

## **ANNEX: Code of Conduct for Suppliers and Subcontractors**

Redsys and the group companies are obliged to comply with the ethical, integrity and regulatory compliance principles. The principles and ethical guidelines of Redsys are binding rules for all directors, managers, employees and partners of Redsys.

### **Code of Conduct**

Redsys also expects from its subcontractors and suppliers an integrated conduct, faithful to the law and ethics that corresponds with the principles, basic rules and standards mentioned below:

- Applicable law

The supplier of Redsys must comply with the current legislation of the country in which it operates, also avoiding any conduct that, although legal, could damage the reputation of Redsys.

- Anti-corruption measures

The subcontractors and suppliers will actively and consequently fight against any type of punishable or unethical influence in relation to the decisions of Redsys or other companies and institutions and will act against corruption in the company itself. This means:

- Not to make or offer, directly or indirectly, any payment in cash or in kind or of any type, to a natural or legal person at the service of any authority, entity, public or private, in order to obtain or maintain advantages or businesses.
  - The supplier will not make, offer or accept, due to the Redsys contract, any payment in cash or in kind or of any type from/to a physical or legal person, in order to obtain or maintain advantages or business for himself or herself or a third party, which could give rise to a conflict of interest between the supplier or the third party and those of Redsys.
- Measures against prohibited agreements

Subcontractors and suppliers will not participate in illegal restrictive agreements from competition and will act against prohibited cartels.

- Measures against illegal and clandestine employment

The subcontractors and suppliers will observe the corresponding legal regulations for the hiring of employees and will proceed effectively against illegal (including, forced labour, child labour) and clandestine employment.

- Respect for Human Rights

The provider shall act with respect for all internationally recognized human rights, which include, at a minimum, the rights set forth in the International Bill of Human Rights<sup>i</sup>, which include civil, political, economic, social and cultural rights. The supplier shall also comply with the fundamental rights principles set out in the Declaration of the International Labour Organization concerning fundamental principles and rights at work.

- Respect for the fundamental rights of workers

Subcontractors and suppliers will comply with the duties and obligations regarding safety, health and confidentiality of their employees and will undertake to comply with the principles of respectful, fair and non-discriminatory treatment and respect for freedom of association and collective bargaining. They will hire and remunerate their employees on the basis of fair contracts and in accordance with the law, as well as they will meet the basic international contracting standards.

- Production traceability

The subcontractors and suppliers will not transfer the production to third parties without the prior written authorization by Redsys. Similarly, subcontractors and suppliers will apply the principles of this Code to home-based workers who are part of their production chain and will give transparency to the places and working conditions of said workers.

- Transparency and sustainability of contracting

The subcontractors and suppliers will maintain an honest, thorough and transparent behaviour in their activity, carrying an adequate system of accounting records, which facilitates the traceability of their decisions, as a preventive measure against all corruption, bribery and extortion that may occur. Subcontractors and suppliers will not offer, grant, solicit or accept gifts or hand-outs from Redsys buyers. Notwithstanding the foregoing, gifts of a promotional nature, courtesy gifts or usual business courtesies may be accepted, never in cash or equivalent and never more than € 150 (to calculate the amount, all gifts and commercial courtesies from the same provider in a period of six months will be taken into account). In no case should be accepted those that by coincidence in time or for other reasons might be perceived to be made with the intention of influencing the professional decisions to be adopted. Subcontractors and suppliers will not manipulate or influence their workers or falsify files or records in a manner that alters the verification processes of compliance with this Code.

Subcontractors and suppliers will not offer or accept any type of remuneration that intentionally or unintentionally intends to interfere in the impartiality or objectivity of those parties designated by Redsys for the performance of inspections and audits to comply with this Code.

- Product health and safety

The subcontractors and suppliers are responsible for ensuring that all the products supplied to Redsys meet the Health and Safety standards of Redsys so that the items sold do not imply risks for the client.

- Respect for the environment

The subcontractors and suppliers will observe the legal regulations regarding the environment and minimize the harmful effects to the environment.

- Confidential information

The subcontractors and suppliers have the obligation to preserve the integrity and confidentiality of the information they receive as a result of the commercial relations they maintain with Redsys.

The obligation of confidentiality will remain after the conclusion of their relationship with Redsys and will include the obligation to return any material related to the company that the manufacturer or supplier has in his/her possession.

### **Implementation of the Code**

Sub-contractors and suppliers will implement and apply programs to put into practice the Code of Conduct. They must designate a representative of the Management who will be responsible for its application and compliance. The subcontractors and suppliers must disclose their content to all their employees and to those who, in any way, are involved in the Redsys production chain.

### **Control and supervision of compliance**

Sub-contractors and suppliers will authorize Redsys and/or designated third parties to supervise the proper compliance with the principles of conduct established in the Code of Conduct. For this, they will provide the means and access to the facilities and the necessary documentation to ensure such verification.

### **Duty of cooperation**

Subcontractors and suppliers must notify any breach of the Code of Conduct established herein to the extent that the commercial relationship with Redsys is affected, as well as other knowledge of inappropriate behaviour on the part of Redsys employees.

To this end, the communications made under this Code, whether containing complaints of noncompliance or queries regarding their interpretation or application may be sent to the company through the Ethical channel enabled on the Redsys website.

Subcontractors and suppliers must actively resolve suspected cases and collaborate unconditionally with Redsys.

### **Exercise of ARCO rights**

You can exercise your rights on data protection, providing a written communication to the to the attention of data protection officer, at the address "calle Francisco Sancha, n.12 (C.P. 28034 Madrid, Spain), or sending an email at [dpd@redsys.es](mailto:dpd@redsys.es) as described in our Privacy Policy available on <http://www.redsys.es/>

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<sup>i</sup> It consists of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and its two Optional Protocols (1st and 2nd), as well as the International Covenant on Economic, Social and Cultural Rights.