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POLICY ON SUSTAINABLE PROCUREMENT

Seppelec's Executive Management, with the aim of promoting responsible procurement management, is committed to working actively with its suppliers and subcontractors to minimise the environmental and social impacts arising from its supply chain. To this end, the following quantitative and qualitative objectives are established, which are consistent with the Sustainable Procurement Policy, which serves as the framework for their establishment and review:

Qualitative objectives

Environmental practices of suppliers and subcontractors

- We will integrate environmental and social criteria into the processes for assessing and monitoring the performance of suppliers and subcontractors, using these criteria to prioritise and maintain business relationships with suppliers and subcontractors that demonstrate strong performance in sustainability.
- We will extend training on environmental issues to engineering departments to improve their performance in relation to procurement.

Social practices of suppliers and subcontractors

- Preference will be given to working with suppliers and subcontractors who demonstrate responsible social practices, particularly in the following areas:
    - Providing a safe working environment through the implementation of appropriate protective measures, such as training programmes, health monitoring and the provision of personal protective equipment (PPE).
    - Offering fair and competitive pay, taking into account local labour market conditions.
    - Complying with applicable labour regulations regarding working hours and rest periods, as well as ensuring that child labour and forced labour are prohibited.
    - Promoting inclusion, equal opportunities and gender equality in the workplace.
- In order to reinforce our commitment to ethics and compliance within the supply chain, Seppelec provides its employees, suppliers, subcontractors and other stakeholders with a confidential communication channel to report any potential breaches of this policy.

Quantitative targets

Environmental practices of suppliers and subcontractors

- During 2026, assess at least 90 per cent of suppliers and subcontractors from whom cumulative purchases exceeding €10,000 have been made, or to whom at least five orders have been placed during the 2026 financial year, in terms of sustainability.
- During 2026, ensure that at least 50 per cent of suppliers and subcontractors to whom Seppelec has placed orders processed as purchase orders demonstrate environmental performance through the publication of sustainability reports, certification in accordance with the ISO 14001 environmental management standard, the ISO 50001 energy management system standard, or other similar standards.

Social practices of suppliers and subcontractors

- During 2026, assess at least 80 per cent of suppliers and subcontractors from whom purchases totalling more than €10,000 have been made, or to whom at least five orders have been placed during the 2026 financial year, in terms of sustainability.

- During 2026, ensure that at least 40 per cent of suppliers and subcontractors to whom Seppelec has placed orders managed as purchase orders demonstrate social performance through the publication of sustainability reports, certification in accordance with the ISO 45001 standard for occupational health and safety management systems, or other similar standards.

Validity and review

This Policy applies to all Seppelec production sites and to work carried out at the premises of customers, suppliers and subcontractors. It is reviewed annually to ensure it remains up to date; the Purchasing Department is responsible for its implementation and for the annual monitoring of the qualitative and quantitative objectives mentioned.

Transparency

Progress and results arising from this policy will be documented and reported in Seppelec's Sustainability Report, as part of our commitment to transparency and continuous improvement in the area of responsible procurement.

Furthermore, this sustainable procurement policy is available to all stakeholders on Seppelec's official website, ensuring its transparency and easy access.

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Signed: Sven Funke

Operations Officer

Alcorcón, 16 January 2026