



CODE OF CONDUCT

FOR SUPPLIERS AND ENTITIES

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V1 - Feb. 2024

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Statement of Acknowledgment and Compliance with the Code of Conduct

Code of Conduct for suppliers and entities signing agreements with usa group

This Code of Conduct establishes the fundamental expectations and requirements that USA Group expects from all its suppliers and entities signing agreements in terms of ethical behavior, compliance with laws and regulations, and social responsibility. Suppliers and entities must ensure that this Code is followed not only by themselves but also by their employees, subcontractors, and third parties acting on their behalf.

Below, the fundamental principles and current legislation on which this Code is based will be presented, along with a series of best practice recommendations to ensure its proper application and compliance.

**If you are unable to comply with any
point of the applicable legislation,
please let us know.**

Human Rights and Labor Standards

USA Group requires its suppliers to respect human rights and labor standards, ensuring the implementation of ethical practices throughout their value chain.

Applicable legislation:

The following are the key applicable legal frameworks:

- ✓ **Organic Law 3/2007, of March 22, on Effective Equality between Women and Men:** Prohibits workplace discrimination based on gender and mandates equal opportunities and treatment in the workplace.
- ✓ **International Labour Organization (ILO) Conventions:** Particularly the Minimum Age Convention (Convention 138) and the Forced Labour Abolition Convention (Convention 29), which establish minimum labor rights and prohibit child and forced labor.
- ✓ **Law 31/1995, of November 8, on Occupational Risk Prevention:** Requires companies to provide a safe and healthy working environment, regulating workplace health protection measures.
- ✓ **Universal Declaration of Human Rights (UDHR) of the United Nations:** The UDHR establishes universal rights such as equality, freedom, security, and human dignity, which all businesses and suppliers must respect.
- ✓ **United Nations Global Compact Principles:** The UN Global Compact focuses on 10 fundamental principles in four key areas: Human Rights, Labor Standards, Environment, and Anti-Corruption.
- ✓ **State-wide Collective Bargaining Agreement for the Metal Industry (CEM), Provincial and Autonomous Collective Agreements, and Training and Professional Development Agreements:** These sector-specific agreements regulate labor conditions for workers in the metal industry.

Human Rights and Labor Standards

Best Practice Recommendations

No child labor

Ensure the absence of any form of child labor, complying with international and national laws on the minimum working age

Free choice of employment

Do not tolerate any form of slavery, forced labor, or human trafficking. Employees must have the freedom to decide on their employment

Working hours


Comply with legal standards regarding working hours, breaks, and compensation.

Fair wages

Ensure that employees receive fair wages that comply with applicable legislation and any collective agreements.


Diversity and inclusion

Foster an inclusive and respectful work environment that promotes equal opportunities for all individuals



Freedom of association

Respect employees' rights to join trade unions and engage in collective bargaining



Fair treatment and non-discrimination

Ensure a workplace free from discrimination based on race, gender, sexual orientation, disability, religion, social origin, or any other protected condition.

Health and Safety

Suppliers must provide a safe and healthy work environment for their employees.

Applicable legislation:

The following are the key applicable legal frameworks:


- ✓ **Law 31/1995, of November 8, on Occupational Risk Prevention:** Requires companies to provide a safe and healthy work environment, regulating workplace health protection measures.
- ✓ **Royal Decree 39/1997, of January 17, approving the Regulation of Prevention Services (Spain):** Complements the Occupational Risk Prevention Law and regulates the conditions for the establishment of prevention services in companies, as well as risk assessment and control in workplaces.
- ✓ **international Labour Organization (ILO) Conventions:** Particularly the **Occupational Safety and Health Convention (Convention 155)** and the **Convention on Occupational Health Services (Convention 161)**, ensuring employees have access to adequate medical services to prevent occupational diseases. **The ILO Recommendation 164** provides more specific guidelines on workplace health and safety policies.
- ✓ **REACH (Regulation (EC) No. 1907/2006):** Regulates the use of chemical substances to protect human health and the environment.
- ✓ **United Nations Global Compact Principles:** The UN Global Compact focuses on 10 fundamental principles in four key areas: Human Rights, Labor Standards, Environment, and Anti-Corruption.

