CODE OF ETHICS FOR SUPPLIERS

GLOBALIA

Authorisations and version control

Version	Approval date	Brief description of the change
1.0	25/01/2018	Implementation
2.0	25/06/2025	Update of different sections Inclusion of a new Notification section to include links to the Ethics Channel.

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GLOBALIA GROUP COMPANIES



Globalia's Code of Ethics includes in its purpose and scope of application the need to extend to our suppliers, collaborators and contractors a framework of ethical conduct that guides relations between both parties.

1. PURPOSE AND SCOPE

In order to establish a framework of trust and collaboration between Globalia and its suppliers, contractors and collaborators, this Supplier Code of Ethics has been drawn up with the aim of strengthening commercial relationships based on the principles set out in Globalia's Code of Ethics, which underpin the way we carry out our purchasing and contracting processes.

Globalia expects its suppliers, contractors and collaborators to go beyond strict compliance with current legislation and commit to accepting the ethical values set out in this 'Supplier Code of Ethics'.

In turn, Globalia trusts that these suppliers will ensure that their own suppliers observe values similar to those set out herein.

2. OUR ETHICAL VALUES

- **Normality:** At Globalia, we act normally and work to achieve the objectives demanded by a modern society.
- **Honesty:** We act with honesty, sincerity and consistency.
- **Adaptability:** Our daily work is based on understanding what society demands, not only what it needs, but also how it needs it, responding with the necessary means.
- **Teamwork and professionalism:** Our staff is the backbone of our group and our greatest asset. We encourage teamwork, employee effort, equal opportunities and training so that our staff can develop their full potential.
- **Integrity:** We are steadfast in the commitments we have made and in our adherence to our principles.
- **Leadership:** Ethics and values make companies stronger, and our goal is to maintain, strengthen and improve our leadership every day.

3. RULES OF CONDUCT

Globalia's suppliers, contractors and collaborators shall conduct their business and professional activities in an ethical and honest manner, taking into account the following rules of conduct:

Preventing fraud, bribery and corruption: suppliers, collaborators and contractors shall comply with the laws, rules and regulations of the countries where they operate, and shall provide accurate information in financial, business or commercial publications.
business or commercial publications.

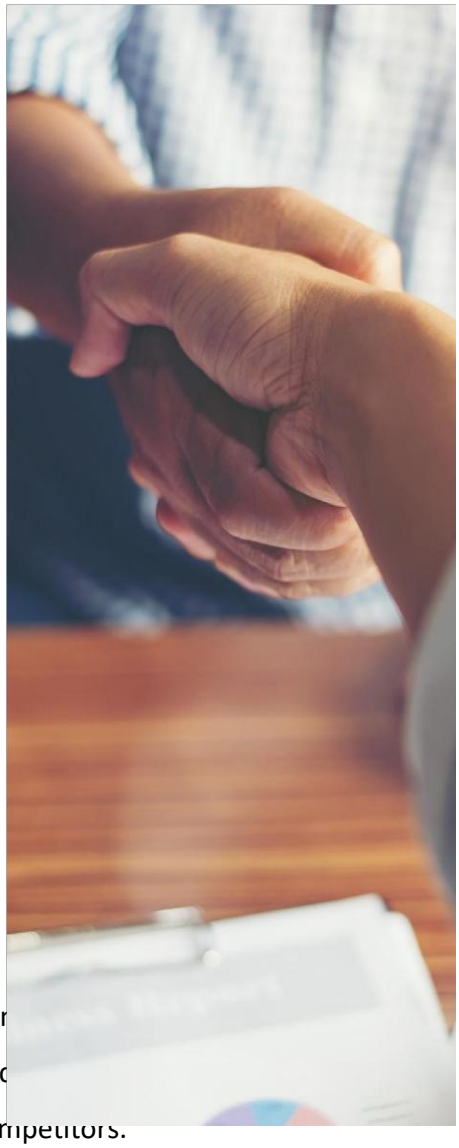
Furthermore, in order to maintain and guarantee their independence, they must identify and be able to resolve any actual or potential conflict of interest involving any of their employees. They must categorically reject corruption in all its forms, extortion and bribery. No supplier may offer or make, directly or indirectly, payments through any means, including payment in kind or any other kind of benefit, to any natural or legal person for the purpose of:

- Illegally obtain business or a competitive advantage.
- Cause the natural or legal person to use or abuse their influence to unlawfully obtain any business or competitive advantage.

