

## **SUPPLY CHAIN SUSTAINABILITY POLICY**

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## Introduction

R&G TELECOMM GROUP is committed to conducting its business in an ethical and responsible manner and promoting sustainability throughout its supply chain operations. We believe that it is our responsibility to minimize the negative impact of our operations on the environment and to support human rights and fair labor practices in our supply chain.

## Scope of application

This Policy applies to all Purchases of Products and Services for the R&G TELECOMM GROUP, regardless of its operations and geography. Similarly, it refers to the entirety of the R&G TELECOMM GROUP supply chain, applying to both direct and indirect suppliers. This implies the supplier will respond jointly and severally, and without limits, for any breaches of the minimum standards included in this Policy.

## The basic standards for sustainable business

To fulfil our responsibility commitment throughout our value chain, we expect our suppliers to comply with our conduct code, which are based on the respect for and promotion of Human Rights as well as three basic values - integrity, commitment and transparency-, or equivalent principles of their own.

- A. **Respect for the Law** Compliance with the Law: the supplier must at all times comply with applicable international, national or local regulations
  
- B. **Ethical and responsible criteria**
  - b.1 **Anti-corruption:** R&G TELECOMM GROUP works in accordance with current legislation, professional ethics and



internal rules, not accepting any form of corruption, extortion or bribery. Suppliers will actively and consistently fight against any type of influence contrary to law or ethics with respect to the decisions of R&G and will act against corruption in their own company. This includes prohibiting all forms of bribery and not permitting any person to promise, offer or give any benefit or advantage of any nature to any person for the purpose of influencing decisions of any kind (including governmental, administrative or judicial) or obtaining undue advantage, or offering or accepting gifts, entertainment or other incentives that may reward or influence a business decision.

**b.2 Conflicts of interest:** R&G TELECOMM GROUP believes that the relationship with its suppliers should be based on loyalty that stems from common interests. In this regard, suppliers must maintain mechanisms to avoid situations of conflict of interest and to guarantee independence in the actions carried out within the framework of their relationship with R&G and their full compliance with applicable legislation. A conflict of interest is any situation in which the interest of R&G and the interest of the supplier, of persons employed by the supplier or of persons and entities linked to them collide, directly or indirectly.

**b.3 Human Rights:** As part of its commitment to Human Rights, R&G TELECOMM GROUP conducts a due diligence process to avoid causing, avoid contributing or being linked to human rights violations. To minimize any possible risk in this regard in the supply chain, suppliers of R&G shall implement internal processes to identify, avoid and mitigate possible adverse impacts of their activities on human rights.

## C. Social Criteria

Social Responsibility and Labor Practices R&G TELECOMM GROUP is committed to promoting ethical and fair labor practices in its supply chain. We expect our suppliers to adhere to all applicable labor laws and regulations and to provide a safe and healthy working environment for their employees. Suppliers are also expected to pay fair wages and benefits and to refrain from using forced or child labour.

**c.1 Labour relationship:** The work done by the employees of the supplier must be based on a recognized labour relationship established in accordance to all applicable legislation. The obligations of the company with respect to its employees regarding labour or social security norms will not be avoided. Abuse of service provision contracts or the recurring use of subcontracts, to avoid legal obligations will not be allowed. Workers must be provided with a written employment agreement in their native language. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment.

**c.2 Working hours:** The supplier's standard working hours shall respect national legislation and industry reference standards, with the criteria that offer the highest levels of protection for the employee prevailing. Workers shall not be required to work more than 48 hours per week on a regular basis and shall be provided with at least one day off for every average period of 7 days. Overtime required by the employer shall be voluntary, shall not be requested on a regular basis, and shall always be compensated at a special rate.

**c.3 Salaries:** The employee's remuneration must meet or exceed national or, where applicable, local minimum legal requirements. The supplier must pay at least the minimum wage required by the law in force in each country for normal working hours, overtime and the differential corresponding to overtime. Salaries shall not be paid in kind and must be sufficient to meet basic needs. Employees must receive understandable written information on their working conditions with respect to salary prior to the

**c.4 Violence and Harassment at Work:** The supplier will promote a zero-tolerance environment for violence and harassment. Abuse or discipline by physical means, threat of physical abuse, sexual or other harassment, verbal abuse, or other forms of intimidation are prohibited.

