

A decorative graphic on the left side of the page. It consists of a central point from which several rectangular blocks radiate outwards. The blocks are colored in shades of green and blue. The background of the entire page is dark blue with a pattern of fine, light blue lines radiating from the center.

SUPPLIER CODE OF CONDUCT

VERSION 1.8 – 2026



SUPPLIER CODE OF CONDUCT

In fulfilment of its public service mission within the Portuguese energy sector, and in the exercise of its responsibilities towards other companies operating outside the country,¹ REN is committed to defending and promoting the principles of sustainable development, constantly endeavouring to create value for its shareholders and other stakeholders.

This undertaking means that our activities are guided by principles of sustainability, following strict and measurable criteria and respecting standards of excellence, while never losing sight of the positive impact we wish to have on the communities and ecosystems within which we operate. The integrity of our actions is based not only on our conduct, but also on the behaviour of those with whom we do business. For this reason, REN intends to work with suppliers, service providers and subcontractors (hereinafter referred to as “Suppliers” or “Supplier”) who share these values and principles.

As a signatory to the UN Global Compact, REN has created this document on the basis of the 10 fundamental principles advocated by the Compact, which cover the areas of human rights, employment practices, environmental protection and anti-corruption, and are grounded in universally accepted statements.

Based on these principles, and in the belief that a transparent and socially responsible relationship between a company and its Suppliers must be rooted in clear and defined principles, REN has prepared this document to communicate to all its Suppliers, current and future, its values as a company seeking to supply goods and services to the market. This Supplier Code of Conduct applies to entities that provide, or intend to provide, goods and services to any of the companies within the REN Group, regardless of whether their headquarters are in Portugal or in another country.

REN undertakes to guide the selection of its Suppliers by principles of equity, transparency and efficiency in the established relationships, seeking to:

- Simplify procedures and minimise red tape, in order to eliminate unnecessary costs;
- Pay in a timely manner and in accordance with contractual arrangements;
- Encourage a close relationship with Suppliers, contribute to the avoidance of litigation, and, where it cannot be avoided, seek to settle disputes amicably in order to avoid recourse to judicial remedies;
- Scrupulously comply with rules on conflicts of interest, prevention of money laundering, and financing of terrorism and corruption.

Suppliers of the REN Group undertake to comply with the principles set out in this Code of Conduct, which are detailed below, and to make every effort to adopt sustainability policies and promote levels of excellence equivalent to those contained in this Supplier Code of Conduct with regard to their suppliers, service providers or subcontractors.

REN Principles of Conduct

The Supplier Code of Conduct addresses three key areas of conduct in business:

- I. Supporting and respecting fundamental human rights in the workplace;
- II. Complying with applicable standards and principles on Environmental Sustainability and Workplace Health and Safety;
- III. Ensuring that the highest standards of business ethics and integrity are maintained.

¹ REN Serviços, S.A. is the entity representing the other companies in the Group



I. Support and respect for fundamental human rights in the workplace

Applicants and potential Suppliers of the REN Group will affirm their support and respect for fundamental human rights in the workplace. REN expects its Suppliers to abide by the Conventions of the International Labour Organization (ILO), declaring and guaranteeing that their workers will fully enjoy all rights and duties established in national legislation and the International Conventions without any restrictions; no abuse or violation by Suppliers of fundamental human rights will be tolerated, and in turn Suppliers shall not tolerate any abuse or violations of which they may become aware.

- **Prohibition of child labour.** Suppliers of the REN Group undertake not to use child labour. Only workers aged over 15 will be employed, with the guarantee that the corresponding age and minimum compulsory schooling in the respective countries will always be respected (ILO Convention 138). If local law stipulates a higher minimum age for work or compulsory schooling, the higher age shall apply. Young people under the age of 18 shall not carry out work which, by its nature or the circumstances in which it is performed, could harm their health, safety or education (ILO Convention 182).
- **Working hours.** Suppliers of the REN Group undertake to respect, at a minimum, the requirements enshrined in national legislation or national agreements and/or industry standards with regard to the working hours of their employees (Conventions 1 and 47 and ILO Recommendation 116). Working additional hours shall be voluntary where possible and shall not be required as standard, nor shall it constitute a form of replacement for insufficient regular wages, and shall always be remunerated in accordance with national law and Collective Agreements.
- **Decent Salary Policy.** Suppliers of the REN Group undertake to ensure that employees receive fair and equitable wages, allowances and other benefits in accordance with their skills, roles and responsibilities, which are at least equal to those established in national legislation and international conventions (ILO Conventions 94 and 95 and Recommendation 135).
- **Any kind of inhuman treatment or threat thereof.** Suppliers of the REN Group undertake to ensure that there are no situations of inhuman treatment or threat thereof, including harassment or sexual abuse, corporal punishment, physical or moral coercion or verbal abuse of workers.
- **Professional development.** Suppliers of the REN Group undertake to promote employees' professional development and ensure that their skills are appropriate to the jobs that they perform.
- **Respect for collective bargaining.** Suppliers of the REN Group undertake to respect freedom of association and the right to collective bargaining (ILO Convention 154 and Recommendation 163).
- **Prevention of non-voluntary work situations.** REN Suppliers must at all times ensure that they do not use any kind of slavery or forced labour, do not engage in the transportation, recruitment, transfer or receipt of persons by means of threats or fraud, nor require any kind of financial guarantee or original identification document that could put the worker in a situation of slavery or forced labour. Suppliers should pay particular attention to vulnerable groups.

