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Empathy's Code  
of Ethics and Conduct

# Suppliers



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EMPATHY.CO



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## Introduction



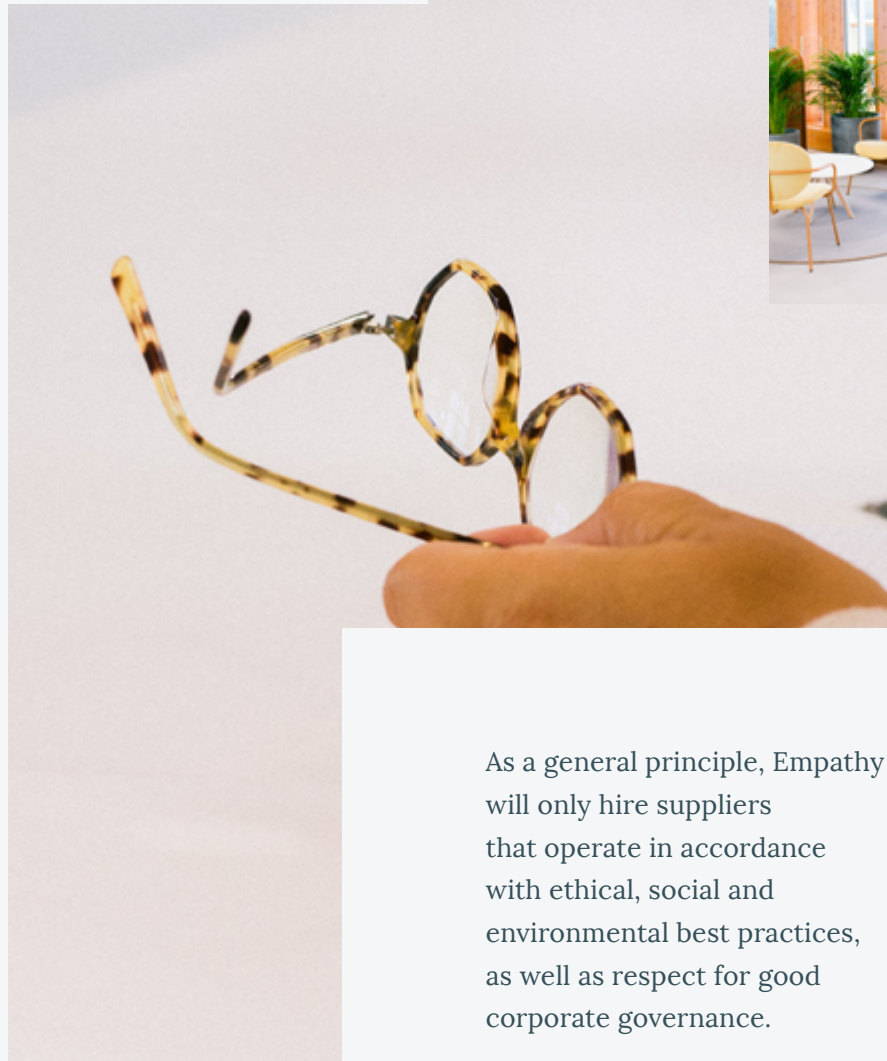




# Empathy.co promotes ethical values in its business activities and expects the same from its Suppliers.

Acting ethically and responsibly requires, but is not limited to, observing and complying with all applicable laws and regulations and doing business in a manner that respects and supports basic human rights principles when interacting with our company.

Empathy.co is committed to establishing a framework of mutual respect, transparency and trust with its suppliers.



As a general principle, Empathy will only hire suppliers that operate in accordance with ethical, social and environmental best practices, as well as respect for good corporate governance.



To this end, the company has adopted this “Supplier Code of Ethics and Conduct”

which sets out the expected practices, standards and principles as the basis of the relationship with our suppliers

with the aim of achieving continuous improvement and excellence in our business.

