FICOSA RESPONSIBLE SOURCING POLICY



FICOSA

PURPOSE & SCOPE

As a member of the United Nations Global Compact since 2002, FICOSA acts in compliance with social, environmental and ethical principles such as those identified in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the ILO core conventions, and the 2030 UN Sustainable Development Goals (SDGs), among others.

This FICOSA Responsible Sourcing Policy aligns with our values, Code of Ethics, and business policies covering diversity, environment, health, safety and employee relations. The policy also reflects sustainability guidelines, principles and standards for suppliers' business decisions and supplier management.

The Responsible Sourcing Policy applies to all FICOSA companies and sites worldwide, to all purchasing categories and to all suppliers and business partners. We develop and maintain ethical and sustainable relationships with our suppliers and supply chain partners in order to achieve mutual benefits and meet our stakeholders' requirements. In this way, we carefully consider our suppliers' performance, commitment and continuous improvement when selecting and collaborating with them.

FICOSA BUSINESS PARTNER CODE OF CONDUCT

FICOSA wants to ensure its suppliers and business partners operate in line with the company's sustainability principles and respect the Universal Declaration of Human Rights and environmental protection. The preservation of human rights requires respect for ethical rules by everyone. Building strong responsible supply chains is an important focus for us. We expect our suppliers to respect human and labour rights, health and safety, the environment and business ethics, and to source raw materials responsibly. We require our suppliers, when working with FICOSA, to act in a manner consistent with the FICOSA Business Partner Code of Conduct. Additionally, we encourage our suppliers to set expectations for their own suppliers that align with the FICOSA Business Partner Code of Conduct.

DECARBONIZATION PLAN

In line with our core international environmental commitments, FICOSA is working to reduce the CO2 emissions associated with its manufacturing processes and throughout the value chain. We aim to reach Net Zero for Scopes 1 and 2 by 2030 and for Scope 3 by 2050.

Our business partners are critical to help FICOSA reach its sustainability targets, including reduced carbon footprint and increased recycled material content in our products. Suppliers should conduct a full GHG emission inventory – scope 1, 2 and 3 – to focus their efforts on reducing carbon emissions, carbon footprint and becoming carbon-neutral.

ESG REQUIREMENTS FOR SUPPLIERS

The awareness and training for suppliers about ESG criteria is important for the responsible management of the value chain.

Our ESG requirements questionnaire forms an important part of the sourcing process and we evaluate new and existing suppliers' performance. We identify potential high risk areas, encourage our supplier network, and work closely with the relevant suppliers in order to be able to react resiliently and efficiently to any change in the market. We apply a risk-based approach to assess and monitor our suppliers and, where necessary, audit them, and agree corrective actions where needed. Non-compliance may lead to corrective action plans and, in serious cases, to the end of the business relationship.

FICOSA continuously reviews and improves its management systems, processes, and tools to implement best practice and promote sustainability in our value chains. FICOSA sets annual sustainable procurement objectives in the Purchasing Balanced Scorecard, covering supplier ESG assessment, supplier decarbonization and training, and reports progress in its Procurement Sustainability Report.

PROCUREMENT ETHICS

FICOSA purchasing decisions are based on objective criteria such as quality, cost, delivery, technical capability and sustainability performance. In line with FICOSA's Code of Ethics, employees must not offer, receive or authorize any consideration to or from a supplier in order to obtain an undue advantage, and must report to the Compliance Department any activity that could conflict with FICOSA's interests.

FICOSA does not engage with suppliers involved in fraud, corruption or other serious misconduct, and any suspected conflict of interest between FICOSA personnel and a supplier is reported and investigated in accordance with the Code of Ethics.

Employees, business partners and collaborators, including suppliers, can report any serious breach of the Code of Ethics through FICOSA's Compliance Channel (compliance.channel@ficosa.com). Reports can be anonymous, are treated confidentially, and no retaliation is taken against good-faith reporters.

COMMUNICATION AND TRAINING

The Responsible Sourcing Policy is available to all FICOSA employees and is published on FICOSA's website. Purchasing teams receive regular training on ESG and decarbonization requirements. Suppliers are informed of the requirements through the General Purchasing Conditions, the Business Partner Code of Conduct and the ESG questionnaire.

REVIEW AND APPROVAL

This policy is approved by FICOSA's Sustainability Committee, which includes representatives from Purchasing, Environment, Sustainability, Finance, Engineering, Marketing, Human Resources and Compliance. The Chief Purchasing Officer owns the policy and the Sustainable Procurement Leader deploys it. It is reviewed at least every two years, or earlier when regulatory or business changes require it. Each new version is communicated to the Purchasing teams and published on FICOSA's website. The next scheduled review is due two years after the date of approval of this version.

RELATED DOCUMENTS

- General Purchasing Conditions
- Supplier Quality Manual
- FICOSA Business Partner Code of Conduct
- Code of Ethics
- Responsible Sourcing instruction

VERSION CONTROL

Version	Date	Description
1.0	24/10/2024	First publication
2.0	01/09/2026	Added Procurement Ethics, Communication and Training, and Review and Approval sections; updated scope, supplier commitments, due diligence approach, objectives and responsibilities