



Guide to conduct expected in suppliers of AIMEN

Ref. compliance policies

**COMPLIANCE
COMMITTEE**

*This guide has been approved by the Executive
Committee of AIMEN on 6 July 2022.*

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GUIDE TO EXPECTED BEHAVIOUR OF AIMEN TECHNOLOGY CENTRE SUPPLIERS

The Asociación de Investigación Metalúrgica del Noroeste (AIMEN) is a private non-profit organisation, constituted in Vigo in 1967, and is currently a Technological Centre of national and international reference.

Due to its history and in the conviction of consolidating an ethical business culture as a framework for its activity, the Technology Centre has implemented a Criminal Compliance Management System whose maximum expression is the Code of Ethics it has adopted, as well as the Compliance Policy that serves as a framework for its development, integrating it together with the Quality, Environmental and Occupational Health and Safety Systems, in an interrelated whole to ensure compliance with regulations based on ethical behaviour and socially sustainable activity.

Therefore, achieving these objectives requires constant and transparent interaction with its stakeholders and, among them, the members of its supply chain, expecting them to implement the same culture of ethical and regulatory compliance.

In coherence with the above, the Technology Centre has adopted this Supplier Conduct Guide, summarising the conduct expected of its suppliers, aligning them with the values and principles of compliance set out in our Code of Ethics.

This is a document summarising the ethical and cultural values, way of acting, principles and, ultimately, the way of being, expected of its suppliers and which, together with the Code of Ethics and internal Compliance Policies (anti-bribery and anti-corruption policies, equality and anti-harassment, etc.), constitute a body of regulations that must be complied with.

SCOPE OF APPLICATION:

This document is extended to all members of the AIMEN Technological Centre as well as to all its suppliers, who will be asked to accept and respect this document on the occasion of the contractual relations maintained with them.

Thus, in any new commercial relationship, knowledge of this Guide and the commitment to comply with it will be a necessary requirement for the maintenance of the contractual relationship, with AIMEN reserving the right to terminate it in the event of serious non-compliance.

Therefore, the AIMEN supplier is committed to promoting and complying with the values contained in the AIMEN Code of Ethics, and thus in relation to,

HUMAN RIGHTS:

AIMEN's supplier shall comply with and promote respect for Human Rights, as set out in international declarations, with particular reference to the United Nations Universal Declaration of Human Rights and those at European level.

As a consequence, the supplier undertakes not to tolerate any discrimination on grounds of sex, ideology, religion or race.

Refuse to employ or allow its suppliers to employ child labour or engage in exploitative, abusive or slavery-like practices.

WORKING CONDITIONS, OCCUPATIONAL HEALTH AND SAFETY AND SOCIAL SECURITY:

AIMEN's supplier shall comply with all labour and social security obligations incumbent upon it in accordance with the legislation in force in all jurisdictions in which it operates.

Accordingly, the AIMEN supplier:

- Promote a work climate based on respect, a safe working environment, and prevention of occupational health and safety risks for its employees and collaborators.
- It shall guarantee, in general and without discrimination of any kind, compliance with the minimum regulatory conditions for the reconciliation of the working and personal lives of its workers, promoting their improvement as far as possible.
- It shall guarantee the freedom of collective association of its employees without discrimination of any kind.
- It will ensure compliance with current regulations on equal opportunities between men and women, guaranteeing as a minimum, the fundamental rights of men and women and the equality inherent in them in the case of action in jurisdictions where Western standards in this area are not fully developed.
- Promote a working environment where there is no room for violence, physical, sexual, psychological, moral or any other kind of harassment, abuse of authority at work or any other conduct that creates an intimidating or offensive environment for the personal rights of workers. It shall also reject any discrimination based on gender, race, colour, creed, religion, age, nationality, marital status, social class, political opinion, sexual orientation or disability.
- It shall ensure compliance with the Social Security and Occupational Health and Safety obligations imposed by current legislation.

ENVIRONMENT:

AIMEN maintains an Environmental Management System based on the highest international standards, through strict observance and compliance with the ISO Standards (ISO 14001) that the Association has implemented, and for which it has the accredited Certification of its implementation in accordance with the Standard.

Social sensitivity in this matter is evident and is increasing every day due to the strong awareness campaigns and the use of social networks as a complaint system. It is clear that the economic system and the commercial and industrial activity itself requires a policy of environmental sustainability. For this reason, the AIMEN supplier:

- It should promote environmentally friendly behaviour in its activities.
- Manage your waste in strict compliance with current regulations.
- To raise awareness among all its members about environmentally friendly behaviour, recycling and sustainability.
- Promote the implementation of environmental management processes, guidelines and policies that encourage the sustainable and responsible use of natural resources.
- Protection of biodiversity, minimising negative impacts on natural ecosystems for the benefit of the conservation of natural wealth.
- Promote the development of initiatives that promote: Recycle, Reduce, Reuse, Recover, Repair (the five Rs).

