

SUPPLIER CODE OF ETHICS AND CONDUCT

*Version definitively approved by the Compliance, Transparency,
Social Responsibility and Good Governance Committee at its
meeting of 23 February 2026.*

**National Mint and Stamp Factory - Royal Mint of Spain
Public Business Entity, Own Means**

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1. Changes from the previous version

Significant changes throughout the document to incorporate various legal and regulatory compliance obligations.

2. Objective and scope

In its commitment to ethical and sustainable business management, the National Mint and Stamp Factory - Royal Mint of Spain (hereinafter, the "FNMT-RCM") carries out all its activities under the principles of quality, efficiency and safety, acting with integrity, honesty and social responsibility. It is these distinctive values of the FNMT-RCM that have earned it the trust of customers and citizens alike.

The FNMT-RCM is committed to the principles of social responsibility and has included them in its Codes of Ethics and Conduct, urging its suppliers, who are essential collaborators in its work, to establish and maintain management systems to guarantee them, thereby undertaking to observe high ethical standards in the development of their industrial and commercial activity.

This Supplier Code of Ethics and Conduct reflects the Entity's commitment to the principles of business ethics, integrity and transparency in all areas of activity, establishing a set of principles and guidelines for conduct that can also be applied to suppliers providing services to the FNMT-RCM.

3. Ethical commitments of FNMT-RCM suppliers

3.1 Ethical business transactions

The FNMT-RCM places integrity, trust and respect for the law at the heart of its business relations. Its suppliers and collaborators must carry out their activity in compliance with the legislation in force and applicable at all times, as well as with the commitments acquired in the contracts entered into, based on the premises of business and commercial integrity and honesty, with special attention to the following principles of conduct:

- Promote an open and fair business environment, avoiding practices that unduly restrict competition, distort prices or grant unfair competitive advantage, such as price fixing, bid rigging, market sharing and other forms of anti-competitive collusion.
- Respect industrial and/or intellectual property rights, especially in cases of technology transfer, technical know-how, patents, utility models, designs, registered trademarks, trade names, domain names and copyrights.
- Not disclose or misuse confidential information obtained in the course of the business relationship with the FNMT-RCM.
- Not offer bribes, facilitation payments, undue advantages or any gift or gratuities to FNMT-RCM employees that are intended to influence favourable treatment or affect

the transparency of the procedures for the procurement of any type of supply or service.

- Conflict of interest: Refrain from direct communication regarding the contractual relationship with any FNMT-RCM employee when there are indications of a conflict of interest, defined in this case as a situation in which said FNMT employee, their spouse, partner, or relatives up to the fourth degree of consanguinity or third degree of affinity¹, has a direct or indirect financial, economic or personal interest that could appear to compromise their impartiality and independence in the context of a tender procedure, or in the contractual relationship with the supplier.
- Immediately report any potential conflict of interest detected in the context of the relationship with the FNMT-RCM, preventing the participation of persons affected by them in the negotiations and decision-making relevant to this relationship and its purpose.
- Refrain from using, for the purpose of conducting business or obtaining business opportunities with or on behalf of the FNMT-RCM, persons who have been employed by the FNMT-RCM or held political or managerial positions in public administrations during the last 2 years, their spouses, persons linked by a similar relationship of effective cohabitation, ascendants and descendants, as well as relatives to the second degree by blood or affinity of persons who have been employees of the FNMT-RCM or held political or managerial positions in public administrations during the last 2 years. Except in cases where the supplier is a public entity or state-owned company.
- Not maintain a relationship with individuals, groups or entities included in sanctions lists, restrictions or search warrants issued by the European Union or international bodies, especially those related to terrorism, money laundering and crimes against human rights. This commitment includes refraining from using third parties to circumvent these sanctions.
- Promote anti-corruption surveillance and prevention measures within its sphere of action, to prevent and detect activities such as bribery, fraud, money laundering and embezzlement.

Any person or entity acting on behalf of or representing the FNMT-RCM, including commercial agents, customs agents and other intermediaries, as well as companies providing services to third parties, resellers and distributors, are required to identify themselves as representatives of the FNMT-RCM when dealing with public authorities in the course of their activities. The maximum limit for the amounts of gifts and hospitality received and granted, as detailed in the FNMT-RCM Code of Ethics and Conduct, shall also apply. In the event that gifts or hospitality exceeding the established amount are received, they must be recorded and the FNMT-RCM informed.

¹ 4th degree of consanguinity includes first cousins, great-uncles and aunts, and great-nephews and nieces. 3rd degree of affinity includes uncles and first cousins of spouses, as well as spouses of siblings.

3.2 Protection of human and labour rights

FNMT-RCM suppliers must respect, protect and promote universally recognised fundamental human and labour rights, ensuring compliance in their operations, value chain and business relations, with applicable legislation, agreements and conventions, as well as with the principles established in the Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organisation (ILO).

In addition, they must:

