



Supplier Code of Conduct of the Línea Directa Group



linea directa

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1. Introduction

The Supplier Code of Conduct of the Línea Directa Group establishes the minimum expectations of conduct for suppliers, contractors and collaborators ("suppliers") of Línea Directa Aseguradora and any of its subsidiaries, as well as the Línea Directa Foundation ("LINEA DIRECTA").

LINEA DIRECTA is aware of the importance of its supply chain for the fulfilment of its goals, and therefore this Code establishes the principles by which all suppliers with whom it carries out commercial operations or provides services must abide in terms of ethical, social and environmental conduct, and which are consistent with the ten principles of the United Nations Global Compact.

The Supplier Code of Conduct implements, in the area of supplier relations, the principles set out in the Code of Ethics of the Línea Directa Group and in other documents, such as the Sustainability or Human Rights policies, in which LINEA DIRECTA undertakes to apply the principles of responsibility and sustainability in the management of the supply chain.

2. Adherence to and compliance with the Code

As a general rule, LINEA DIRECTA will only hire suppliers that are committed to complying with the principles set out in this Code of Conduct, which will be applied according to a criterion of proportionality, taking into account the size of the company, as well as the nature of the services they provide or will provide to LINEA DIRECTA.

Suppliers must expressly accept the principles and values contained in this Code of Conduct prior to the provision of the service or exercise of the

commercial activity for which they are hired, as well as establish and maintain the necessary management systems to adapt their behaviour to these principles. It is therefore the responsibility of all of our suppliers to comply with and promote compliance with the Code, as well as to apply the Code to their value chain.

LINEA DIRECTA retains the right to request from the supplier the policies, procedures or any other document that accredits compliance with this Code of Conduct, always under the abovementioned principle of proportionality.

LINEA DIRECTA has provided a communication channel to answer questions or questions that may arise about the application of the Supplier Code of Conduct so that interested parties may always know what behaviours are aligned with this Code, as well as to report any irregularities detected in compliance with it. Any person, whether a supplier or not, can access the ethical channel through the link provided on the corporate website.

3. Principles of action

LINEA DIRECTA suppliers agree to:

1. Respect this code of conduct for as long as they maintain their status as a LINEA DIRECTA supplier.
2. Collaborate with LINEA DIRECTA in the investigations and audits carried out in this regard by providing complete and truthful information.
3. Implement corrective actions, if necessary, when irregularities are detected.

4. Provide LINEA DIRECTA with any information they consider relevant to the requirements set out in this Code.

This Code is governed by the following principles:

1. Ethics and transparency.
2. Legal compliance and respect for competition.
3. Confidential Information and Intellectual property.
4. Respect for people.
5. Respect for the environment.

4. Ethics and transparency

The Línea Directa Group grounds its commercial relations with its suppliers on the principles set out in its Code of Ethics and on respect for applicable legislation, while respecting the interests of both parties, making possible the highest levels of quality and expertise in the services provided. The content of this Code is complementary to the legal obligations of the supplier as set out in the contract or in the applicable regulations.

All actions must be carried out in compliance with and enforce compliance with applicable laws and regulations, in accordance with the Principles of the United Nations Global Compact.

LINEA DIRECTA will only consider offers from suppliers who comply with their legal obligations, have an impeccable track record and carry out their activities in a socially responsible manner. LINEA DIRECTA chooses suppliers who share its ethical values and have a strong reputation for fairness and integrity in their business dealings.

The tendering, awarding and purchasing processes will be carried out in accordance with the principle of transparency, ensuring the participation of a sufficient number of companies to guarantee the variety of the offer and adequate competitiveness, offering to both potential suppliers and those currently working with LINEA DIRECTA the same opportunities to present their offers.

All suppliers who are also customers of LINEA DIRECTA will not receive any preferential treatment due to their customer status. In addition, if a supplier has any personal, economic or family relationship with LINEA DIRECTA or any of its employees, they must make this known, and this circumstance will not be a reason for preferential treatment with respect to other suppliers.

No supplier will enter into a commercial, labour, financial or any other type of relationship with LINEA DIRECTA employees that could represent a conflict of interest for the company. The selection of suppliers will be made on the basis of objective criteria, avoiding any type of interference that could harm the interests of LINEA DIRECTA.

The suppliers of LINEA DIRECTA agree to take the utmost care to preserve the image and reputation of Línea Directa Aseguradora and its subsidiaries in their activities by using it appropriately and correctly, both on the part of their employees and in the case of subcontracted companies.

5. Legal compliance and respect for competition

Suppliers must comply with the applicable legislation of the countries in which they operate, avoiding any conduct that, even without violating the law, could damage the reputation and image of LINEA DIRECTA and produce adverse consequences for the company or its environment.