**c.5 Forced Labour and Trafficking in Persons:** Labour shall not be carried out in conditions of slavery, nor shall it be involuntary or forced. Workers are not required to give "deposits" or identity documents to their employers and will be free to leave their jobs upon legally established notice. The supplier must operate defined policy and process to ensure that nowhere in its supply chain, or in its own business, is labour provided under conditions of slavery or trafficking in persons taking place. The supplier shall guarantee that there will be no child labour in its activity or its own supply chain. In cases where the supplier is forced to eliminate a situation of child labour it will take place in a manner consistent with the best interests of the children concerned. Children and young people under the age of 18 that, according to local legislation may have access to the job market shall not work during the night or under dangerous conditions.



**c.6 Non-discrimination:** - The supplier will internally promote diverse teams, guaranteeing the same opportunities among its employees - It shall pursue a policy of equality and there shall be no discrimination in recruitment, compensation, access to training, promotion, termination or retirement on grounds of gender, gender identity, ethnic origin, caste, colour, pregnancy, family status, national origin, religion, age, disability, sex, marital status, sexual orientation, trade union membership or political affiliation, or any other circumstance.

**c.7 Promote the implementation of conciliation measures** that favour respect for the personal and family life of its employees, facilitating the best balance between the latter and their work responsibilities according to applicable laws. Workers shall be allowed to practice their religion under reasonable circumstances. - Workers shall not be subjected to medical tests or physical exams that could be used against them in a discriminatory way.

**c.8 Health and Safety:** - The supplier shall provide its employees with a safe and healthy working environment, taking into account local, national and international standards and in accordance with the specific hazards/risks of each activity. - Adequate measures must be taken to prevent injury and the occurrence of accidents, related to or occurring during work, minimizing the causes of the dangers inherent to the activities and work environment. - The supplier shall provide its employees with appropriate tools for their activity, as well as any Individual or Collective Protection Equipment necessary to ensure safe working conditions considering the risk level to which they are exposed. - Workers shall receive training regarding Health and Safety that enables them to identify any dangers associated with the activity and the work environment, and the practices necessary for minimizing the risks.

## D. Environmental

Environmental Sustainability R&G TELECOMM GROUP is committed to reducing the environmental impact of its operations, including those of its suppliers. We expect our suppliers to adhere to all applicable environmental laws and regulations and to adopt environmentally sustainable practices.

Suppliers are also expected to implement waste reduction and recycling programs, use energy-efficient equipment and processes, and reduce greenhouse gas emissions.

**d.1 Climate change:** the supplier will take action to minimize the impact of its activities on climate change considering in its planning for such action the entire supply chain. It should work to reduce its greenhouse gas emissions by setting reduction targets for the next 3 years. To this end, it will promote energy efficiency and renewable energy initiatives in its own activities.

**d.2 Waste:** the supplier must have systematic processes for waste management, giving priority whenever possible to reuse and recycling treatments, with the aim of contributing to the circular economy.

**d.3 Dangerous substances:** the supplier will comply with all laws, regulations and requirements with respect to the prohibition or restriction of dangerous substances. Hazardous chemicals and other materials included in products, especially those listed as Substances of Very High Concern in the REACH Regulation, must be identified and managed to ensure their safe use, recycling or reuse and disposal.

**d. 4 Cooling gases:** The supplier shall not supply equipment containing ozone-depleting gases (such as CFC or HCFC), nor shall it

refuel with these gases. In the offers, priority will always be given to those gases that, being energy efficient, have a lower Global Warming Potential (PCG or GWP). For work associated with the maintenance of cooling equipment, the leakage of these gases into the atmosphere must be prevented in all cases.

### **Business channel for questions and complaints**

Suppliers may raise queries or complaints regarding the compliance of these minimum standards for sustainable business through our confidential channel available at the Website [Become our client - R&G Company \(rg.company\)](http://www.rg.company). All queries will be treated confidentially and thoroughly investigated.

### **Conclusion**

By adhering to this Supply Chain Sustainability Policy, R&G TELECOMM GROUP is demonstrating its commitment to sustainable and responsible practices in its supply chain operations. We believe that our policy will contribute to a more sustainable future for all.