Health and Safety

Best Practice Recommendations


Compliance with legislation

Comply with all applicable occupational health and safety laws and regulations



Risk prevention

Adopt practices that minimize occupational risks, provide necessary protective equipment, and promote a culture of safety at all levels of the organization



Preventive and emergency measures

Suppliers must identify and assess potential emergency situations and minimize their impact through contingency plans

Environmental Responsibility

These regulations ensure that companies comply with international environmental standards and adopt sustainability practices to minimize their environmental impact

Applicable legislation

The following are the key applicable legal frameworks:

- ✓ **Law 7/2022, of April 8, on Waste and Contaminated Soil for a Circular Economy:** Establishes guidelines for the proper management and treatment of hazardous waste, promoting environmental sustainability throughout the supply chain.
- ✓ **Law 26/2007, of October 23, on Environmental Responsibility:** Holds companies accountable for preventing and repairing environmental damage caused by their operations, with a focus on minimizing impact and implementing sustainable practices.
- ✓ **Industrial Emissions Directive (Directive 2010/75/EU):** Requires companies to minimize pollutant emissions to reduce their environmental impact.
- ✓ **REACH (Regulation (EC) No. 1907/2006):** Regulates the use of chemical substances to protect human health and the environment.
- ✓ **United Nations Global Compact Principles:** The UN Global Compact focuses on 10 fundamental principles in four key areas: Human Rights, Labor Standards, Environment, and Anti-Corruption.

Environmental Responsibility

Best Practice Recommendations

Compliance with environmental laws

Comply with all applicable local and international environmental laws and regulations.

Efficient use of resources

Protect biodiversity and minimize the environmental impact of operations through proper waste management, efficient use of resources, reduction of pollutant emissions, and promotion of recycling..

ISO 14001

Suppliers must adhere to ISO 14001 standards and promote sustainable policies that optimize the use of natural resources, energy, and water

Air and water quality protection

Ensure the protection of air and water quality in all operations by properly managing chemicals and other hazardous materials

Emission reduction

Suppliers must implement strategies to reduce greenhouse gas (GHG) emissions, promote energy efficiency, and encourage the use of renewable energy sources

Ethics and Transparency

It is essential to promote responsible, transparent, and respectful behavior both within the organization and in relationships with suppliers, customers, and the community. This ensures ethical management that not only drives business success but also creates a positive impact on society and the environment

Applicable legislation

The following are the key applicable legal frameworks:

- ✓ **Law 10/2010, of April 28, on the Prevention of Money Laundering and Terrorist Financing:** Requires companies to implement policies and procedures to prevent money laundering and illegal financing.
- ✓ **Organic Law 1/2015, of March 30, Reform of the Criminal Code:** Introduces corporate criminal liability, including measures against corruption, fraud, and bribery within business practices.
- ✓ **General Data Protection Regulation (EU) 2016/679 (GDPR):** Regulates the protection of personal data, applicable to all entities handling information from suppliers, customers, and employees.
- ✓ **Law 19/2013, of December 9, on Transparency, Access to Public Information, and Good Governance:** Applies to suppliers that have relationships with public entities and establishes transparency principles, requiring the publication of contract and agreement information.
- ✓ **Law 31/2014, of December 3, amending the Capital Companies Act to improve corporate governance:** Establishes obligations regarding good corporate governance and transparency for companies and corporations, with a focus on ethical and regulatory compliance.
- ✓ **United Nations Global Compact Principles:** The UN Global Compact focuses on 10 fundamental principles in four key areas: Human Rights, Labor Standards, Environment, and Anti-Corruption.

Ethics and Transparency

Best Practice Recommendations

Corruption and bribery

Suppliers must not engage in corrupt practices, bribery, or any form of illegal conduct. This includes the prohibition of offering, giving, requesting, or accepting anything of value to gain unfair business advantages.

Conflict of interest

Suppliers must avoid situations that could create a conflict between their interests and those of USA Group. Any potential conflict of interest must be disclosed and managed transparently.

Fair competition

Suppliers must act with integrity, respect competition laws, and refrain from engaging in anti-competitive practices

Conflict minerals

Suppliers must ensure that the products supplied do not contain conflict minerals, in accordance with international regulations.

Prevention of counterfeit products

Suppliers must take necessary measures to prevent the manufacturing and distribution of counterfeit products.

Protection of Information

Suppliers must protect USA Group's confidential and commercial information and must not disclose it without prior authorization. They must also comply with data protection laws, ensuring the security of personal and business information. Additionally, they must respect and protect intellectual property rights, both those of USA Group and those of third parties.

Audits and Compliance

USA Group reserves the right to conduct periodic audits of suppliers to verify compliance with this Code of Conduct. Suppliers must fully cooperate in these audits and provide access to the required information.

Whistleblowing Channels and Protection Against Retaliation

Suppliers must establish secure channels for reporting irregularities, ensuring whistleblowers are protected against any form of retaliation. Suppliers are expected to promote a culture of transparency and ethics in all their operations.