Suppliers and third parties are informed of the existence of Globalia's Gift and Invitation Policy.
invitations. This Policy establishes that gifts may be accepted from third parties provided that such gifts have been made voluntarily by the third party and do not, under any circumstances, influence the decision-making capacity of the third party in any way. It is prohibited to give gifts in the form of cash, gift cards, cheques or lottery tickets. Invitations to social and group events in which work is carried out on behalf of
group companies.

Occupational health and safety: suppliers must guarantee a safe environment that avoids any risk to the health and physical integrity of their workers and complies with all occupational health and safety specifications, as well as the specific regulations applicable to the sector. Suppliers shall respect the protection of human rights by rejecting child labour and forced labour and all forms of exploitation or taking advantage of situations of need or vulnerability.

Prevention of workplace harassment: suppliers shall reject and not allow any manifestation of violence, exploitation or sexual, physical, psychological or moral harassment, abuse of authority or mistreatment.



Information processing, transparency and confidentiality: all non-public information belonging to Globalia that is owned or held by the supplier must be treated as confidential and/or for internal use only, and it is the supplier's responsibility to take the appropriate measures to protect such information. The supplier must comply with the requirements regarding personal data protection and, specifically, with Regulation (EU) 2016 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation).

Fair competition: suppliers shall respect fair competitior
consumers. In addition to the regulations that must be c
their business in an ethical manner in relation to their competitors.



During the execution of the Contract, the supplier shall look after Globalia's interests, ensuring that no situation arises that could give rise to conflicts of interest in relation to the activities to be carried out. To this end, the supplier shall take all measures within its power to detect such conflicts and shall immediately notify Globalia in writing (via its Ethics Channel) of any situation that could give rise to them. The supplier shall cooperate with Globalia as appropriate, complying with the instructions given by the latter, after consultation and evaluation of the circumstances.

(through its Ethics Channel) of any situation that could give rise to such conflicts and shall cooperate with Globalia as appropriate, complying with the instructions given by the latter, after consultation and evaluation of the circumstances, in order to avoid such conflicts.

By signing the Contract, the supplier, as a natural person, declares:

1. That they do not hold a senior management position (director, senior manager with strategic responsibilities), are not an employee of the Organisation or an auditor of Globalia's accounts within Globalia;

2. That they do not have, within Globalia, family members/relatives up to the second degree/spouse not legally separated/cohabiting partner/husband or children of their partner/who are related to them by blood or affinity;

3. That neither he nor his respective family members (non-separated spouse or first-degree relatives) have held or currently hold, in the last 24 months, positions in the Public Administration or in entities responsible for public services that have directly related to activities carried out by Globalia.

The supplier, as a legal entity, by signing the Contract, declares that, based on its knowledge of its corporate structure, no person belonging to its governing, management or control bodies:

1. is a member of senior management or the administrative bodies, or an executive with key responsibility at Globalia, nor is a relative up to the second degree, spouse, partner, child of a spouse or partner, or dependent person (by kinship or marriage) of the aforementioned members.

2. They are not an employee of Globalia, nor are they a relative up to the second degree, spouse, partner, child of a spouse or partner, or dependent (by kinship or marriage) of the aforementioned employee.

3. Neither the person themselves nor their respective family members (non-separated spouse or first-degree relatives) have held, in the last 24 months, positions in the Public Administration or in entities responsible for public services that have had a direct relationship with activities carried out by Globalia (granting concessions, control activities, etc.).

The supplier undertakes to notify Globalia of any changes that may occur subsequently and while it is an active supplier, with respect to the information declared prior to the signing of the Contract.

4. COMMUNICATION OF INCIDENTS AND IRREGULARITIES

Suppliers may report any incident or irregularity related to this Code and its management through the corporate website in the Ethics Channel section, using the following links:

Globalia: https://globalia.canaletico.es/

Air Division: https://aireuropa.canaletico.es/

Such communication is guaranteed to be confidential. Likewise, in the event that a Globalia employee requests a gift or invitation from a supplier, either for the employee's personal use or for the benefit of Globalia, this incident must be reported by the supplier to Globalia through the Globalia or Air Europa Ethics Channel.



5. COMPLIANCE AND SUPERVISION

This Code of Ethics must be accepted by all suppliers, contractors and collaborators in order to enter into a commercial agreement with Globalia and will be included as an annex to the corresponding contracts. Each and every supplier must authorise Globalia to supervise proper compliance with this Code and, to this end, the means and access to the facilities and documentation necessary to carry out supervision and control of compliance will be provided.


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