



# Code of Ethics for Suppliers and Collaborators

**Criminal Risk Prevention System**

July 2022

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# 1. Introduction and scope of application

Mutua Madrileña's strategy is based on ethical and responsible management of our business, seeking profitable growth anchored in diversification, process excellence and talent management. The ultimate aim is to create value for all our stakeholders.

- We apply the **highest principles of good governance and transparency**.
- We maintain a **sound financial structure** and carry out **strict risk control**, enabling us to meet our commitments.
- We pursue **excellence in our processes** to offer customers the best service and respond to their needs with the highest quality.
- We use **innovation and digitisation** to leverage business development and process improvement.
- We foster **talent development and caring about people**, as we are aware that our employees are our greatest asset.
- We maintain **a climate of trust with our stakeholders**, based on dialogue and mutual commitment.
- Our **responsible management** additionally includes the **management and control of our environmental impact** by implementing standardised systems, and we also encourage **reduction of our resource consumption and sustainable mobility**.
- Our commitment also extends to society in general. This commitment is put into practice by the **Mutua Madrileña Foundation**, whose work focuses on **health research, social action in different areas, promoting culture and aiding road safety**.

Mutua Madrileña is committed to the United Nations Sustainable Development Goals and its priorities and work are aligned with the Agenda 2030.

Also, as part of its commitment to the Global Compact, the company has established a series of basic lines of action for its suppliers with regard to anti-corruption measures, human and labour rights and the environment.

Mutua Madrileña uses this Code to convey a message of total rejection of unethical conduct or the commission of any type of legal or administrative infringement or criminal offence.

Consequently, Mutua Madrileña and its group companies require all their suppliers and collaborators to assume and fulfil the strictest principles of responsibility, transparency and business ethics. Our company has a zero tolerance policy for legal infringement or for advantages of any type being obtained through unfair or illegal practices.

This code of ethics is aimed at our company's suppliers and collaborators with whom we have a business or professional relationship of any kind (hereinafter referred to as suppliers), and it will be published both on our company website and in all our supplier contact tools. This Code should be considered a summary of the main ethical aspects that will govern activity with our suppliers, without prejudice to any other standards and commitments that each supplier must apply in accordance with the applicable laws or to the contractual arrangements governing their relationship with our company. If any term in a contract or agreement is stricter than its equivalent in this Code, the former will prevail.

All the suppliers and collaborators worked with must comply with the principles and guidelines for action described in this Code of Ethics for Suppliers and Collaborators.

## 2. Commitments and principles of action

Mutua Madrileña has established a series of principles and values to be considered basic aspects of conduct or behaviour, which our company expects to be fulfilled by all persons and entities who have a business relationship with us.

- **Knowing, respecting and complying with the legal framework** for our suppliers' work and their responsibilities and obligations.
- **Acting honestly, honourably and with professional integrity.**
- Treating people **politely and respectfully.**
- **Acting in good faith** and not committing wilful misconduct against the company's interests or public image or those of its employees and customers.
- **Avoiding any conflicts of interest** that may arise in any relationship with Mutua Madrileña.
- **Support and respect for the protection of basic human rights and labour rights.**
- **Transparency in relationships with third parties.**





- **Abstaining from carrying out any transactions and using any financial products or instruments that would entail non-compliance with tax laws or accounting standards.**
- **Involvement and proactive presence** in the Communities in which they carry out their business activity.

- Our company has a **Criminal Risk Prevention Policy, which is** available on its website:

<https://www.grupomutua.es/informacion-corporativa/transparencia-etica/>



together with **ethical standards** for its employees, **anti-corruption regulations** and other standards guaranteeing that the **ethical principles we require of third parties with a business relationship with us** can be totally assumed in the first person by our company.

- Under no circumstances may any third party that has a relationship with us avail itself of a request or order made to it by an employee or administrator of our company, or by any third party presumably acting on our behalf, to perform any type of action or omission directly or indirectly infringing the **ethical provisions contained in this document**. If this type of situation should occur they must abstain from carrying out the said action or omission and inform of it immediately via the reporting channel.

## 2.1. Integrity and ethics. Anti-corruption and anti-bribery measures

Our suppliers must act in accordance with the principle of integrity at all times in all their business relationships, ensuring they safeguard our company's image and reputation in all their professional activities.

Our company will not permit corruption of any kind and its suppliers are expected not to practice or consent to any form of corruption, bribery, malfeasance or extortion on conducting business, under any circumstances.

Suppliers must not accept or offer any kind of gift or personal benefit to any person connected with our company that goes beyond normal business practice or courtesy (work opportunities, special discounts, preferential treatment, travel or any item of value). We also expect our suppliers not to use this type of procedure for carrying on any kind of legal business for our company.

Conduct with public officials must involve the maximum respect for the institution they represent. We therefore do not consent to improper conduct within any relationships with public officials, including those maintained by suppliers representing our company.

## 2.2. Human and labour rights

We expect our suppliers to strictly respect human and labour rights and to comply with all local or national labour regulations that apply to them in the countries in which they operate, produce goods or conduct their business.

The workers' dignity, privacy, safety and all other rights must be respected.

