

# **CODE OF ETHICS FOR SUPPLIERS**

## Authorizations and version control

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Version	Approval Date	Brief description of the change
1.0	01/25/2018	Implementation
2.0	06/25/2025	Update of various sections Addition of a new "Notification" section to include links to the Ethics Channel.

# TABLE OF CONTENTS

1. PURPOSE AND SCOPE .....	5
2. OUR ETHICAL VALUES .....	6
3. CODE OF CONDUCT .....	7
4. REPORTING INCIDENTS AND IRREGULARITIES .....	11
5. COMPLIANCE AND SUPERVISION .....	12

# GLOBALIA GROUP COMPANIES



The Globalia Code of Ethics sets forth in its purpose and scope of application the need to extend to our suppliers, partners, and contractors a framework of ethical conduct that guides the relationships between both parties.

## 1. PURPOSE AND SCOPE

This Supplier Code of Ethics has been developed to establish a framework of trust and collaboration between Globalia and its suppliers, contractors, and partners, with the aim of strengthening business relationships based on the principles set forth in Globalia's Code of Ethics, which underpin the way we conduct our procurement and contracting processes.

Globalia expects its suppliers, contractors, and partners to go beyond strict compliance with current legislation and commit to upholding the ethical values set forth in this 'Supplier Code of Ethics'.

In turn, Globalia trusts that these suppliers will ensure their own suppliers adhere to values similar to those set forth herein.

## 2. OUR ETHICAL VALUES

- **Normality:** At Globalia, we act with normality and work to achieve the goals demanded by a modern society.
- **Honesty:** We act with honesty, sincerity, and consistency.
- **Adaptability:** Our daily work is based on understanding what society demands—not only what it needs, but also how it needs it—and responding with the necessary resources.
- **Teamwork and Professionalism:** The backbone of our group and our greatest asset is our staff. We foster teamwork, employee effort, equal opportunities, and training so that our staff can reach their full potential.
- **Integrity:** We stand firm in the commitments we have made and in upholding our principles.
- **Leadership:** Through ethics and values, companies become stronger, and our goal is to maintain, reinforce, and improve our leadership every day.

### 3. CODE OF CONDUCT

Globalia's suppliers, contractors, and partners shall conduct their business and professional activities by always acting with ethics and integrity, taking into account the following standards of conduct:

Preventing fraud, bribery, and corruption: Suppliers, partners, and contractors shall comply with the laws, rules, and regulations of the countries where they operate and shall provide accurate information in any financial, business, or commercial publications they issue.

Furthermore, to maintain and ensure their independence, they must identify and resolve any actual or potential conflict of interest involving any of their employees. They must categorically reject corruption in all its forms, as well as extortion and bribery. No supplier may offer or make, directly or indirectly, payments through any means—including payment in kind or any other form of benefit—to any individual or legal entity for the purpose of:

- Illegally obtain business or a competitive advantage.
- Enable the individual or legal entity to use or abuse their influence to unlawfully obtain any business or competitive advantage.

Suppliers and third parties are informed of the existence of Globalia's Gifts and Invitations Policy. This Policy establishes that the acceptance of gifts from third parties is permitted provided that such a gift has been given voluntarily by the third party and does not, under any circumstances, imply that accepting it will influence the third party's decision-making capacity in any way. It is noted that giving any gift in the form of cash, gift cards, checks, or lottery tickets is prohibited. Exceptions are made for invitations to social and group events where the recipient is acting in a representative capacity for the group's companies.

**Occupational Health and Safety:** Suppliers must ensure a safe environment that prevents any risk to the health and physical well-being of their workers and complies with all occupational health and safety regulations, as well as any applicable sector-specific regulations. Suppliers shall respect human rights by rejecting child labor and forced labor, as well as any form of exploitation or taking advantage of situations of need or vulnerability.

**Prevention of Workplace Harassment:** Suppliers shall reject and not permit any manifestation of violence, exploitation, or sexual, physical, psychological, or moral harassment, abuse of authority, or mistreatment.

**Information handling, transparency, and confidentiality:** All non-public information belonging to Globalia that is owned by or in the custody of the supplier must be treated as confidential, restricted, and/or for internal use only, and it is the supplier's responsibility to take appropriate measures to protect such information. The supplier must comply with personal data protection requirements, specifically Regulation (EU) 2016 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation).

**Fair Competition:** Suppliers shall uphold fair competition and respect for the market and consumers. In addition to complying with applicable regulations, they must conduct their business ethically in relation to their competitors.



During the performance of the Contract, the supplier shall safeguard Globalia's interests, ensuring that no situation arises that could give rise to conflicts of interest in relation to the activities to be carried out, and must therefore take all measures within its power to detect such conflicts, immediately notifying Globalia in writing (through its Ethics Channel) of any situation that could give rise to them, and collaborating with Globalia as appropriate, complying with the instructions provided by Globalia, following consultation and evaluation of the circumstances, with the in order to avoid the aforementioned conflicts.



By signing the Contract, the individual supplier declares:

1. That they do not hold, within Globalia, any senior management positions (director, senior manager with strategic responsibilities), nor are they an employee of the Organization or an auditor of Globalia's accounts;
2. That they do not have, within Globalia, family members/relatives up to the second degree/a spouse who is not legally separated/a cohabiting partner/a spouse or children of their partner/who are related to them by blood or marriage;
3. That neither he nor his respective family members (spouse not legally separated or first-degree relatives) have held, in the last 24 months, positions in the Public Administration or in entities responsible for public services that have had a direct relationship with activities carried out by Globalia.

The supplier, as a legal entity, hereby declares upon signing the Contract that, based on its knowledge of its corporate structure, no person belonging to its governing, management, or supervisory bodies:

1. Is a member of Senior Management or the Governing Bodies, nor an executive with key responsibilities at Globalia, nor is a relative up to the second degree, spouse, partner, child of a spouse or partner, or a dependent (by kinship or marriage) of the aforementioned members.
2. Is an employee of Globalia, nor is a relative up to the second degree, spouse, partner, child of a spouse or partner, or dependent (by blood or marriage) of the aforementioned employee.
3. Neither the individual nor their immediate family members (spouse (not separated) or first-degree relatives) have held, or currently hold, within the last 24 months, positions in the Public Administration or in entities responsible for public services that have had a direct relationship with activities carried out by Globalia (granting of concessions, oversight activities, etc.).

The supplier undertakes to notify Globalia of any changes that may occur subsequently and while the supplier remains active, regarding the information declared prior to the signing of the Contract.

## 4. REPORTING INCIDENTS AND IRREGULARITIES

Suppliers may report any incident or irregularity related to this Code and its management through the corporate website in the Ethics Channel section, using the following links:

**Globalia:** <https://globalia.canaletico.es/>

**Aviation Division:** <https://aireuropa.canaletico.es/>

Such reports are guaranteed to be confidential. Furthermore, in the event that a Globalia employee requests a gift or invitation from a supplier, whether for the employee's personal use or for the benefit of Globalia, the supplier must report this incident to Globalia through the Globalia or Air Europa Ethics Channel.



## 5. COMPLIANCE AND MONITORING

This Code of Ethics must be accepted by all suppliers, contractors, and partners in order to enter into a commercial agreement with Globalia and will be included as an annex to the relevant contracts. Each and every supplier must authorize Globalia to monitor proper compliance with this Code and, to that end, shall provide the means and access to the facilities and documentation necessary to carry out such monitoring and compliance checks.

