act diligently, in an environment of legality and transparency. This means, among other procedures, maintaining financial records that reflect transactions accurately, honestly and in a timely manner and employing due diligence processes.

7. Conflicts of interest

At **TWG** we understand that conflict of interest undermines independence and objectivity and therefore interferes with the ability to fulfil contractual duties and obligations in an objective manner. We therefore expect our Suppliers to (i) implement an appropriate Policy in this regard that effectively covers professional conflicts and/or conflicts 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 objectivity or loyalty to **TWG**.

8. Market and Competition

At **TWG** we are committed to competing fairly in the markets and not to engaging in misleading or derogatory advertising towards our competitors or third parties, and we abide by free competition laws in all the places wherever we operate. We expect this same commitment from our Suppliers in their definition and commercial conduct at all levels, to prevent abusive practices, whether through the exchange of confidential information with their competitors or actions that serve to restrict free market competition. Our Suppliers shall comply with applicable competition and antitrust laws.

In addition, our Suppliers must not engage in or facilitate business activities with entities or individuals that violate legal requirements for international trade and commerce and must comply with all applicable export control, sanctions and customs laws and regulations. They must also apply our same ethical standards to their own supply chains as part of fulfilling their contractual obligations.

9. Confidentiality of Information and Professional Loyalty

In line with the above precept, at **TWG** we consider it key to protect the confidentiality, integrity and availability of information and therefore our Suppliers must safeguard and make appropriate use of confidential information and shall comply with applicable data protection laws, including and in particular the security of personal data of clients, consumers and employees during its collection, recording and processing, i.e. in all information life cycles. It is the responsibility of the suppliers and their respective professionals to adopt sufficient security measures to protect the non-public information owned by **TWG** and to have the necessary means to safeguard it.

10. Quality

As a fundamental pillar, **TWG** is committed to achieving the highest levels of customer satisfaction and to this end we strictly observe and respect all applicable regulations, guidelines, standards, policies and criteria to ensure the highest quality of our services. We therefore expect our Suppliers to guarantee the same quality standards and systems that reflect appropriate compliance processes and adequate quality audits.

11. Compliance with the Supplier Code of Ethics (SCE)

TWG Suppliers will receive a complete copy of this Code of Ethics, which they will sign and acknowledge receipt of, and must comply with the requirements and standards proposed in this Code of Ethics (SCE), committing to establish measurable targets for their environmental impacts, human rights due diligence and compliance with all aspects included in this SCE. **TWG** reserves the right to conduct appropriate self-assessments and/or audits.

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

Likewise, our Suppliers must have their own Code of Ethics with their own whistleblowing channel enabled for reporting or suspected non-compliance with it, with due protection for the whistleblower, ensuring a safe and confidential environment for compliance.

To report irregularities or non-compliance with this SCE, we have an appropriate whistleblowing channel: cce@tw-group.com

This channel guarantees confidentiality in all cases in accordance with criteria of truthfulness and proportionality and guarantees the confidentiality of the complainant and the confidentiality of his/her identity, as well as the prohibition of reprisals.

This Supplier Code of Ethics was approved at the **TWG** Board of Directors' meeting held on 12 May 2023 and last amended on 30 September 2024, this being its 2nd amendment. **Version**

Version history

Version	Date	Created by	Validated by	Approved by	Description
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02	30 September 2024	Debora Villecco	Regulatory Compliance Committee	Board of Directors	Revision

TWG Regulatory Compliance Committee

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