**By way of example but without limitation, they must:**

- **Abstain from using child labour** and comply at all times with the standards set by the International Labour Organisation.
- **Respect and foster work-life conciliation.** They must respect the employees' personal lives, seeking mechanisms to allow them achieve a balance between both spheres.
- **Respect the basic principles of equal opportunities, non-discrimination and consideration of diversity and inclusion, in all their variations.**
- **Foster the integration of disabled people.**
- **Have mechanisms to prevent any engagement in physical or psychological harassment, aggression or any other harassment situation** that could imply a violation of their workers' rights.
- **Recognise freedom of association, trade union rights and the right to collective bargaining,** in accordance with the applicable legislation in the country in which they operate.
- **Suppliers must adopt the necessary measures within their organisation to eliminate all forms of forced or compulsory labour.**

Our suppliers must not tolerate direct or indirect discrimination of any kind for reasons of race, ideology, religion, creed, nationality, language, gender, sexual orientation, disability, age, status as the workers' legal or union representative or for any other reason, under any circumstances.

### 2.3. Health and safety

Mutua Madrileña has implemented and certified an Occupational Health and Safety Management System based on the international ISO 45001 standard. Our suppliers must comply with all the obligations deriving from the occupational health and safety regulations and any requirements notified deriving from the management system.

They must encourage safe, healthy workplaces, proceeding as necessary to reduce the workers' risk of accident, injury and exposure. This also applies to construction sites.

They must identify and assess potential workplace emergency situations and minimise their possible impact by implementing emergency response plans and procedures.

They must provide safety information on the known risks in the workplace, and the suppliers' employees must receive the corresponding training and the necessary resources for carrying out their work to ensure that they are suitably protected, together with the corresponding health monitoring and control.

The suppliers will be held liable for any damages attributable to them by action or omission, particularly those resulting from their failure to adopt the relevant preventive health and safety measures to prevent them from occurring.

### 2.4. The environment

All entities that have a relationship with our company must act responsibly towards their environment, complying with all the environmental legislation and all the obligations applicable to them in accordance with their business.

**Therefore, by way of example and without limitation, they must:**

- **Encourage initiatives fostering greater environmental responsibility and development of environment-friendly practices and technology systems.**
- **Contemplate the derived opportunities and significant risks from an **environmental perspective on conducting their business, minimising their direct negative impact on the environment.****
- **Foster the rational use of energy and the efficient use of basic resources, maintaining a preventive approach that will reduce the environmental impact of their activities and safeguard natural resources.**





- **Identify and manage any substances or other materials that may pose a hazard on being released into the environment** as a result of their activity, in order to guarantee their handling, transportation, storage, recycling or reuse and disposal under safe conditions and in accordance with the applicable legislation.

## 2.5. Data security and protection

Our suppliers must have suitable mechanisms in place with regard to the security of any data they may know or manage on carrying out their work for our organisation. They must guarantee that the information supplied by our organisation and/or known to them during the business relationship may not be disclosed or transferred to any third parties, given its confidential nature, unless such disclosure or transfer has been expressly authorised in writing.

Our collaborators must also rigorously comply with all the obligations deriving from Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on Protection of Personal Data of Natural Persons (GDPR) and in the Spanish data protection regulations applicable at any given time. For these purposes, they must comply with the relevant obligations included in the contracts they maintain with our organisation.

When applicable, the suppliers must have business continuity plans and technology contingency plans guaranteeing continuity of the services offered.

## 2.6. Quality of service

Mutua Madrileña is committed to providing distinctive services, and it works to improve quality and the customer experience. We expect our suppliers to guarantee the utmost quality of all the services offered, complying with the quality and safety standards and guidelines required by the applicable laws or regulations.

## 2.7. Intellectual and industrial property

All third parties that have a relationship with our company must respect all the intellectual and industrial property regulations in their relations with us. We will not permit the use of any tools or information that do not comply with or hold the licences required by the regulations applicable in each case.



### 3. Supplier responsibility

We ask our suppliers to pay particular attention to preventing and combating any conduct that could give rise to any kind of administrative and/or criminal liability for our company.

The supplier must have a control and detection system to prevent commission of any acts that may be considered criminal offences. It is important for them to encourage monitoring and control with regard to activities such as money laundering, terrorist financing, fraud or embezzlement.

The suppliers' control systems must be adjusted to and aligned with the **principle of proportionality**, and on requiring them the size, internal organisation, nature, scale and complexity of the business conducted by the suppliers who provide their services must therefore be taken into account.

If the service provided by the supplier is carried out via sub-contractors, it must be ensured that the sub-contractors also comply with ethical commitments comparable to those described herein.

The suppliers must conduct internal monitoring of the compliance with this Code and must proactively notify Mutua Madrileña of any non-compliance with it or any legal infringement, via the reporting channel.

(<https://www.grupomutua.es/informacion-corporativa/transparencia-etica/>).

The suppliers may also use this channel to make consultations regarding any practices or conducts that may be contrary to this Code of Ethics or the current legislation.

### 4. Knowledge, alignment and compliance with the Code

This Code will be published on both our company website (<https://www.grupomutua.es/informacion-corporativa/transparencia-etica/>) and in our main supplier contact tools. Any changes affecting our company's stance with regard to the aforementioned principles will be notified on our public website.

All Mutua Madrileña's suppliers must be in conformity with this Code, which seeks to ensure that the conduct of all persons linked to our company corresponds to the principles of ethical conduct we advocate.

Likewise, it will be understood that if it is verified at any time and by any means recognised by law that the supplier does not strictly comply with the terms of this clause, the business relationship may be modified, being reviewed or terminated depending on the specific case in question.

Mutua Madrileña reserves the right to audit its suppliers or ask them for proof of their effective compliance with the provisions of this Code.