II. Respect for applicable rules and principles on environmental sustainability and health and safety in the workplace

Suppliers of the REN Group undertake to respect obligations regarding environmental sustainability and health and safety in the workplace. They undertake to ensure compliance with current legislation, regulations and requirements applicable to their activities:

- **Respect for the environment.** Suppliers undertake to make ongoing efforts in the field of environmental sustainability and to integrate good sustainability practices into products and services, as well as develop awareness and education programmes within the company on these topics.

Suppliers should develop climate change mitigation and adaptation practices.



Suppliers undertake to make efficient and sustainable use of resources, establish waste management strategies, increase the circularity of their products and/or services, and implement more energy-efficient and environmentally-friendly technologies, to disclose their carbon footprint, to progressively reduce their carbon-related activities, in line with available technology, and to establish mechanisms for the prevention and control of pollution. Suppliers also undertake to minimise any potential negative impact on biodiversity, prioritising solutions that protect and restore biodiversity and ecosystems, as well as preventing deforestation and conserving soil.

Suppliers should provide information on their emissions with regard to products and/or services provided, progressively integrating all approaches and categories within their scope of calculation.

Suppliers declare that they are aware of the REN group's emission reduction targets and accept the partnership with REN for the development of their sustainability performance.

- **Health and Safety at Work.** Suppliers of the REN Group undertake to ensure that relevant aspects of workplace safety are systematically upheld, and that they do not pose a risk to workers' health (ILO Convention 155). Appropriate training should be provided in the area of safety at work, and technical and human resources should be provided to promote safety and prevent the risk of accidents or incidents at work, or other adverse effects on workers' health. Continuous monitoring of risks associated with workers' activity should be ensured, and a plan for emergency situations should be prepared. Suppliers undertake to protect the life and health of their employees and community in the course of their business operations.
- **Management Systems and Model of Governance.** Suppliers should implement an appropriate compliance management system to measure and verify compliance with applicable laws, regulations and standards.

Suppliers should comply fully with applicable legislation and follow internationally-recognised environmental, social and corporate governance criteria, as well as make their best efforts to ensure that their suppliers and subcontractors implement these standards.

- **Due diligence in human rights and the environment.** Suppliers must implement due diligence processes commensurate with their size and activities, designed to identify, prevent, mitigate and remedy actual or potential adverse impacts on human rights, working conditions, the environment and affected communities. These processes should take into account, where relevant, the activities of Suppliers and their supply and subcontracting chains, including the periodic assessment of risks, the adoption of appropriate mitigation measures and the provision of channels for reporting concerns or adverse impacts.

III. Ensuring that the highest standards of business ethics and integrity are maintained.

Suppliers of the REN Group undertake to uphold the highest standards of corporate integrity and individual dignity, at all times adopting socially responsible behaviour, transparency, and prohibition of any kind of bribery and corruption.

- **Equal treatment and non-discrimination.** Suppliers of the REN Group undertake to uphold the highest standards of integrity and individual dignity and to ensure that there will be no discriminatory behaviour within the company, so that all workers may enjoy equal opportunities and treatment, regardless of their ethnic origin, colour, nationality, gender, sexual orientation, religious beliefs, age, political opinions, social origin or any other characteristic protected by law. Suppliers should respect diversity, equality, inclusion, human rights and the community. Suppliers undertake to comply with the applicable legislation regarding the provision of a mechanism for the anonymous reporting and subsequent investigation of irregularities, without fear of reprisals.
- **Ethics.** REN Group Suppliers undertake not to offer or accept any offer (goods, money, entertainment, leisure activities, etc.) whenever there are grounds for suspecting that such offers are intended to achieve objectives contrary to the principles and provisions set out in this Supplier Code of Conduct, in particular where they constitute attempts to influence the Supplier or REN,



as applicable. Particular attention should be paid to any decision or conduct on the part of any of their employees, thereby avoiding situations likely to give rise to conflicts of interest.

