



SUPPLIER CODE OF CONDUCT

The following English translation is provided by the Company for information purposes only, based on the original and official document in Spanish available on the Company's website. In the event of any discrepancy between the English version and the Spanish original document, the latter will prevail.

INDEX

1.	INTRODUCTION	4
2.	OBJECT	4
3.	SCOPE	4
4.	COMPLIANCE WITH THE GENERAL PRINCIPLES OF THE CODE OF CONDUCT	4
4.1.	Human Rights, International Sanctions and Export Control	4
4.1.1.	Respect for Human Rights	4
4.1.2.	International sanctions and export control.....	5
4.2.	Respect and protection of people	5
4.2.1.	Occupational Health and Safety at work.....	5
4.2.2.	Working Conditions	5
4.2.3.	Equal treatment.....	5
4.3.	Environment	5
4.4.	Anti-corruption and prevention of bribery, gifts and hospitality policy, donations, sponsorships, and conflicts of interest.....	6
4.5.	Responsible acquisition of raw materials	6
4.6.	Protection of intellectual and industrial property.....	7
4.7.	Cybersecurity, protection of personal data and privacy	7
5.	INFORMATION SYSTEM (WHISTLEBLOWING CHANNELS)	7
5.1.	Internal information system of CAF	7
5.2.	Supplier complaint channel requirements	8
6.	RESPONSIBILITIES	8

1. INTRODUCTION

The Code of Conduct of the CAF Group (hereinafter “CAF”) (available on the corporate website www.cafmobility.com) reflects a responsible declaration at the highest level and a guarantee of leadership and commitment to ethics, sustainability and good governance of CAF, the objective being to consolidate a responsible business model that ensures the creation of sustainable economic value in the long term, aligning the interests of the different interest groups.

The suppliers that make up CAF's different supply chains are highly relevant agents in terms of achieving the objectives and developing CAF policies and strategies. In this sense, CAF strives to establish links and collaborations that are beneficial for all parties involved in its supply chains.

CAF adopts a proactive approach to due diligence throughout its entire global value chain on an ongoing basis, which is why it articulates the appropriate action frameworks, procedures, and processes to monitor and mitigate its potential negative impacts in terms of Compliance.

2. OBJECT

This Supplier Code of Conduct establishes the minimum expectations of conduct that CAF 's suppliers must meet, so that the requirements, recommendations, and approaches made throughout its different sections constitute the basis for the establishment and development of solid and beneficial business relationships for all parties.

3. SCOPE

The Supplier Code of Conduct is valid in the global scope setting a homogeneous ethical standard, in everything that is not incompatible with the local regulations of application and applies to suppliers throughout the different supply chains related to CAF products and services. Therefore, the requirement is established for suppliers to transfer the requirements and guidelines included in this Supplier Code of Conduct throughout their respective supply chains.

This Supplier Code of Conduct must be interpreted without prejudice to any additional requirements that may be established legally or contractually and that affect the commercial relationship between CAF and its suppliers.

4. COMPLIANCE WITH THE GENERAL PRINCIPLES OF THE CODE OF CONDUCT

All suppliers must maintain strict compliance with the general principles of the Code of Conduct (“**General Principles of the Code of Conduct**”), which are imperative norms of conduct and ethical standards. These principles are specified in scrupulous respect for the laws, Human Rights, public freedoms and Fundamental Rights, the principles of equal treatment and non-discrimination, protection against child labour exploitation and any other principles included, at least, in the following instruments and their corresponding present and future developments:

- International Bill of Human Rights (made up of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights).
- Guiding Principles on Business and Human Rights published by the United Nations.
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD 2023).
- Declaration of the International Labor Organization (ILO) on Fundamental Principles and Rights at Work and their Follow-up, and
- United Nations Global Compact on Human Rights, labour rights, environmental rights and the fight against corruption.

Suppliers are required to uphold and cascade the outlined General Principles throughout their supply chain.

4.1. Human Rights, International Sanctions and Export Control

4.1.1. Respect for Human Rights

Respect for Human Rights is one of the principles on which CAF's activities are based, generally and invariably in all the countries in which it operates and in all the companies that are part of the Group. In this sense, CAF shows a firm commitment to the principles further developed in the Human Rights Due Diligence Policy, as a framework to regulate the commitment to respecting Human Rights within the scope of its activities. Therefore, all CAF Members and

Business Partners must act respecting Human Rights in the scope of their activity and in the global value chain.

4.1.2. International sanctions and export control

Suppliers must respect, in any case, the limits imposed by the sanctions and/or restrictions of the European Union and other international reference organizations in relation to different products, markets, jurisdictions, groups, companies, public administrations or individuals.

4.2. Respect and protection of people

4.2.1. Occupational Health and Safety at work

The Occupational Health and Safety of their workers must be a priority for all **CAF** suppliers, who must comply with all applicable laws, regulations and standards. Suppliers must take appropriate measures to prevent occupational illnesses and accidents, as well as to provide a safe and healthy work environment for their workers, so that the life, health, or physical integrity of people is not endangered. Likewise, suppliers must provide **CAF** with the necessary information so that **CAF** can equally protect its workers and the environment (for example, distribution of information regarding hazardous substances and their correct treatment, as well as compliance with applicable regulations. regarding the coordination of business activities).