- Ensure remuneration and working hours in accordance with the obligations arising from applicable labour and social security legislation, particularly the obligation to comply with the wage conditions of workers in accordance with the applicable sectoral collective agreement. Failure to comply with these obligations may not be excused by the use of corporate structures designed to limit liability, the distribution of dividends or other financial transactions, unless otherwise provided by law.
- Prohibit and prevent forced, compulsory or coerced labour, refraining from any direct or indirect benefit from such practices. The exploitation of prison labour or labour in conditions of deprivation of liberty is expressly prohibited, even when it is in accordance with local legislation and applicable international conventions.
- Combat child labour and exploitation by refraining from using children under 16 as labour, and by avoiding practices that may expose children under the age of 18 to unhealthy or hazardous conditions, or interfere with their education and personal development.
- Actively promote equal opportunities and treatment for its employees, regardless of skin colour, race, nationality, social background, health status, sexual orientation, political or religious belief, gender, age or other physiological, psychological or identity-related conditions.
- Respect the personal dignity, privacy and rights of each individual.
- Reject any humiliating or abusive treatment of persons, including violence, sexual exploitation or abuse, verbal or psychological harassment, degrading or inhuman treatment, coercion or corporal punishment, as well as the threat of such treatment.
- Respect, protect and facilitate workers' rights to freedom of expression, association and collective bargaining, refraining from actions aimed at hindering or limiting their exercise.
- Refrain from obtaining direct or indirect benefit from the exploitation of resources or business opportunities that involve support for or collaboration with acts of war, terrorism, population control, forced displacement, political repression, or deliberate restriction of access to essential needs.
- Protect and prevent reprisals against those who report suspected breaches of the law, internal policies, contractual agreements or the FNMT-RCM Codes of Conduct, by

providing anonymous and secure channels for submitting this information and collaborating transparently with the FNMT-RCM in its investigation and resolution.

3.3 Supplier commitments to health and safety

FNMT-RCM suppliers must respect and promote health and safety commitments. To this end, they must:

1. Assume responsibility for the health and safety of its employees, establishing a management system appropriate to the characteristics of the company, in accordance with the applicable regulations on occupational risk prevention.
2. Control risks and take preventive measures against accidents and occupational diseases, and minimise the consequences of those that could not be avoided.
3. Suppliers must provide their staff with training and information on safety and prevention measures in the workplace and in the services they provide for the FNMT-RCM, as well as awareness-raising activities on the importance of complying with these measures.

3.4 Quality and safety products and services provided

All products and services delivered by suppliers must comply with the quality and safety standards and parameters required by applicable laws, paying particular attention to compliance with the respective contractual clauses relating to prices, compliance with the agreed product or service specifications (product/service quality), and delivery times.

3.5 Environment

The FNMT-RCM expects its suppliers to be committed to good environmental management of their processes and resources by implementing the following practices, among others:

- Provide adequate resources to incorporate and/or maintain an environmental management system appropriate to the activity undertaken.
- Promote the efficient use of energy, water and natural resources.
- Take preventive measures against pollution.
- Identify and manage substances that pose a hazard to health or the environment when released, to ensure their proper handling, transfer, storage, recycling or reuse, and safe disposal.
- Control and treat, prior to discharge or disposal, waste water and solid waste generated in industrial operations and processes.
- Control and treat, prior to release, atmospheric emissions of volatile organic compounds, aerosols, corrosives, particulates, ozone-depleting chemicals, and combustion by-products generated by industrial activities.
- Calculate, in accordance with applicable regulations, the level of greenhouse gas emissions produced by the company's activities and energy consumption, and take

reasonable measures to estimate the level of emissions produced at other stages of its value chain.

- Establish action plans for the elimination or progressive reduction of polluting or harmful components and greenhouse gas emissions.
- Take appropriate measures to understand, minimise and offset the direct impact of its infrastructure and operations on biodiversity, forest cover and local native species, and fully comply with the European Union Deforestation Regulation (EUDR).

3.6 Internal Reporting System

The FNMT-RCM has established a secure and anonymous Violations Reporting System, so that any interested party can report conduct by any FNMT-RCM professional, intermediary or third party that may constitute an act contrary to the law, the agreements signed, or the provisions of the organisation's Codes of Ethics.

Suppliers must report as soon as possible any of the above conduct of which they become aware through their business relationship with the FNMT-RCM.

By the means indicated by the FNMT-RCM, they must also inform their employees and other relevant interested parties of the existence and availability of the aforementioned FNMT-RCM Violations Reporting System, facilitating the exercise of their rights.

Complaints will be processed in accordance with the provisions of Law 2/2023 of 20 February on the protection of persons who report regulatory and anti-corruption violations, the FNMT-RCM Compliance Manual, and the procedure for managing the system for reporting violations.

4. Ethical commitments of FNMT-RCM suppliers

The principles of social responsibility defined in this document "form an integral part of the FNMT-RCM's general terms and conditions of contract" and/or its specific conditions and/or contracts, and are therefore enforceable on any contracted supplier, who undertakes to communicate these rules to its staff (employees, managers and collaborators) and, where applicable, subcontractors, so that they may establish the appropriate measures to promote compliance.

Within 10 days of receiving the request, the supplier must provide evidence of compliance with the terms of this Code of Conduct, of the process of internal investigations, or of compliance with the legal requirements applicable to it in terms of due diligence and institutional transparency.

Likewise, the FNMT-RCM reserves the right to conduct surveys and audits of its suppliers, either directly or through accredited independent third parties, with three months' prior notice, in order to verify compliance with the commitments set out in this Code of Ethics and other contractual agreements, and to assess the continuity over time of the technical and economic

capacity to meet them. The FNMT-RCM will conduct systematic surveys of its suppliers to ascertain the degree of progress made in the implementation of social responsibility policies.

The FNMT-RCM undertakes to preserve at all times the level of confidentiality of the information collected by these means, to guarantee the privacy rights of the persons who may appear in it, and not to use it to obtain undue advantages or for purposes other than those intended.

5. **Related documents**

<p style="text-align: center;">Link to Related Documents</p>
<p>P.G.CL.00004.0101 DECLARATION OF INFORMATION AND CONFORMITY. EXISTING AGENTS</p>
<p>P.G.CL.00004.0201 DECLARATION OF INFORMATION AND CONFORMITY. NEW AGENTS</p>
<p>P.G.CL.00004.03 AGENTS AND INTERMEDIARIES TRAINING</p>
<p>P.G.CL.00004.04 AGENTS AND INTERMEDIARIES TRAINING - ENGLISH</p>