



RESPONSIBLE CONTRACTORS POLICY

SUMMARY SHEET AND CHANGE CONTROL

TITLE	RESPONSIBLE CONTRACTORS POLICY	
DESCRIPTION	The purpose of this Policy is to guide Valoriza professionals in the selection of independent contractors and subcontractors that provide goods, services, or works.	
SCOPE	All entities belonging to Valoriza, taking into account their own characteristics, including subsidiaries or majority-owned companies in which Valoriza exercises effective control. Members of the administrative and executive bodies, as well as employees of all the above-mentioned Valoriza entities. Third parties, both individuals and legal entities, related to Valoriza, to the extent applicable to them under this Policy.	
AFFECTED DEPARTMENTS	Bidding and Procurement Any department that makes decisions regarding the hiring of suppliers.	
AUTHOR	Regulatory Compliance Unit	
RESPONSIBLE PARTIES	RESPONSIBLE	FUNCTIONS
	Regulatory Compliance Unit	Distribution and monitoring of policy implementation.
	Other departments	Ensure compliance with sections 3 and 4 established in this Policy.
APPROVED BY	Board of Directors	

Edition	Date	Responsible Party	Description of Changes	Approved by
V1	28/05/25	Regulatory Compliance Unit	Initial Draft	Board of Directors

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RESPONSIBLE CONTRACTORS POLICY

The Board of Directors of Valoriza Servicios Medioambientales, S.A. (hereinafter "**Valoriza**"), within its general and non-delegable competence to determine general policies and strategies, has approved this Responsible Contractors Policy (hereinafter, the "**Policy**").

This Policy is part of the "Regulatory Compliance, Criminal Prevention, Anti-Corruption, and Competition Defense Model of Valoriza" (hereinafter, the "**Regulatory Compliance Model**").

The Code of Ethics of Valoriza is the internal norm that constitutes the foundation of this Regulatory Compliance Model. This Policy aligns with the values of integrity and transparency promoted in this Code of Ethics and serves as the development of several of its behavioral guidelines, particularly those related to anti-corruption measures and relationships with third parties.

Consequently, this Policy must be read and interpreted jointly with the Code of Ethics and other policies that develop it, including, among others, the Regulatory Compliance Policy in Crime Prevention, the Anti-Corruption and Relationship with Public Officials and Authorities Policy, the Donations and Sponsorships Policy, and the Gift and Hospitality Acceptance and Offering Policy. These policies reflect Valoriza's strong commitment to legal compliance, particularly in the areas of criminal and anti-corruption regulation.

1 Purpose

Valoriza strives to create value by leveraging its global network of relationships, identifying business opportunities, both independently and collaboratively. In close cooperation with Group companies, Valoriza focuses on implementing operational improvements and initiatives that drive sustainable value creation.

Given the public-private nature of many of Valoriza's initiatives, this Policy has been developed to guide professionals in selecting independent contractors and subcontractors that supply goods, services, or works.

Valoriza deeply cares about the working conditions of employees hired by Contractor Companies. In line with its values, Valoriza supports the development of small businesses, market competition, and operational cost control.

Valoriza firmly believes that a diverse, well-paid, and well-trained workforce, operating in a compliant environment -especially regarding labor safety and non-discrimination- delivers higher quality products and services. This approach not only strengthens the long-term security and stability of Valoriza's investments but also creates sustainable opportunities for growth and return on investment.

Through this Policy, Valoriza reaffirms its commitment to sustainability, economic development, and social well-being, ensuring that its investments positively contribute to the social and economic environment in which it operates.

2 Scope of Application

In this Policy, references to "Valoriza" or "the Company" include all entities covered within this scope.

This Policy applies to:

- All entities belong to Valoriza, considering their own characteristics. For the purposes of this document, the Valoriza Group includes all subsidiaries or majority-owned companies in which Valoriza exercises effective control, either directly or indirectly, including Temporary Joint Ventures (UTEs), regardless of their geographical location.

Other entities where Valoriza participates without having effective control will be encouraged to adopt behavioral and operational guidelines aligned with this Policy.