CAF recommends to its suppliers:

- Have an Occupational Health and Safety Management System focused on continuous improvement and that contributes to integrating the preventive culture into all of its activities, positively valuing its external certification (ISO 45001).

4.2.2. Working Conditions

All suppliers must respect the laws and regulations that apply to them regarding labour matters, including, at a minimum, working conditions (minimum wage, length of the working day, rest days, compensation) and compliance with the provisions of the agreements. fundamental principles of the International Labor Organization (ILO) relating to freedom of association and the effective recognition of the right to collective bargaining: the elimination of all

forms of forced or compulsory labour; the effective abolition of child labour; the elimination of discrimination in employment and occupation; and a safe and healthy work environment. Torture and cruel, inhuman and degrading treatment are expressly prohibited.

4.2.3. Equal treatment

Suppliers must guarantee equal treatment of their workers, regardless of their skin colour, nationality, ethnicity, social environment, disability, gender, sexual identity and orientation, marital status, political or religious beliefs, age or any other circumstance that may be a source of discrimination, guaranteeing a workplace free of harassment and promoting equal opportunities among them. Workers must be protected against acts of psychological violence and against any attitude or behaviour that is discriminatory or harmful to the person, their convictions, and preferences.

4.3. Environment

CAF suppliers must carry out their activity under the premise of minimizing negative environmental impacts and preventing pollution, ensuring compliance with legal requirements, promoting research, development and innovation that improves processes and seeking to train their workers on appropriate environmental management.

In any case, suppliers must:

- Do everything possible to optimize the use of resources, minimize pollution and greenhouse gas emissions by maximizing the use of secondary raw materials. (those materials obtained “for the second time” as a result of recovery, as they include materials and waste that can be reused for various purposes, simply through processing).
- Make efforts to improve energy efficiency, make use of renewable energy and reduce water consumption.
- Reduce, reuse and recycle waste to build a sustainable resource circulation system and strive to minimize waste and residual products throughout the product life cycle.
- The goods supplied to **CAF** must be able to be treated correctly at the end of their useful life, reducing the waste generated and

enabling their disassembly and recovery, to the extent possible.

- Do not provoke the illegal appropriation of lands, forests and waters.
- Avoid the degradation of biodiversity and ecosystems.
- Carry out adequate and safe management by appropriately trained people, regarding the identification, handling, transfer, storage, use and recycling or elimination of chemicals and other substances and materials that may pose a danger to people or the environment. In this sense, suppliers undertake to ensure, through their own means, compliance with all legislation and regulations applicable to the control of chemical substances and restriction of the use of prohibited substances such as the directives:
 - RoHS: Restriction of Hazardous Substances.
 - REACH: Registration, Evaluation, Authorisation and Restriction of Chemicals
 - CLP: Classification, Labelling and Packaging of chemical substances.
 - TSCA: Toxic Substances Control Act in United States.

when these are applicable, providing the information and/or documentation that is necessary in accordance with the applicable regulations.

CAF recommends to its suppliers:

- Have an Environmental Management System focused on continuous improvement and that contributes to reducing environmental impacts, positively valuing its external certification (ISO 14001 or equivalent).

4.4. Anti-corruption and prevention of bribery, gifts and hospitality policy, donations, sponsorships, and conflicts of interest

CAF promotes integrity and ethics in all its activities and declares its zero tolerance against fraud and corruption. All CAF suppliers must comply with

applicable laws and regulations, especially regarding the fight against corruption, bribery and extortion, and must promote and behave in accordance with the principles of fair competition, honesty and integrity, both in their relationship with CAF, as with any other public or private organizations.

No provider should make or approve an illegal payment under any circumstances. The concept of corruption includes both facilitation payments and extortion payments:

- Facilitation payments: considered a small delivery of value to a public official or a person who has been assigned similar processing or certification functions, to ensure or accelerate the performance of a routine action that does not entail a discretionary act on their part.
- Extortion payments: consist of a payment made under threat, extortion or any other circumstance that may endanger the integrity or life of those who must make them.

CAF does not accept any type of gift or present that may be interpreted as something that exceeds normal commercial practices or courtesy.

Suppliers must always comply with applicable national and international laws on money laundering and terrorist financing, cooperating fully with the authorities responsible for combating money laundering or the financing of any illicit activities when required.

Suppliers are required to develop conduct or behaviour that does not jeopardize compliance with the obligations, principles, and limits of the CAF Code of Conduct regarding conflicts of interest, ensuring, in any case, compliance with due diligence obligations, through timely coordination, transparency and communication.

4.5. Responsible acquisition of raw materials

Suppliers that supply raw materials (or goods produced from them) related to the financing of armed conflicts, human rights violations, environmental destruction, and climate change, such as those considered conflict minerals, undertake to support CAF in its efforts towards the implementation and management of a responsible supply chain.

