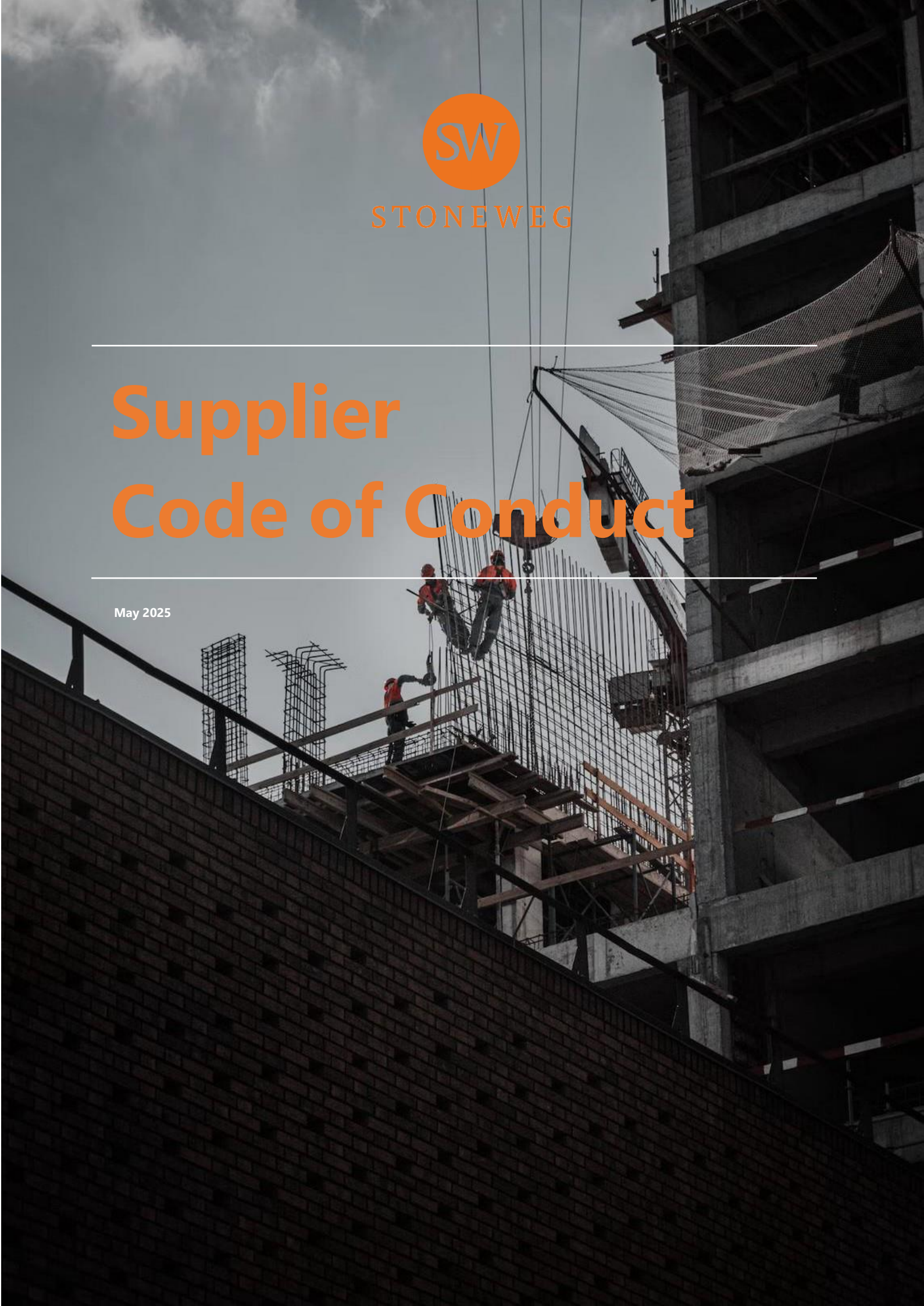




STONEWEG

Supplier Code of Conduct

May 2025





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1. Introduction

The Stoneweg Group ("**Stoneweg**") is committed to ensuring that our activities are socially and environmentally responsible. This includes ensuring the social, environmental and ethical performance of our direct operations as well as the activities undertaken within our value chain. The following guidelines set out the framework of acceptable conduct Stoneweg expects from its suppliers, vendors, and all other third-party companies that comprise the Stoneweg's supply chain ("**Supplier(s)**").

