

RESPONSIBLE SOURCING AND SUPPLIER SELECTION POLICY

HORSAN BROKERS COMPANY SL

Registered Office: Calle Campoamor, 28 - Piso 1, Castellón de la Plana, Spain

Version 1.0 | Effective Date: 20 April 2026 | Approved by: Board of Directors

1. Purpose

HORSAN BROKERS COMPANY SL recognises that its impact on the environment, society and human rights extends beyond its own operations to those of its suppliers and business partners. This Policy establishes the Company's commitment to responsible sourcing and sets out the criteria and procedures for the selection, engagement, monitoring and management of suppliers.

2. Scope

This Policy applies to all suppliers of goods and services to the Company, worldwide, and to all employees and business units involved in sourcing decisions.

3. Our Commitment

The Company is committed to:

- Sourcing responsibly, in accordance with applicable law and internationally recognised standards.
- Promoting among its suppliers respect for human rights, labour standards, health and safety, environmental protection and business ethics.
- Building long-term relationships based on mutual trust, transparency and shared values.
- Progressively improving the sustainability profile of its supply chain.

The Company aligns its approach with:

- The ten principles of the United Nations Global Compact (UNGC) in the areas of human rights, labour, environment and anti-corruption.
- The United Nations Guiding Principles on Business and Human Rights (UNGPs).
- The Core Conventions of the International Labour Organization (ILO).
- The OECD Guidelines for Multinational Enterprises.

4. Supplier Selection Criteria

Suppliers are selected on the basis of objective criteria, including:

- Quality, reliability and competitiveness of products and services.
- Financial soundness.
- Regulatory compliance and absence of material sanctions.
- Ethical conduct and absence of material adverse findings.
- Compliance with environmental, health, safety, labour, human rights and anti-corruption standards.
- Transparent ownership structure.
- Geographic fit with the Company's operations and risk profile.

5. Supplier Code of Conduct

Suppliers are required to comply with, or to demonstrate equivalent standards to, the Company's Supplier Code of Conduct, which covers:

5.1 Business Ethics

- Compliance with all applicable laws, including anti-corruption, competition, tax and trade sanctions.
- Prohibition of bribery, kickbacks and facilitation payments.
- Avoidance of conflicts of interest.
- Accurate and transparent record-keeping.

5.2 Human Rights and Labour

- Prohibition of child labour, forced labour and human trafficking.
- Freedom of association and the right to collective bargaining.
- Non-discrimination and equal opportunity.
- Working hours and wages compliant with applicable law.
- Safe and healthy working conditions.

5.3 Environment

- Compliance with applicable environmental laws and permits.
- Minimisation of emissions, waste and environmental impact.
- Responsible use of natural resources and energy.
- Prevention of pollution and spills.

5.4 Communities

- Respect for the rights of local communities and indigenous peoples.
- Constructive engagement with stakeholders.

6. Due Diligence

Prior to engagement, suppliers undergo due diligence proportionate to their risk profile, including:

- KYC identification (legal entity, UBO, directors).
- Sanctions, PEP and adverse media screening.

- Assessment of country, sector and operational risk.
- Review of material compliance issues (environmental fines, labour disputes, corruption allegations).

Where available, the Company relies on credible third-party assessments and certifications (e.g. ISO 9001, ISO 14001, ISO 45001, OHSAS 18001, SA8000, or equivalent industry-specific standards) as indicators of supplier performance. The Company is progressively developing its own internal scoring mechanism to assess supplier sustainability performance.

7. Contractual Requirements

Supplier contracts include:

- Representations of compliance with applicable law and the Supplier Code of Conduct.
- Anti-bribery, anti-money laundering and sanctions compliance clauses.
- Confidentiality and data-protection obligations.
- Right of audit.
- Right of termination in the event of breach.

8. High-Risk Sourcing Jurisdictions

The Company exercises particular caution when sourcing from, or operating in, jurisdictions considered high risk from a sustainability, corruption or human-rights perspective. High-risk jurisdictions are identified using recognised sources, including:

- FATF lists of high-risk and monitored jurisdictions.
- EU list of non-cooperative jurisdictions for tax purposes.
- Transparency International Corruption Perceptions Index.
- World Bank Governance Indicators.
- Applicable sanctions regimes.

Sourcing from such jurisdictions requires enhanced due diligence and senior-management approval, as further detailed in the Company's High-Risk Jurisdictions Policy.

9. Monitoring and Audit

- Suppliers are subject to periodic review based on their risk classification.
- Performance may be assessed through self-assessment questionnaires, documentary review and — where proportionate — on-site audits.
- Identified issues trigger a corrective action plan with defined milestones.
- Repeated or serious breaches result in termination of the relationship.

10. Reporting Concerns

Suppliers, their employees and other stakeholders may report concerns about the Company's supply chain through the Company's Whistleblowing channel. The Company does not tolerate retaliation against anyone who reports a concern in good faith.

11. Responsibilities

- **Board of Directors:** ultimate oversight and approval of sourcing from high-risk jurisdictions.
- **Compliance Officer:** oversight of supplier due diligence, risk classification and issue escalation.
- **Commercial / Procurement team:** primary relationship management and application of this Policy.
- **All employees:** compliance with this Policy and escalation of concerns.

12. Continuous Improvement

The Company is committed to progressively strengthening its responsible sourcing programme, including by:

- Developing a formalised supplier scoring mechanism.
- Expanding the collection of sustainability KPIs from suppliers.
- Pursuing, over time, recognised certifications and voluntary commitments.

13. Review

This Policy is reviewed at least every two years and updated in light of operational, regulatory and stakeholder developments.

Approval and Sign-Off

This Policy has been reviewed, approved and adopted by the Board of Directors of HORSAN BROKERS COMPANY SL and is effective as of 20 April 2026.

Javier Sánchez

Chief Executive Officer / Administrador Único

HORSAN BROKERS COMPANY SL

Date: 20 April 2026