# 02

## Purpose and scope





Empathy considers its suppliers indispensable to achieve its growth objectives and improve the quality of service, trying to build relationships with them based on trust and in accordance with our ethical values.

## Compliance with the principles included in this Code of Ethics and Conduct for Suppliers is key when selecting and evaluating suppliers.

The Supplier Code of Ethics and Conduct determines specific values on:

Human and labour rights

Ethics and transparency

Environment


Confidentiality, privacy and intellectual property





# Empathy.co requires its Suppliers to comply with these principles

as well as to refrain from carrying out, expressly or tacitly, any conduct that, by rule or by illicit or criminal activity, may cause economic or reputational damage to our company.



## Empathy.co will encourage communication so that suppliers are aware of and comply with this Code.

This Code complements the specific agreements with each supplier.



# Guiding principles for Empathy suppliers



## A. Human Rights and Labour Rights

Empathy's  
reputation rests on

# Empathy integrity and transparency

of our suppliers and partners who support us  
in our daily business.

All of our suppliers are committed to protecting Empathy's image and reputation in business relationships and will carry out their activities with the highest degree of business ethics and transparency.

Empathy will not tolerate any practice contrary

to this Code or to the Code of Ethics and Conduct that contains the basic rules of coexistence that govern relations between the parties.

Likewise, the Suppliers agree to collaborate in all those actions in which Empathy needs the collaboration for inspections or audits.

B. Human Rights and  
Labour Rights

Empathy.co  
demands strict  
respect for human  
and labour rights  
from its suppliers.

Hence, suppliers must  
comply with applicable  
labour, health and safety  
laws for their employees.







Suppliers are also urged not to carry out anti-discriminatory practices and avoid any activity that does not respect ethical standards and values.

Ensure that human rights are respected.

Recognise freedom of association and the right to collective bargaining, in accordance with applicable laws.

Avoid discrimination in the workplace and in employment on the basis of sex, gender, race, religion, politics, affiliation, age, sexual orientation, disability and other legally protected status.

Reject all forms of human rights abuse and advocate the elimination of forced and compulsory labour and the effective abolition of child labour.

Prevent any practice involving the threat or abuse of power for the purpose of exploitation and forced labour of workers.

Promote equality of opportunity among employees.



### C. Environment

Empathy.co is committed to the protection and preservation of the environment and complies with all applicable environmental regulations and standards, demonstrating good environmental behaviour.

Empathy.co  
therefore requires  
its suppliers to  
conduct their  
activities in an  
environmentally  
friendly manner

and comply with applicable national and international regulations, making every effort to minimise their environmental footprint and promote measures to address climate change and protect biodiversity.

Suppliers shall pay attention to: optimising the use of relevant resources, such as energy, water and materials; minimising waste; and promoting activities involving reuse and recycling, when practicable.

Suppliers must ensure the confidentiality of any information (personal data, sensitive business information, proprietary information) that they obtain in the relationship with Empathy.co.

Likewise, Suppliers agree to comply with all applicable laws and regulations on data protection and privacy and will carry out the processing of data in the performance of their contractual relationship with Empathy.

Suppliers shall not disclose, transfer, divulge or share

confidential information or personal data relating to Empathy without prior consent and authorisation.

Furthermore, the supplier, as part of its collaboration with Empathy, must ensure that they don't infringe the intellectual and industrial property rights of Empathy and/or third parties.

Whistleblowing  
Channel





# Empathy.co provides its suppliers, through this Code a channel that allows them to report confidentially

those actions or behaviours that may be considered likely to violate the Code of Ethics of our company.