Stoneweg interacts with many Suppliers through its companies and offices. Stoneweg believes that, in many cases, a more proactive approach is required to ensure alignment between Supplier performance and Stoneweg's ESG strategy. That is why, we strongly encourage our employees to take ESG considerations into account during the procurement process and proactively inform current and future Suppliers of our expectations. The Code is publicly available on our website (www.stoneweg.com).

The Stoneweg Supplier Code of Conduct (the "**Code**") sets out Stoneweg's expectations of its Suppliers to conduct business with integrity, honesty, and in compliance with the law. It expects its Suppliers to align their practices with all general principles set out in this Code ("**Principles**"). Stoneweg expects that as providers of products or services, all Suppliers will demonstrate and uphold our values, respect the rights of all people, and uphold human rights in their business operations.

2. Scope

All work performed by a Supplier for Stoneweg and/or any fund or entity sponsored or managed by Stoneweg must be in full compliance with this Code and all applicable laws, rules and regulations. The principles outlined in this Code apply to all Suppliers, regardless of the geographical location of their operations or whether they are engaged in the supply of goods or services.

The Code sets out Stoneweg's expectations of Suppliers to comply with relevant laws, including but not limited to those governing consumer protection, environment, social, anti-competition, human rights, modern slavery, and health, safety, and welfare laws. The Code is designed to capture the core of our expectations, rather than serving as an exhaustive list of all requirements to be followed.

This document is not intended to undermine but to complement our contracts with Suppliers and, in case of conflict, the contractual provisions that we set out when we procure our goods and services take precedence.

3. Statement

Suppliers are expected to demonstrate values that set excellence and best practice in accountability. These include promoting human rights consistent with the International Bill of Human Rights, including:

- The United Nations Guiding Principles on Business and Human Rights;
- The International Covenant on Economic Social and Cultural Rights;
- The UN Global Compact Principles on Business and Human Rights;
- The OECD Guidelines for Multinational Enterprises; and
- Eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work.

Stoneweg expects that Suppliers comply with this Code and in turn to apply an equivalent expectation on their own operations, services and supply chains. Where a Supplier becomes aware of a breach of



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this Code, they are expected to notify Stoneweg immediately and take the necessary steps to rectify the breach.

In entering into a contract for the supply of products, goods or services to Stoneweg, a Supplier is acknowledging these obligations and warranting that to the best of their knowledge, at the point of entry into the supply contract, there are no material breaches in meeting their obligations and expectations set out in this Code.

Suppliers are expected to:

- Develop and maintain a process to identify employment and human rights risks, health and safety risks, environmental risks, business ethics risks, and legal and compliance risks associated with their operations;
- Determine the relative significance of each risk; and
- Implement appropriate procedures and controls to minimise the identified risks.

If requested by Stoneweg, a Supplier is expected to permit Stoneweg's nominated representatives to periodically evaluate a Supplier's facilities and operations, and those of the Suppliers subcontractors, to the extent they are providing goods or services to Stoneweg. Suppliers are expected to maintain appropriate documents and records to ensure compliance with all applicable legal, tax and regulatory requirements.

Stoneweg reserves the right to require an annual declaration of compliance with the Code from a Supplier and to further request evidence of the measures that have been taken to identify and address human rights issues that are directly linked to their operations, products or services.

It is an expectation that the Suppliers will contact Stoneweg immediately where they become aware of any breach of this Code.

4. Compliance with laws

Stoneweg expects its Suppliers to comply and to operate with all applicable laws, rules, and regulations.

5. Principles

We have certain expectations regarding our Suppliers and their activities. These expectations aim to align our supply chain to our global sustainability strategy and ensure that our Suppliers comply with the same high standards in order to effectively minimise the environmental impact of Stoneweg activities, ensure occupational health and safety, and respect human rights.

Anti-bribery and Corruption

Stoneweg does not tolerate corruption or bribery in any form and expects Suppliers to comply with all applicable laws and regulations relating to anti-corruption and anti-money laundering.