CONFIDENTIALITY, PRIVACY AND INTIMACY:

Confidentiality: The establishment and respect of good practices in terms of confidentiality is a fundamental premise in AIMEN's daily activity, closely related to respect for the intellectual and industrial property rights of our clients, suppliers and business partners. For this reason, the AIMEN supplier:

- They must make legitimate use of the confidential information to which, in their relationship with AIMEN, they may have access, refraining from disclosing it to third parties, unless authorised, and in any case respecting the confidentiality clauses or confidentiality contracts (NDA) signed with AIMEN and with third parties.

Privacy and intimacy: Privacy and intimacy is a fundamental right of all people, and AIMEN makes every effort to safeguard it. Therefore, the supplier of AIMEN:

- It must scrupulously respect personal data protection regulations, not tolerating any kind of action that violates them.
- Consequently, it must scrupulously comply with the provisions of the RGPD 679/2016 and the LOPDGDD 3/2018, especially with regard to the exercise of the rights of data subjects, safeguarding of information, and action in situations of security breaches, signing, if applicable, the relevant contractual clauses and the contracts of the party responsible, co-responsible or in charge of the processing of personal data that include it.
- If obliged to do so, it must appoint and maintain a Data Protection Officer.

INTELLECTUAL AND INDUSTRIAL PROPERTY:

AIMEN repudiates any illegitimate use of intellectual or industrial property and requires it, in accordance with current legislation and its own Compliance Policy, from any supplier. For this reason, the supplier of AIMEN:

- It shall refuse any collaboration or activity related to industrial or corporate espionage.
- Respect the property of others, whether legally or contractually protected, limiting their actions to those licences or authorisations for use that have been legitimately acquired.
- Respect the rights of the owners, proprietors, authors or any other interested party, in accordance with the provisions of current legislation and in particular the laws on Intellectual and Industrial Property, Trademarks and similar.

REJECTION OF ANY FORM OF CORRUPTION OR FRAUD:

AIMEN's commitment to the absolute rejection of crime leads it to maintain and demand, internally and externally, preventive and reactive conduct in the face of corrupt actions or proposals, both in its relations with private entities and with Public Administrations and their civil servants. Therefore, the supplier of AIMEN:

- Reject any action that could constitute, support, incite or justify corruption (with officials or privately), fraud, bribery or money laundering.
- Refrain from committing unlawful acts or acts related to corruption, fraud, bribery, money laundering or terrorist financing. In particular, to refrain from such conduct, directly or indirectly related to or covered by the maintenance of business relations with AIMEN.
- Refrain from engaging in business relations with third parties engaged in activities such as those referred to in the previous point.
- Refrain from offering, giving, requesting or receiving gifts, gifts or any advantages from or to AIMEN and its staff, and in particular, with the aim of obtaining advantages in the contracting or signing of a contract.
- Prevent and refrain from conduct contrary to national and international laws governing free competition in the marketplace
- Comply with the contractual obligations acquired with AIMEN, avoiding any action that constitutes fraud or corruption in order to avoid it.
- Establish and maintain special care in dealing with possible conflicts of interest, refraining from intervention, unless waived, when undesirable situations arise as a result of such conflicts of interest.
- To inform AIMEN of the existence of unacceptable behaviour, such as that described above, in the course of the business relationship maintained.

COMPLIANCE WITH FISCAL AND TAX OBLIGATIONS. SUBSIDIES AND PUBLIC FUNDS

AIMEN's Code of Ethics states that financial management shall be transparent, based on reliable and complete information, never altered or manipulated, and in all cases complying with tax and social security regulations.

Special care is required in the control and use of public funds obtained in grants and subsidies, whether direct or related to the many projects in which AIMEN participates as a leader, consortium member, partner or subcontractor. The procedures and controls referring to the suitability and legality of applications for funding, control of expenditure,

The use of funds and their justification in relation to the obligations acquired is an essential and inalienable element.

Respect for the above principles will mark the systems for choosing business partners, from whom conduct respectful of legal obligations will be required, as well as ethical and transparent conduct. Therefore, the supplier of AIMEN:

- It shall respect the same principles as those set out in the AIMEN Code of Ethics.
- It will scrupulously respect the fulfilment of its fiscal and social security obligations, with special care in the treatment of the contractual relations that it formalises and maintains with AIMEN.
- It will scrupulously respect the regulations governing public subsidies and the use of public funds obtained, the obligation of justification and control.
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REACTION TO NON-COMPLIANCE

AIMEN WILL REACT TO ANY DEFAULT and, in particular, to any commission of or collaboration in the commission of offences

We will always apply a policy of no tolerance for any kind of risk of non-compliance with the ethical values of the Association. Any situation or proposal (whether internal or external to the organisation) that could compromise the principles set out in this document must be rejected.

We will encourage the commitment and adaptation of the conduct of the members of the Association and its business partners to comply with the law, applying, in accordance with the regulations in force and the contractual clauses provided for, the relevant system of sanctions, which will be governed in all cases by the principle of proportionality.

Correspondingly, behaviour that promotes or ensures the culture of ethical compliance desired by AIMEN will be recognised and valued.

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