

Corporate Purchasing Policy





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1. Purpose

This Corporate Purchasing Policy (‘the Policy’) is an integral part of the Sener Group Compliance System and establishes the principles, criteria and procedures governing the acquisition of goods and services in all projects undertaken by Sener. These include engineering services and turnkey projects, ensuring transparency, equal opportunity, operational efficiency, sustainability¹ and alignment with corporate strategic objectives.

The Policy also serves as a call for exemplary behaviour from all Sener Group People, especially those involved in decision-making, leadership, supervision or team coordination, promoting ethical, objective and equitable purchasing practices.

2. Scope of application

This Policy is directly and mandatorily applicable to all Sener Group companies and all its people, who will be referred to collectively as Sener, the Sener Group or Group.

Sener Group companies include all subsidiaries, including international subsidiaries, and companies which Sener directly or indirectly controls as of this date or in the future,² and individually, the reference to Sener Group people includes all members of the Sener Group’s management bodies and its directors, employees and personnel regarded as such, irrespective of their contractual arrangement, geographical location or hierarchical level.

Sener will encourage in general terms the adoption of principles and values equivalent to those established in this Policy among the third parties with which it operates, and in particular with suppliers, subcontractors and collaborating companies.

Likewise, Sener will foster the alignment of its internal procedures with the basic principles set out in this Policy, as well as with the procedures applied in other related companies that are not part of the Group, such as minority-owned companies, joint ventures and temporary joint ventures.

¹ See Corporate Sustainability Policy and Corporate Sustainable Procurement Policy on the Sener Group’s corporate website.

² The term control refers to the situation in which a company directly or indirectly holds the majority of the voting rights of another company, the power to appoint or remove the majority of the members of its management body or can hold the majority of the voting rights by virtue of agreements with third parties, in such a way so that it effectively controls the management of said company.

3. Principles of conduct

The Sener Group establishes the following fundamental principles of action in relation to purchasing:

1. **Transparency and fairness:** all suppliers will be evaluated according to objective, impartial criteria, without discrimination and promoting equal opportunities, always ensuring compliance with Sener's Code of Conduct³, avoiding favouritism and conflicts of interest, and ensuring that they complete the approval process established at Sener.
2. **Cost optimisation:** the basic criteria for selection will be those suppliers with the best technical capacity for the purchase requirement and who offer the best economic conditions; this should not be an obstacle to ensuring the best total value of the operation - not just price - through negotiations, analysis of the total cost of ownership and possible economies of scale.
3. **Balance in decision-making:** in line with the previous principle, the different vectors of interest in Sener's purchase⁴ and subcontracting must be safeguarded and combined, considering technical aspects, supplier risks, price, but also quality, accessibility or proximity, delivery times, safety, labour and environmental aspects, and others such as cybersecurity risks and supplier sustainability⁵.
4. **Occupational health and safety:** promoting the highest standards of occupational health and safety and well-being for professionals⁶ involved in the value chain, especially those of suppliers, raising awareness and establishing the necessary controls to mitigate the risks inherent in the work carried out, in accordance with the policy and procedures defined by the group's Health, Safety and Environment Department. To this end, contractors will be required to comply with the established safety standards and the preventive culture implemented within the Sener Group, adopting international best practices in this area.
5. **Regulatory compliance:** in addition to the contractual conditions, all our suppliers must comply with the legislation in force in the jurisdictions in which they operate, sector regulations, corporate policies and internal procedures (including supplier approval, participation in competitive and transparent processes, financial and technical guarantees, etc.) as detailed in the procedures published by the respective Purchasing and Subcontracting departments of the group.
6. **Sustainability and social responsibility:** the hiring of suppliers with ESG or environmental⁷ certifications, ethical labour practices and social commitment will be encouraged.
7. **General purchasing conditions:** all contracts signed with suppliers and subcontractors shall comply with the clauses set forth (renewal, cancellation, LOPD, confidentiality, ethics, anti-corruption, etc.) that are developed in our general contracting conditions.

³ See the Sener Group Code of Conduct on the Sener Group corporate website.

⁴ As detailed in the procedures of the respective Purchasing and Subcontracting departments within the group.

⁵ See the Corporate Sustainable Procurement Policy on the Sener Group's corporate website.

⁶ In accordance with the Corporate HSE (Health, Safety and Environment) Policy.

⁷ See the Sener Group's Sustainable Procurement Policy on the Sener Group's corporate website.

4. Control and monitoring

All purchases and subcontracting carried out within the framework of the operations of the projects executed by Sener must be duly documented and recorded in the corporate ERP and other support systems. All awards made must generate the documentation required in internal procedures in order to ensure complete traceability, facilitate verification tasks for the Internal Audit department and streamline the supervision of controls by the Compliance department.

KPIs will be used to evaluate procurement management and the achievement of established objectives, without prejudice to periodic audits being carried out.

5. Risk management

Risks associated with single suppliers, urgent purchases, supplier financial solvency and liquidity, exchange rate fluctuations, regulatory changes, and third-party screening prior to signing a purchase order as defined in corporate procedures will be identified and mitigated. Supplier diversification and advance planning for critical purchases will be promoted.