You can find more information




# Adherence and Compliance with the Code





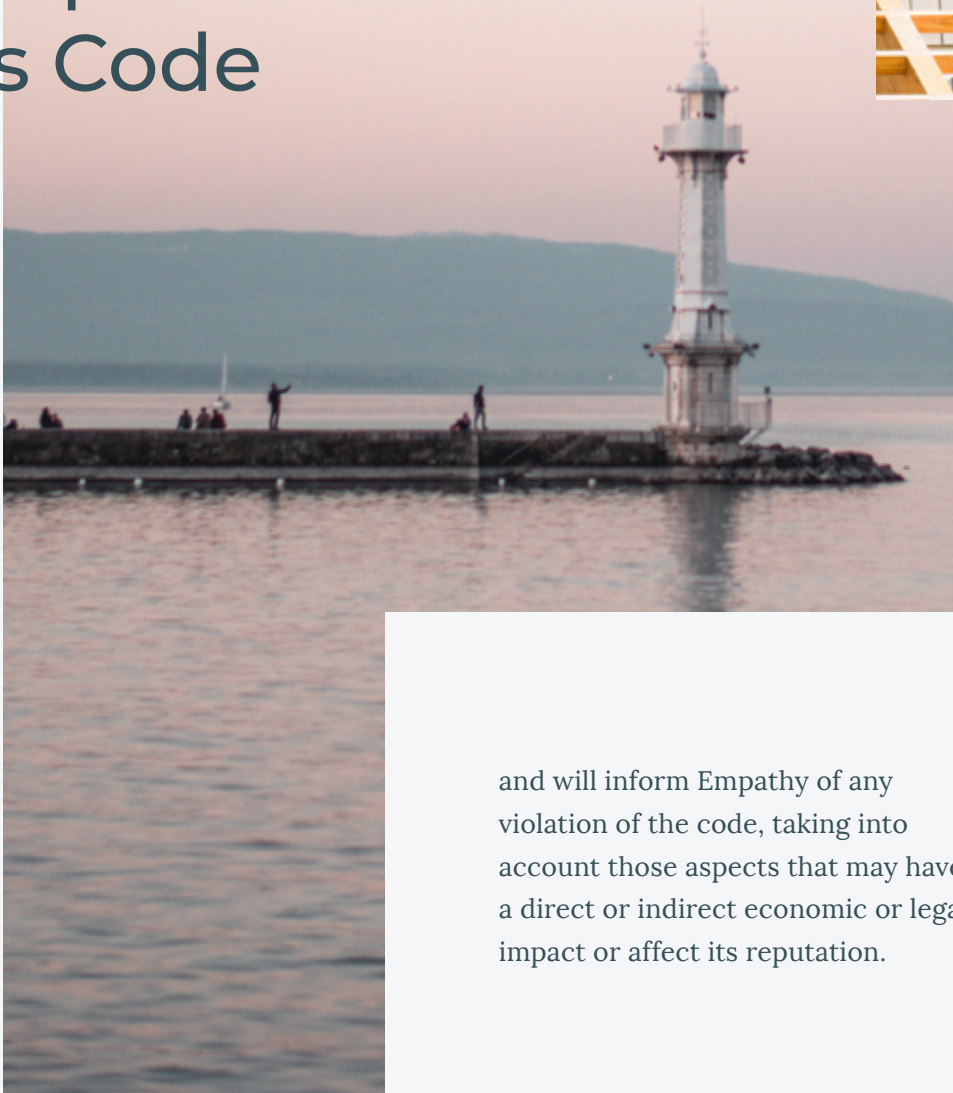
# Suppliers formally agree to comply with this Code from the beginning of the relationship with Empathy.co



Suppliers will establish appropriate mechanisms to effectively promote this Code to their employees and, in particular, to anyone working for Empathy.

Non-compliance with this Code by the supplier may have consequences for the contractual relationship with Empathy. Depending on the seriousness of the violation, these consequences may range from a formal warning to early termination of the contract, without prejudice to other legal or administrative actions that may be applicable. This matter will be included in the corresponding contract with the supplier.

# Suppliers will carry out internal monitoring of compliance with this Code



and will inform Empathy of any violation of the code, taking into account those aspects that may have a direct or indirect economic or legal impact or affect its reputation.





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