Suppliers are never directly or indirectly expected to give, offer, or accept bribes to obtain or retain business or favoured treatment to influence actions or to obtain an improper advantage for Stoneweg, itself or any other third party. This includes any inducement of any kind to any:

- Stoneweg employee;
- Principal or sub-contractor associated with the supply of the product or services; and

- Any other stakeholder, tenant or associate of Stoneweg.

Data Privacy and Information Security

Suppliers are expected to follow all applicable data protection, privacy and information security laws and additionally:

- Respect and protect the privacy of individuals (including, without limitation, Stoneweg and its employees).
- Only collect personal information for business related purposes in connection with the specific services being provided to Stoneweg.
- Retain personal information only for as long as necessary to fulfil the business-related purposes in connection with the services being provided to Stoneweg.
- Only disclose personal information to a third-party where required in order to provide services to Stoneweg or as may be required by applicable laws.
- Collect, use, maintain, disclose (internally and externally), and destroy personal information in a manner that limits the risk of loss, theft, misuse, or unauthorised access.
- Respect intellectual property rights and not knowingly infringe the intellectual property rights of any third party.
- Notify Stoneweg without undue delay in writing and in any event no later than 24 hours after a Supplier becomes aware that a breach has occurred under the General Data Protection Regulation (EU) 2016/679 of 27 April 2016 of the European Parliament and of the Council or any other applicable data protection law.

Conflicts of Interest

In the case of actual or potential conflicts of interest, Suppliers are expected to:

- Promptly report to Stoneweg any instances involving actual or potential conflicts of interest between the Supplier's interest and those of Stoneweg.
- Implement mitigation measures where appropriate.

Customer Orientation and Training

All Suppliers are expected to provide the highest level of cooperation, professional competence, and service-oriented mindset in order to achieve maximum customer satisfaction and meet Stoneweg's expectations. The pursuit of these objectives shall never involve a breach of the law or of Stoneweg's compliance culture.

Suppliers shall maintain, when relevant, training and continuous learning for personal and professional development, with the aim of achieving better performance, quality, and satisfaction in the execution of their duties.

Labour and Human Rights

Suppliers are expected to respect, uphold and promote human rights in their operations products or services. Suppliers are expected to follow the applicable laws in the countries in which they operate.

"Modern Slavery" includes the crimes of human trafficking, slavery and slavery like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of children, and debt bondage.



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Stoneweg expects Suppliers to consider the risks of Modern Slavery practices in their operations and supply chains and identify these where they are found to exist.

These obligations apply to all workers, including, without limitation, temporary, migrant, student, contract, direct employees, and any other type of worker of the Supplier.

For contractual conditions or employment, in addition to any other obligations, Suppliers are expected to comply with the following specific Stoneweg requirements:

Child Labour

Stoneweg expects its Suppliers to:

- Not engage in or condone the unlawful employment or exploitation of children in the workplace;
- Cooperate with law enforcement authorities to address any such instances of child labour that the Supplier becomes aware of.

Human Trafficking, Slavery and the Right to Voluntary Labour

Stoneweg expects its Suppliers to:

- Respect the free choice of all persons and strictly prohibit forced or compulsory labour for any employees.
- Not conduct business with, tolerate, or associate with organisations or entities that condone or are engaged in the practice of coercing or imposing work with little or no freedom of choice.
- Comply with the UN Guiding Principles on Business and Human Rights and the UN Global Compact Principles on Business and Human Rights, and work to raise awareness within its employee population of the Supplier's responsibility to protect human rights.

Freedom Against Prejudice and Discrimination

Stoneweg expects its Suppliers to:

- Maintain an inclusive workplace free of harassment and discrimination based on a person's status, race, colour, religion, national origin, gender, sexual orientation, gender identity, age, disability, veteran or military status or other characteristics protected by law.
- Ensure that it has requisite policies and practices in place to foster a harassment and retaliation free environment.

Safe and Secure Workplace

Stoneweg expects its Suppliers to:

- Provide a safe and secure workplace for all of its employees, customers, and visitors.
- Not tolerate physical violence and threats, corporal punishment, mental coercion, verbal abuse or sexual harassment within its operations or services.