6. Governance

6.1 Integration with the Compliance System

This Corporate Compliance Policy is an integral part of the Sener Group's Compliance System⁸, and it represents the principles established in the Code of Conduct, complementing the policies integrating it and the internal procedures developing them.

Reference in this document to the Sener Group's Code of Conduct⁹ also extends to complementary and/or developing policies and procedures that can be inferred from its context.

6.2 Duty to report

Notwithstanding the particularities of the reporting duties set forth in this Policy, all people at the Sener Group must report in good faith the existence or, when there is a reasonable indication, the possible existence of any breach of, conduct contrary to or violation of the principles and criteria of conduct established in the Compliance System, and in particular in this Policy.

This reporting of events, which may be made anonymously, must be performed in accordance with the procedures and channels established for this purpose in our Compliance System, through which inquiries may also be made regarding the matters it covers and its application.

⁸ View on the Sener Group's corporate website.

⁹ View the Sener Group's Code of Conduct on the Sener Group's corporate website

To that end, Sener Group companies have an Internal Reporting System known as the Ethics Hotline¹⁰. This channel guarantees, in all communications, the protection of confidentiality, anonymity and an anti-retaliation policy for whistleblowers and those reported. The Ethics Hotline¹¹ will be accessible from the corporate website and from the Sener Group's Intranet –Compliance area– on a 24/7 basis.

A Compliance Officer has also been appointed in each Sener Group company, to whom communications or inquiries may be made directly.

The Compliance Officer will be responsible for processing communications, reports and/or inquiries received. They will give priority to communications and/or inquiries related to the infringement or violation of internal anti-corruption policies and procedures and will always meet the legal deadlines to acknowledge receipt, analyse, investigate and resolve the reported situations. Subsequently, the Compliance Officer will be responsible for carrying out the appropriate actions and verifications in accordance with the internally defined procedure when it comes to responding to the reported events.

6.3 Knowledge, dissemination and training

All people at the Sener Group must be aware of, understand and comply with the Compliance System, and in particular this Policy, as well as actively participate in the training programmes and established monitoring mechanisms.

According to their geographical location, position and/or functions they perform, the people must be aware of, understand and comply with the regulations applicable in the jurisdictions where the Sener Group companies operate. The Compliance System, and specifically this Policy, is a minimum standard. Consequently, it will be applied without prejudice to any applicable laws. In order to avoid any doubt, adherence to the provisions of the Compliance System will in no case excuse compliance with the law.

This Policy, together with the remaining documents that make up the Sener Group's Compliance System, will be published on the Sener Group's corporate website and on its Intranet.

The Compliance area will be ultimately responsible for guaranteeing the proper dissemination of this Policy and the Compliance System, ensuring that they are communicated internally to all the people and externally to the various stakeholders.

Notwithstanding the foregoing, the people that perform management, supervisory or team coordination functions hold a greater responsibility in promoting a culture of compliance and serving as an example in the application of the Compliance System, ensuring that the people under their supervision receive the required training and guidance.

¹⁰ In accordance with Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law; and Law 2/2023 of 20 February 2023 regulating the protection of persons reporting regulatory infringements and the fight against corruption.

¹¹ See the Sener Group's Ethics Hotline Regulations. The Ethics Hotline can be accessed through the Ethics Hotline Form via the corporate website's home page and the Sener Group's intranet (<https://www.group.sener/en/about-us/sustainability/corporate-governance/compliance/ethics-reporting-form/>).

6.4 Supervision and penalty system

The ultimate responsibility for supervision and compliance¹² of this Policy lies with the management body of each Sener Group company, which delegates its supervision to the Compliance Officer appointed for this purpose. This responsibility will require special diligence in the international subsidiaries through which the Sener Group operates in other countries.

The breach of conduct contrary to or violation of the principles and criteria of conduct established in the Compliance System, and in particular in this Policy, may lead to the adoption of the corresponding disciplinary measures and penalties according to the applicable disciplinary system. This will be without prejudice to the adoption of other measures or the enforcement of any responsibilities that may correspond to the offender.

Sener commits to taking the appropriate measures in the event of any irregular or potentially criminal conduct that may occur in its operations. It will adopt the appropriate measures and, where appropriate, report it to the competent authorities and initiate any relevant legal action.

7. Review and update

The Sener Group's Compliance area will regularly review the content of this Policy, ensuring that it contains the international best practices, recommendations and legislation in force at any given time. It will propose amendments and updates that contribute to its development and continuous improvement.

The Board of Directors of Sener Grupo de Ingeniería, S.A. has the ultimate authority to approve the corporate codes and policies at Group level. These contain the guidelines that govern the actions of all Sener Group companies in the implementation of the Code of Conduct and in line with its corporate governance principles.

This Policy was approved by the Board of Directors of Sener Grupo de Ingeniería, S.A. on 18 December 2025.

¹² View the Sener Group's Corporate Compliance Policy on the Sener Group's corporate website.



www.group.sener