- Members of the administrative, executive, and employee bodies of all Valoriza entities listed above, regardless of their territory.
- Third parties, both individuals and legal entities, related to Valoriza in aspects of this Policy applicable to them and who are expected to act accordingly.
- All public or private tenders and bidding processes in which Valoriza participates.

For activities conducted by Valoriza outside Spain, this Policy must be adapted to comply with the most restrictive local legislation that may be applicable.

3 Contractor Selection Criteria

Valoriza will generally recommend hiring Contractors who can demonstrate compliance with the following responsible contracting criteria:

- a) Employer-Paid Safety Training.** Contractors must ensure that employees have the necessary skills and legally required certifications to perform assigned work safely. When applicable, contractors must provide health and safety training.
- b) Safe Working Conditions.** Contractors must maintain safe and healthy working conditions at all times. At a minimum, contractor working conditions must comply with the laws, regulations, and standards of the applicable jurisdiction.

- c) **Contractor Selection Process.** Contractors must use competitive bidding and selection processes when hiring subcontractors or other service providers to assist with contractor activities.
- d) **Compliance with Labor and Employment Laws.** Contractors must be committed to complying with all applicable local, state, and national labor laws and must not commit material violations. This includes, but is not limited to, insurance requirements, tax withholding, wages and overtime, labor discrimination, and union representation. Contractors must provide equal employment opportunities, free from discrimination and harassment based on any characteristic protected by law. They must also comply with applicable wages and hour regulations and prohibitions against child labor.
- e) **Market-Based Fair Wages and Benefits.** Contractors must pay their employees fair wages and benefits in accordance with current legislation and market standards, considering local practices related to the type of activity and project.
- f) **Compliance.** When selecting contractors, Valoriza will consider their experience, reputation for honesty, integrity, safety, and training history, as well as punctuality, reliability, fees, and consistent compliance with both the criteria established in this section and the applicable legal framework.

4 Contractor Administration and Management

Valoriza will implement the following measures regarding Contractor selection in relation to the Policy's implementation:

- a) **Due Diligence.** Valoriza will conduct the necessary due diligence to reasonably assess the Contractor's ability to meet the Contractor Selection Criteria established in the Policy.
- b) **Notification and Confirmation.** Valoriza will periodically communicate the Policy to its Contractors through the General Terms and Conditions of Orders, and Contractors must confirm their acceptance with each order.

5 Compliance Control and Actions in Case of Non-Compliance

The Business Unit proposing to engage a Third Party has the primary responsibility for overseeing the conduct of the Third Party by applying the controls established in this Policy.

The Board of Directors is responsible for overseeing the implementation and compliance of this Policy by all individuals and entities within its scope of application. It is supported by the Regulatory Compliance Unit of Valoriza, which exercises the necessary operational powers to ensure its effectiveness, monitoring its implementation, promoting its review, and driving the required

information, training, and awareness initiatives for its proper dissemination. Compliance with this Policy will also be subject to audit reviews.

Violations of this Policy will be subject to the disciplinary measures that Valoriza applies in accordance with its corporate governance system, collective agreements, and applicable legal regulations.

Anyone who detects a possible violation of this Policy must report it as soon as possible to the Regulatory Compliance Unit through the Ethics Channel, which serves as Valoriza's preferred reporting mechanism. This does not preclude the use of other legally recognized means of communication with the Regulatory Compliance Unit.

The Ethics Channel is also available for addressing any questions or concerns regarding this Policy. The Ethics Channel is available through:

- Intranet: via designated links.
- Company Website: www.valorizasm.com.

6 Approval and Entry into Force

This Responsible Contractors Policy was approved by the Board of Directors of VALORIZA SERVICIOS MEDIOAMBIENTALES, S.A. on May 28, 2025, and this is its first valid version.

Upon its entry into force, this Policy repeals any previous internal regulations on the subject. It will be disseminated through Valoriza's official communication channels and updated periodically to reflect regulatory changes, structural modifications, or governance system improvements. The latest version is available at www.valorizasm.com.

In the event of any discrepancy between this translated document and its original Spanish version, the Spanish version shall prevail.