Consistent with the above, suppliers undertake to reduce as much as possible the use of those considered rare earths, complying with the applicable regulations in this regard.

CAF maintains a firm commitment to responsible acquisition in the countries in which it operates (in matters of Human Rights, deforestation, minerals from conflict zones, dangerous substances, as well as any current or future regulations that may apply in this matter).

CAF suppliers commit to:

- To demand a similar commitment throughout their respective supply chains, deploying the measures adopted at their different stages.
- To provide the required information regarding operations, products, and their characteristics (for example, presence of dangerous substances, data on emissions, information on the supply chain, etc.).
- To collaborate in the development of actions related to compliance with the applicable legal requirements and, in those cases in which its participation is assessed as necessary, with other initiatives in the field of sustainability in the supply chain to which **CAF** can be adhered to (for example, sectoral initiatives)

4.6. Protection of intellectual and industrial property

The use of any type of products, programs, systems, and technological knowledge in general must be carried out in compliance with current regulations and legislation on intellectual and industrial property, respecting the assets of third parties and in particular, confidentiality and legitimate rights of industrial and intellectual property and third-party business secrets.

In particular, suppliers develop, implement, and maintain effective methods and appropriate processes in their products to minimize the risk of introducing counterfeit parts and materials into the products they deliver.

4.7. Cybersecurity, protection of personal data and privacy

CAF requires all its suppliers to make a commitment to information security and cybersecurity. Suppliers

must take responsibility for protecting the data, both personal and non-personal, in their possession.

In particular, information of all kinds obtained as a result of the relationship with **CAF** must be treated with absolute reserve and confidentiality, and suppliers must adopt sufficient security measures to protect it. **CAF** suppliers undertake to process personal data to which they may have access as a result of the provision of their services only following **CAF** instructions, and to adopt the necessary measures to comply with the laws, regulations and standards applicable in matters of privacy, data protection and information security.

5. INFORMATION SYSTEM (WHISTLEBLOWING CHANNELS)

5.1. Internal information system of CAF

As a sign of its commitment to an ethical culture and regulatory compliance and in order to generate an environment of transparency and promote respect for legality and the standards of conduct and commitments established in its Code of Conduct, **CAF** has implemented an Internal Information System, which is configured as the preferred channel for reporting on actions or omissions constituting serious or very serious criminal or administrative infractions (including violations of European Union law), or non-compliance or indications of non-compliance with the **CAF** Code of Conduct or any other rule of the **CAF** Internal Regulatory System.

CAF 's Internal Information System is composed of several reporting and internal communication mechanisms in compliance with the various legislations and good practice guides in the countries in which it operates regarding whistleblower protection and use of information channels (also called whistleblowing channels). This System integrates into a single computer platform all the specific and individualized channels, existing or newly created, of each of the **CAF** entities, allowing us to know, in each case, the recipients of the communications.

This Internal Information System has been configured in compliance with some principles, guarantees and rights of both the informants and related third parties, as well as the people affected by the communication. All these principles, guarantees and rights are regulated in the **CAF** Internal Information System Policy and in the Procedure that develops it.

Both access to the Internal Information System and the standards that develop it are publicly accessible on the corporate website www.cafmobility.com and on the websites of the dependent entities, in accordance with the requirements applicable to each country.

If a breach of the Code of Conduct is identified, the members of the group must communicate it through the aforementioned Internal Information System. Likewise, any other third party has the possibility at any time to use the Internal Information System.

When the contravention or non-compliance with the provisions of this Code is investigated and confirmed, disciplinary measures will be adopted, in the labour or contractual sphere, in commercial relations with Business Partners that are considered proportional to the risk or damage caused.

5.2. Supplier whistleblowing channel requirements

Supplier whistleblowing channels must comply with the applicable corresponding legislation. In any case, they must guarantee confidentiality and the prohibition of retaliation against the reporting person.

6. RESPONSIBILITIES

CAF reserves the right to verify compliance with this Code by its suppliers. Such verification can be carried out through various means, for example, through self-assessment questionnaires or audits at the supplier's facilities that are notified in advance. The verifications or requests for information deal with the different aspects or sections of this Supplier Code of Conduct.

Likewise, CAF undertakes to provide appropriate training to facilitate suppliers' compliance with this Supplier Code of Conduct and the latter to provide CAF with all relevant information for this purpose.

In the event that the supplier, in the development of its own activity for CAF or in its participation in the market with third parties, adopts behaviour that is not in accordance with the General Principles of the Code of

Conduct, CAF is entitled to take the appropriate measures, and may reject future collaboration with said supplier and even terminate the current relationship, given the concurrent circumstances.

All suppliers have the email address esg@caf.net available to consult any questions regarding the Supplier Code of Conduct.

To facilitate its knowledge by interested parties and recipients, this Supplier Code of Conduct is published and is accessible on the website (www.cafmobility.com).

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Signature:

Aitor Galarza

Chief Financial and Strategy Officer (CFSO)

Marta Baztarrica

Chief Legal and Compliance Officer (CLCO)
representing the Compliance Function

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