

**TOUS®**



**TOUS GROUP CODE OF ETHICS  
FOR MANUFACTURERS AND  
SUPPLIERS**

## 1. INTRODUCTION

The TOUS Group Code of Ethics for manufacturers and suppliers sets out the minimum standards of ethical and responsible behavior that must be observed and respected by the manufacturers of products marketed by TOUS and suppliers of services that the TOUS Group (the “**Group**” or “**TOUS**”) procures in the performance of its activity, in accordance with the Compliance culture existing within the organization.

TOUS adopts high standards of conduct, as well as a position of zero tolerance of non-compliance with any regulations that may be applicable to the activity carried out by TOUS.

In line with the above, the TOUS Group promotes the following principles for action and requires its manufacturers and suppliers to respect them:

- **Respect for the legislation in force and obligations assumed:** acting in accordance with the applicable legislation in force, as well as complying with potential internationally recognized standards and fully respecting the commitments and obligations assumed in contractual relationships, as well as the customs and good practices in the locations where the activity is performed.  
In the event of doubt, the highest standard must be given priority and if there is any discrepancy between this Code of Ethics for manufacturers and suppliers and the legislation in force, the legislation will prevail.
- **Institutional transparency and integrity:** performing business ethically and with integrity in all areas of action. Therefore, TOUS manufacturers and suppliers must run their business in a way that is designed to achieve excellence and transparency, allowing them to generate a suitable framework of trust.
- **Social responsibility and sustainable development:** promoting the protection of human rights, business ethics and social and environmental responsibility.

Based on the above, the TOUS Group and its related companies require their manufacturers and suppliers to share this commitment to regulatory compliance, guaranteeing the real and effective application of these principles and the guidelines for action established below, in order to prevent any actions that could put the Group at risk.

TOUS undertakes to provide the necessary means so that its manufacturers and suppliers are aware of and understand this Code of Ethics for manufacturers and suppliers and can comply with it.

## 2. GENERAL ACTION GUIDELINES

### I. BAN ON CORRUPTION

Manufacturers and suppliers must not participate, directly or indirectly, either nationally or internationally, in corruption involving public authorities and/or officials, executives, employees or associates; including bribes, extortion, embezzlement and influence peddling, among others.

Manufacturers and suppliers must not breach or cause TOUS to breach any anti-corruption regulations or laws that may be applicable.

As a result, manufacturers and suppliers must base their relationships on the principles of transparency and equal opportunities, avoiding any action aimed at obtaining or offering an undue benefit or advantage, and always following the internal policies expressly defined for preventing, detecting and reacting to public and private corruption.

### II. TRANSPARENCY AND CONTROL OF OPERATIONS

Manufacturers and suppliers must comply with their tax obligations and guarantee the accuracy of their financial and accounting information which must provide a true and fair view of their assets and financial position.

Moreover, and given that the business sector to which the TOUS Group belongs involves the adoption of specific measures to prevent behavior related to money laundering and terrorist financing, manufacturers and suppliers must pay special attention to this duty to show due diligence and not perform any action intended to promote, facilitate, participate in or conceal any type of operation related to money laundering and/or terrorist financing.

### III. RESPECT FOR HUMAN RIGHTS

- **Non-discrimination, mutual respect and equal treatment:** manufacturers and suppliers must base their employment relationships on the principles of non-discrimination, mutual respect and equality. In line with this, manufacturers and suppliers cannot perform any kind of discrimination based on ideology, language, religion or beliefs, belonging to an ethnic group, race or nation, gender, sexual orientation, family situation, illness or disability or for performing the legal or union representation of workers.
- **Protecting and looking after labor rights:** Manufacturers and suppliers may not impose labor or Social Security conditions that harm, suppress or restrict the rights recognized for workers

through legal provisions, collective agreements or individual contracts; and any work related to child exploitation or similar is expressly banned.

- **Ban on harassment or abuse:** relationships must be based on professional respect and mutual cooperation. Any manifestation of violence, abuse of authority, harassment or conduct creating an intimidating or offensive environment is expressly banned.

Likewise, the use of forced labor or mandatory labor due to a contract, debt or conviction is expressly banned, as is the use of any practice intended to coerce a person to continue in employment.

- **Respect for freedom of association and collective bargaining:** Manufacturers and suppliers must recognize and respect their employees' right to freedom of association and collective bargaining, as well as the creation of trade union organizations, without being subject to any retaliation.

#### IV. COMMITMENT TO OCCUPATIONAL HEALTH AND SAFETY

Manufacturers and suppliers must comply with the health and safety conditions required by the applicable occupational health and safety regulations. Manufacturers and suppliers also undertake to implement those safety measures necessary and required by law, as well as those that increase the protection standards for all staff and help to reduce occupational risks.

#### V. CONFIDENTIALITY OF INFORMATION

Manufacturers and suppliers must treat as confidential the content of information related to their work for TOUS, not disclosing it or using it for personal purposes, especially protecting any information that is the property of the TOUS Group.

Manufacturers and suppliers must also respect and protect the privacy of those with whom they have relationships and who have provided their personal data or any type of confidential information. To do this, they must have the specific policies and appropriate security measures to guarantee compliance with the requirements established in the applicable data protection regulations.

#### VI. RESPECT FOR THE ENVIRONMENT AND PUBLIC HEALTH

Manufacturers and suppliers must make an ongoing commitment to respecting the natural environment, the rational consumption of resources and minimizing their environmental impact. For these purposes, manufacturers and suppliers must strive to comply with the standards and requirements established in the applicable local and international legislation, as well as follow the best practices in their sector.

Specifically, manufacturers and suppliers must:

- Promote the establishment of controls for spillages, emissions, noise, vibrations, waste, gases that destroy the ozone layer and any other environmental threat;
- Carry out impact assessments on any projects that may affect the environment; and
- Encourage the use of sustainable and environmentally-friendly materials, establishing controls over any activity or product that may directly or indirectly create a risk to collective safety and/or public health.

### **3. IMPLEMENTATION OF AND COMPLIANCE WITH THE CODE OF ETHICS FOR MANUFACTURERS AND SUPPLIERS**

Manufacturers and suppliers are responsible for ensuring that their employees and subcontracted third parties who provide services to TOUS are aware of, understand and apply this Code of Ethics.

This Code of Ethics for manufacturers and suppliers is aligned with the principles and values contained in the TOUS Group's Code of Ethics, available on the corporate website. Compliance with it will be monitored and supervised by the TOUS Group's Ethics and Compliance Committee.

As a result, manufacturers and suppliers must allow TOUS to supervise proper compliance with this Code of Ethics. For this, they will provide the means and access to the facilities, as well as the documentation necessary to ensure this, if deemed necessary.

The TOUS Group has a Whistleblowing Channel that can be used for the strictly confidential reporting of possible breaches or irregularities committed inside or outside the organization, related to any practice or conduct that is not in keeping with the regulations and/or the organization's Code of Ethics and with this Code of Ethics for manufacturers and suppliers.

### **4. CONTACT**

For more information on TOUS' sustainability and compliance practices, please visit its corporate website or contact the TOUS Group's Compliance Department at the following e-mail address:

[compliance@tous.com](mailto:compliance@tous.com)