LINEA DIRECTA has a "zero tolerance" policy on corruption, bribery and money laundering involving criminal or illicit activities. Suppliers shall not engage in or tolerate, in their scope of activity, any form of corruption, nor offering or accepting bribes or other illegal inducements.

LINEA DIRECTA will not accept gifts or courtesies to its employees that may influence the decision-making process relating to the performance of their duties.

Suppliers will respect the legislation in force in the conduct of their business, and their behaviour towards other companies in their sector will be in accordance with the applicable antitrust legislation.

6. Confidential information and intellectual property

Suppliers will protect confidential information and make only appropriate use of it, ensuring that the privacy of information relating to employees, customers and business partners is safeguarded, and respecting intellectual property rights and contractual commitments made in this regard.

Suppliers will sign confidentiality agreements, whereby they undertake to keep all information provided to them under professional secrecy.

7. Respect for people

7.1 Labour legislation

Suppliers must guarantee respect for the human rights of their employees by providing working conditions that ensure respect for the safety, health and

well-being of their employees, taking into account local, national and international standards and in accordance with the specific hazards/risks of each activity.

In addition, suppliers will implement occupational risk prevention programmes to prevent injuries and accidents related to or occurring in the course of work by minimising the causes of hazards inherent in the performance of work and the working environment.

7.2 Human rights

LINEA DIRECTA, by virtue of its commitment to the United Nations Global Compact, expects its suppliers to work to support and respect the protection of human rights in accordance with the United Nations Universal Declaration of Human Rights, the core Conventions of the International Labour Organisation (ILO) and the United Nations Guiding Principles on Business and Human Rights. This means that suppliers shall:

- Prohibit forced or compulsory labour and promote treatment of their employees that respects existing labour standards. This includes the prohibition of any trafficking of human beings.
- Ensure the absence of child labour.
- Allocate a living wage sufficient to meet the basic needs of their employees and ensure compliance with the regulations in force in the countries where they operate.
- Ensure that working hours are not excessive and that maximum working hours comply with national legislation.
- Respect the freedom of association of their employees.

The supplier must have the necessary mechanisms to guarantee that nowhere in its supply chain, or in its own business, is slave labour or human trafficking taking place.

At LINEA DIRECTA's request, suppliers will report on the measures they have taken to ensure that their operations and supply chain are free from slavery and human trafficking, as well as the development and advancement of such measures.

7.3 Diversity, inclusion and non-discrimination

The supplier must be committed to treating all employees fairly and not discriminating on the basis of race, sex, age, language, religion, disability, sexual orientation, opinion, origin, economic status, birth, trade union membership or any other personal or social status or circumstance.

The supplier will promote diversity and equal opportunities through measures that foster work-life balance and the integration of groups at risk of exclusion, guaranteeing equal opportunities among its employees.

8. Respect for the environment

8.1 Environmental legislation

LINEA DIRECTA is strongly committed to environmental protection and the transition to a low-carbon economy and actively works to minimise the environmental impact of its value chain. The supplier, therefore, must at all

times act in compliance with international, national or local environmental legislation, especially with regard to emissions, energy, waste, recycling and resource consumption.

8.2 Environmental policy and management

Depending on the services to be provided and the size of the supplier, LINEA DIRECTA may require the supplier to have a documented and updated environmental policy that includes a commitment to environmental protection, biodiversity, compliance with applicable laws and continuous improvement.

The supplier must, as far as possible, have a documented management system in place to ensure effective planning, action and control of the most relevant environmental aspects of its activity.

8.3 Climate change

LINEA DIRECTA may request that suppliers take measures to minimise the impact that their activity has on climate change, considering in this analysis the entire value chain (scopes 1, 2 and 3 of their greenhouse gas emissions).

Where possible, suppliers will work to reduce their greenhouse gas emissions by defining reduction targets.

Suppliers must provide LINEA DIRECTA, upon request, with information on greenhouse gas emissions and energy consumption corresponding to the products and services they provide to LINEA DIRECTA.

9. Approval and implementation

This Code has been approved by the Board of Directors at its meeting held on 26 January 2023 and is effective from the moment of its approval.

The content of this document will be updated and revised when necessary, following the same procedure as when it was drawn up, and the latest approved version will be available on the corporate website (www.lineadirectaaseguradora.com).

This Code of Conduct formalises the application, in the area of relations with suppliers, of the principles set out in the Code of Ethics of the Línea Directa Group. Any question regarding its interpretation will be resolved taking into account the content of this Code and through the channel provided for this purpose.