Working Hours and Wages

Stoneweg expects its Suppliers to:

- Commit to be an ethical employer that strives to improve labour standards, respects its



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employees' contributions, and rewards them fairly. Suppliers will:

- comply with all applicable laws dealing with the appropriate payment of wages to employees in line with the prevailing rates (and at least the minimum wage) required by such applicable laws and regulations and including all required benefits.
 - compensate employees for the hours they work including, if appropriate, payment for hours of overtime worked.
- As appropriate, a Supplier's policy will be further defined at the regional and country level to prevent the exploitation of the local workforce.

Freedom of Association

Stoneweg expects its Suppliers to:

- Respect the rights of employees and comply with all applicable laws concerning freedom of association and collective bargaining.

Health and Safety (OHS)

Stoneweg expects its Suppliers to:

- Provide a safe environment for all employees, contractors and partners, ensuring appropriate training and safety measures are adopted and regularly tested.
- Ensure general principles of health and safety risk prevention such as minimizing risks, providing personal protective equipment, and ensuring all machinery and tools are appropriately maintained, in accordance with applicable laws.
- Comply with all applicable health, safety, and security laws of the jurisdictions in which each Supplier does business and limit worker exposure to potential safety hazards.
- Provide employees with proper personal protective equipment at no cost to the employee and to further ensure proper maintenance of the equipment. Employees shall be free to raise safety concerns without fear of retaliation in any form.
- Record, track and report all occupational injuries and illnesses as required by applicable laws.

Fair and Ethical Employment

Stoneweg expects its Suppliers to:

- Ensure all employment contracts are concluded in accordance with local labor laws and the International Labor Organization ("ILO") Conventions.
- Respect human rights of all employees, contractors, and partners (UN Convention on Human Rights).
- Respect the rights of all employees in line with ILO Declaration on Fundamental Principles and Rights at Work.
- Ensure no discrimination, including Supplier's employees, contractors and partners, is made based on race, color, gender, sexual orientation, religion, political opinion or nationality.
- Adopt an anti-bribery and corruption policy which includes a zero-tolerance approach to bribery and corruption.
- Have anonymous whistleblowing and grievance procedures in place.

Environmental Management

Stoneweg expects its Suppliers to:



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- Comply with all applicable Stoneweg policies notified from time to time, as relevant.
- Respect all applicable laws in relation to environmental management and ensure all necessary environmental authorizations, permits or licenses are obtained and maintained.
- Minimise negative impact to the environment by warranting the sustainable use of natural resources.
- Promote energy efficiency and carbon emission reduction.
- Minimise water usage and impacts to biodiversity.
- Reduce waste and promote recycling.

6. Suppliers' commitment

Our Suppliers have a responsibility to identify, notify and remedy any instances where activities fall short of the expectations outlined in this Code.

Suppliers may be subject to a control/audit by Stoneweg. In addition, Stoneweg shall be entitled to conduct due diligence on all Suppliers on a regular basis and Suppliers shall provide Stoneweg with all relevant information required for the purposes of assessing compliance with this Code. Where Stoneweg identifies discrepancies between the expectations as set out in this Code and the data provided by the Supplier, the Supplier shall either implement an appropriate remedy or otherwise explain why it cannot comply with the requirement.

Non-compliance or failure to comply with this Code may lead to Stoneweg seeking to exercise any contractual termination rights as set out in the relevant contract with the Supplier.

7. Reporting concerns (whistleblowing)

All concerns will be taken seriously and where required a confidential investigation will be conducted. Stoneweg will not tolerate retaliation against any person reporting a concern in good faith.

If you have any concerns about actions or decisions made that go against the principles and standards set out in the Code, then please inform your contact person at Stoneweg. If for any reason you feel unable to raise your concern with your Stoneweg contact person, then please contact ***compliance@stoneweg.com***.

In Spain, Stoneweg provides a dedicated communication and whistleblowing channel for suppliers and third parties (***www.buzoncompliance.es***). If for any reason you cannot raise your concern with your Stoneweg contact person or through the mentioned channel, please contact ***compliancespain@stoneweg.com***.