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# URÍA MENÉNDEZ

Supplier Code of Conduct

1 December 2019

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# 1. Purpose and scope of application

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Since its incorporation in 1946, Uría Menéndez Abogados, S. L. P. (“**UM**” or the “**Firm**”) has been a reference law firm at a national and international level. It provides legal services pursuant to the principles and values of honesty, decency and respect for professional conduct rules and the law.

The Firm is committed to providing quality services and its suppliers (“**Suppliers**”) play a vital role in safeguarding its values and principles. It seeks to establish relationships based on trust, mutual benefit and respect for free competition.

The Firm’s Supplier Code of Conduct (the “**Supplier Code of Conduct**”) sets out the minimum standards that Suppliers are expected to meet during their relationship with the Firm. They are grouped into four core areas:

- (i) human rights;
- (ii) work practices;
- (iii) environmental responsibility; and
- (iv) conduct and compliance.

UM approaches these core areas in accordance with the Ten Principles of the United Nations Global Compact.

The Supplier Code of Conduct applies to all of UM’s Suppliers. A Supplier is any natural or legal person, or other legal entity, who in a professional capacity sells goods or provides services that are not directly related to UM’s clients or professional matters, regardless of the Supplier’s nationality or where the services are provided.

The Supplier Code of Conduct should be read in conjunction with the provisions regulating the legal relationship between the Supplier and UM. A Supplier must expressly undertake to abide by the Supplier Code of Conduct before signing an agreement with UM.

UM will periodically review the Supplier Code of Conduct and amend it as necessary. Suppliers must be familiar with its content at all times ([www.uria.com](http://www.uria.com)).

Suppliers must ensure that their employees or the third parties they engage to perform services for UM are familiar with and abide by the Supplier Code of Conduct.

## 2. Core areas

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### 2.1. HUMAN RIGHTS

UM applies the Ten Principles of the UN Global Compact and respects and supports human rights. It is committed to promoting human rights in its relationships with Suppliers and, to that end, expects Suppliers to do the same.

### 2.2. WORK PRACTICES

Suppliers will ensure fair working conditions and will

- respect their employees' rights to freedom of association and collective bargaining;
- not use forced or coerced labour;
- not engage in or condone child labour;
- ensure that the workplace is free from discrimination based on gender, race, religion, political affiliation or sexual orientation;
- comply at all times with health and safety regulations.

### 2.3. ENVIRONMENTAL RESPONSIBILITY

Suppliers undertake to protect and respect the environment.

### 2.4. CONDUCT AND COMPLIANCE

Suppliers undertake to comply with the applicable legal obligations from time to time. UM expects Suppliers to respect the law and regulations and to endeavour to fulfil international standards and other legal provisions or regulations, regardless of whether they apply in the Suppliers' country of origin or in the country where the services are provided.

For instance, Suppliers will pay particular attention to the following matters:

#### **2.4.1 Corruption**

Suppliers must ensure that they do not carry out acts of corruption and bribery, including influence peddling and facilitation payments, in their own name or for their own benefit or in the name or for the benefit of UM, vis-à-vis third parties, whether individuals, public authorities or civil servants or other public workers, national or foreign, or vis-à-vis UM or anyone who works at UM.

UM outright rejects any conduct aimed at altering the objective decision-making of persons with whom it has dealings, whether in the public sector (in Spain or abroad) or private sector. The Firm has a zero-tolerance policy towards all forms of corruption and bribery, and expects the same of Suppliers.

#### **2.4.2 Conflicts of interest**

Suppliers must act transparently and communicate to UM any situation that may give rise to a real or potential conflict of interest in their dealings with UM. This includes any situation that may affect the objectivity of UM or its members when using the services of a Supplier.

#### **2.4.3 Money laundering and the financing of terrorism**

Suppliers undertake to collaborate with UM to prevent money laundering and the financing of terrorism and, to that end, will uphold the highest business conduct standards when hiring employees.

#### **2.4.4 Confidentiality and data protection**

All information regarding the Firm, its members, clients or third parties with whom it collaborates is confidential.

Suppliers must store and keep confidential all the information they obtain in the course of their services or to which they, their employees or the third parties they engage have access in the course of their services to the Firm.

In addition, Suppliers will process the personal data to which they have access in the course of their services to UM as instructed in writing by UM from time to time and, in any event, in accordance with the applicable personal data protection regulations from time to time. Unless the parties agree otherwise, Suppliers are data processors of the personal data to which they have access in the course of their services to UM. They must comply with Article 28 of Regulation (EU) 2016/679 of the European

Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) and must not use the data for purposes other than to provide the services.

## 3. Compliance

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Suppliers undertake to carry out internal Supplier Code of Conduct compliance audits and keep UM informed at the latter's request.



## 4. Contact

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Questions regarding the Supplier Code of Conduct should be sent via email to the Firm's Purchasing Department ([compras@uria.com](mailto:compras@uria.com)).

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