SUSTAINABLE PURCHASES POLICY

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1. OBJECTIVE AND SCOPE

The purchasing activity is one of CLECE's key functions due to its significant economic, environmental, and social impact.

This policy is aligned with the ACS Sustainability Report, which sets the Group's strategy and establishes the basic principles of action in terms of transparency, ethics, legal compliance, Human Rights, etc.

The purpose of this policy is to consolidate stable and long-lasting relationships with suppliers, beneficial for both parties, in accordance with our Commercial Partners' Code of Conduct, the company's Environmental Policy, and the principles of the United Nations Global Compact. These relationships must be fundamentally based on strict legal compliance, enabling us to meet our clients' requirements and expectations and create sustainable value.

This policy is mandatory for all activities carried out by Clece Care Services Ltd ("CLECE") and its subsidiaries, regardless of their geographical location, and is therefore binding for all members of the organisation, especially those involved in the purchasing process.
CLECE will promote the application of this Policy among its business partners and reserves the right to discontinue collaboration with suppliers who contravene it.

2. BASIC PRINCIPLES

CLECE establishes the following basic principles of action to ensure that purchasing activities are carried out correctly and under the best conditions of quality, deadlines, price, and respect for the environment and human rights.

- Relationships with suppliers will always be based on **mutual respect, transparency, confidentiality**, and **free competition**.
- Anyone performing purchasing functions must comply with internal regulations, acting in accordance with CLECE's **Code of Conduct** and the company's other policies.
- In the selection of suppliers and contractors, fair and loyal competition will be promoted, acting with impartiality and independence and always avoiding potential conflicts of interest.
- Throughout the purchasing process, and particularly in the selection of suppliers and contractors, not only quality, deadlines, and price criteria will be considered, but also Environmental, Social and Governance (ESG)

criteria that contribute to creating a socially responsible and sustainable value chain.

- Where possible, technological advances offered by suppliers will be promoted and leveraged to improve service efficiency and reduce negative environmental impacts.
- Whenever possible, sustainable services and/or products will be chosen, favouring ecological materials or those with Ecolabel or similar certification, products without hazard pictograms, machinery with higher energy efficiency, and lower-emission vehicles.
- Suppliers will be required to comply with all applicable legislation and regulations on Human Rights, including:
  - Modern Slavery: all suppliers, regardless of size or statutory reporting thresholds, must undertake proportionate Modern Slavery due diligence. This includes verifying labour supply chains, ensuring ethical recruitment practices, and providing evidence of controls to prevent forced labour, debt bondage, or human trafficking.
  - Fair pay and conditions: all suppliers must guarantee fair and lawful employment practices, including payment of at least the national minimum wage (or Living Wage where applicable), transparent scheduling, and the avoidance of exploitative zero-hour arrangements that undermine worker stability or wellbeing.
- Suppliers will be required to respect the environment through proper management of the service life cycle.
- CLECE considers that its suppliers are committed to the fight against corruption, acting under the principle of zero tolerance towards any unlawful act or conduct contrary to the values and principles of CLECE's Business Partners' Code of Conduct, its Criminal Risk Prevention and Anti-Bribery Policy, and its guiding principles of prevention.
- CLECE will promote among its suppliers the adoption of responsible and sustainable standards and criteria, in compliance with the Corporate Social Responsibility Standards to which CLECE adheres. Essential elements of these standards include the rejection of forced or child labour, any form of discrimination, and, in general, the respect and support of internationally recognised human rights.
- CLECE will encourage suppliers to align with these principles and values to ensure that all participants in its value chain share them. These aspects will

be assessed in the supplier approval process.

- CLECE will inform and encourage suppliers to use its Ethics Channel in good faith, so that—without fear of retaliation and based on reasonable indications—they may report non-compliance, unlawful acts, or irregular conduct that contravenes the Law, our Ethical Code, or this corporate policy.

3. NON-COMPLIANCE

CLECE will monitor compliance with the principles contained in this Policy, in line with corporate strategy, through the corresponding indicators.

Non-compliance with the provisions of this Policy and applicable legislation may entail serious consequences for CLECE or its subsidiaries, employees, and managers. Therefore, this Policy is considered a mandatory standard, and its breach will constitute a serious infringement of CLECE's Compliance Management System.

Consequently, CLECE will adopt the appropriate disciplinary measures in accordance with labour legislation, without prejudice to any other liabilities that the offender may incur.

4. POLICY REVIEW

The Group Head of Finance will be responsible for updating the content of this Policy, incorporating recommendations and best practices in force at any given time, and will propose to the company's Management any modifications and updates that contribute to its development and continuous improvement.