Continuous Improvement

Suppliers are encouraged to work on continuously improving their practices, ensuring compliance with the expectations outlined in this Code and adopting additional measures to promote sustainability, ethics, and social responsibility in their operations

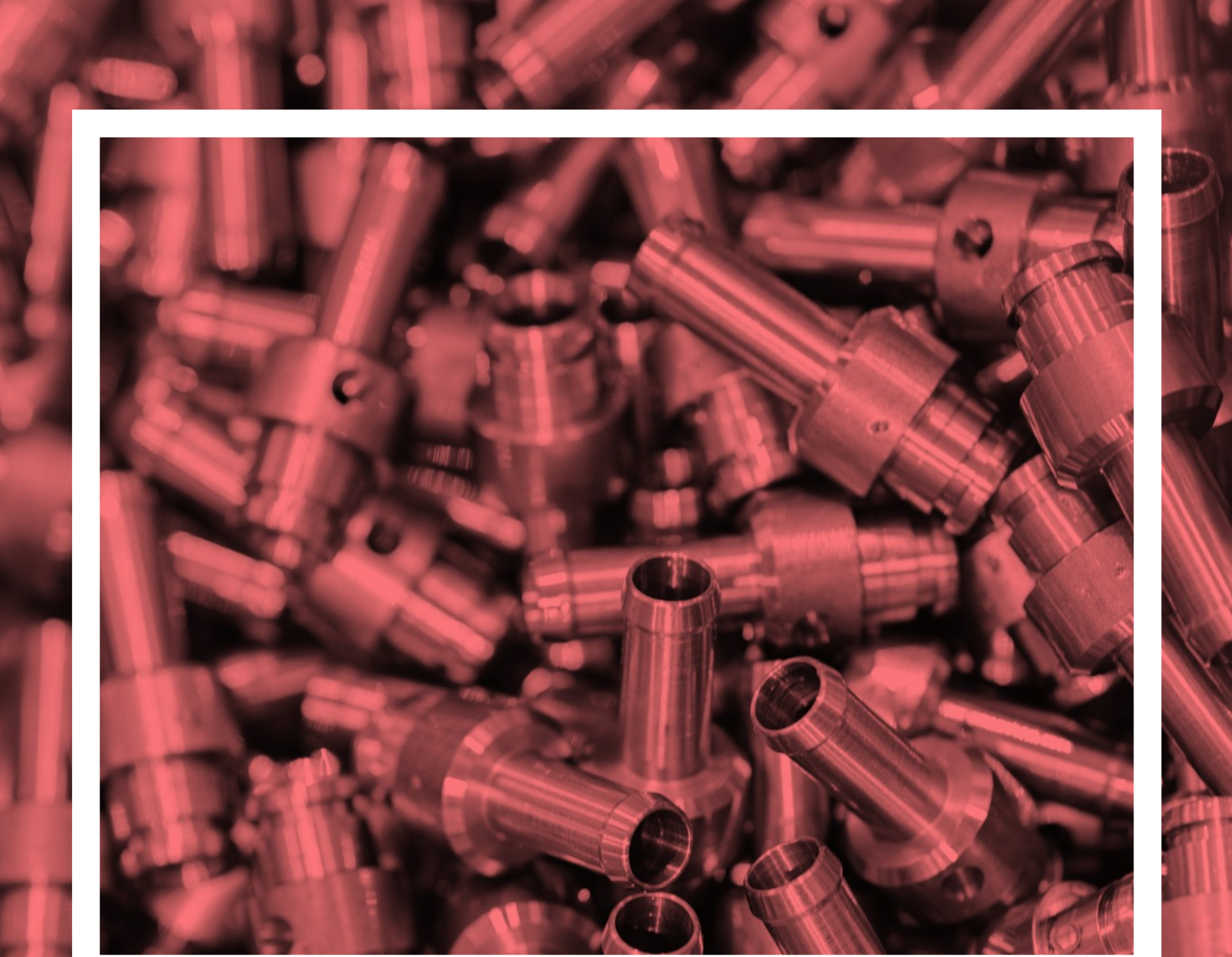
Consequences of Non-Compliance

Failure to comply with this Code of Conduct may result in the termination of the business relationship with USA Group, in addition to any other legal or contractual actions that may be applicable.

This document shall remain in force until a new update is approved or it is repealed.

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Statement of Acknowledgment and Compliance with the Code of Conduct

Supplier Name.....

Full Name.....

ID N°..... Position.

The undersigned is authorized to represent the Supplier and acknowledges and accepts, on behalf of the Supplier, compliance with and adherence to the standards, principles, and requirements of this Code. The Supplier will ensure that its affiliated companies and their respective employees, officers, directors, agents, and other individuals contracted by the Supplier or any of its affiliates are aware of and comply with the principles and standards of this Code.

The undersigned has also been informed that personal data will be protected and included in a database subject to the guarantees of the General Data Protection Regulation (GDPR), which came into effect on May 25, 2018, replacing Organic Law 15/1999, of December 13, concerning the protection of individuals regarding the processing of personal data.

Signature:

Location:, Date:

Failure to read the Code of Conduct or the supporting policies, or failure to sign the Statement of Acknowledgment and Compliance, does not justify ignorance or violation of its contents.