- **Integrity and compliance with the Law.** Suppliers of the REN Group undertake to ensure that their employees are treated as upstanding individuals whose professional performance is guided by strict moral values such as honesty, transparency, and respect for laws, regulations and, in the context of their business relationship with the REN Group, specifically the applicable standards on the processing and protection of personal data, combating corruption, separation of sector activities, competition, the environment, health and safety, intellectual property rights and the prevention of money laundering and terrorist financing.
- **Supply chain (subcontractors).** Suppliers must ensure that their subcontractors comply with requirements equivalent to those set out in this Code, and must maintain mechanisms for monitoring and assessing such compliance. Should any risks or adverse impacts be identified in the supply chain, Suppliers must implement appropriate corrective measures and monitor their effectiveness.
- **Confidentiality.** Suppliers of the REN Group shall respect intellectual property, business secrets and other confidential, proprietary or reserved information, and shall not make use of or disclose any such information, unless authorised to do so by REN. All information or data relating to the REN operations shall be treated by the Suppliers as confidential, unless they come to be in the public domain.
- **Business integrity.** Suppliers of the REN Group undertake to show respect for business integrity, with the absence of any kind of bribery, corruption, extortion and the like, establishing procedures and implementing necessary and appropriate measures to prevent the occurrence of such acts. Suppliers should refrain from offering gifts, goods or services free of charge, under the terms of the Code of Conduct. All businesses must be transparent and accurately reflected in their respective records and accounts. Suppliers should inform REN of potential situations of conflicts of interest.
- **Information security.** Suppliers of the REN Group undertake to ensure the security of information to which they have access and/or produce in the context of their relationship with REN, as well as the security of all associated resources, whether these are procedural, technological or human. The necessary means for secure management of information and support systems must be ensured, by means of an approach based on risk management and continued improvement, ensuring confidentiality, integrity and availability of information, in line with the applicable national and European legislation.
- **Cybersecurity.** In accordance with applicable national and European legislation, where the services, products or activities carried out may affect REN's systems, information, services or infrastructure, Suppliers must implement cybersecurity measures that are appropriate and proportionate to the existing risks. Where applicable, these measures should include access control, vulnerability and update management, business continuity, protection against unauthorised access and incident response. Suppliers must notify REN, without undue delay, of any relevant incident or vulnerability that may affect REN's information, systems, services or infrastructure, and must cooperate in the analysis, containment and resolution thereof.
- **Artificial Intelligence.** Whenever they use artificial intelligence systems in the provision of services to REN, Suppliers must ensure compliance with the applicable legislation and that such systems are used responsibly, transparently and securely. The use of Artificial Intelligence must respect the confidentiality of information, the protection of personal data, fundamental rights and intellectual property rights. REN's information must not be entered into public or unauthorised artificial intelligence tools, nor used to train or improve models, unless REN has given its prior written authorisation. The results produced by Artificial Intelligence systems must be duly reviewed and validated by the Supplier before being used or delivered to REN.
- **Anti-competitive practices.** The REN Group's suppliers undertake to comply fully with applicable national and international competition law and to promote a culture of fair and transparent competition in the markets in which they operate.

Suppliers must not engage, either directly or indirectly, in any practices likely to restrict, distort or prevent competition, including, but not limited to:



- Fixing or agreeing on prices, profit margins or other terms of sale or purchase;
- Sharing of markets, customers, suppliers, territories or business opportunities;
- Restriction, control or manipulation of production, distribution, investment or technological development;
- The exchange of commercially sensitive information with competitors, in particular information relating to prices, costs, commercial strategies, tenders, market shares or contractual terms;
- Agreements or arrangements designed to influence or manipulate public or private procurement processes, including collusive practices in tendering procedures.

Suppliers also undertake to implement appropriate measures to prevent and detect competition risks, ensuring that their employees, directors and subcontractors are aware of and comply with the applicable competition rules.

Any investigation, disciplinary proceedings, conviction or well-founded suspicion relating to breaches of competition rules that may affect the commercial relationship with REN must be reported to REN as soon as possible.

Failure to comply with the obligations set out in this section may constitute grounds for a review of the commercial relationship and for the application of such contractual measures as REN deems appropriate.

- **International sanctions and export controls.** Suppliers undertake to comply with the applicable legislation on international sanctions, embargoes and export controls, and to refrain from carrying out any transactions that might expose REN to legal or reputational risks.

Acceptance of and compliance with the Code of Conduct is a contractual obligation, and by adhering to this code the Supplier accepts the right of REN to conduct audits/inspections for the purpose of ensuring compliance with this Code of Conduct.

Failure to comply with the Supplier Code of Conduct may result in termination of the relationship with the Supplier, depending on the severity of the violation and the specific circumstances.

This Supplier Code of Conduct endorses the principles underlying the REN Code of Conduct and respective Annexes (which include: A) Integrity Policy; and B) Procedures for handling irregularities reports and for investigating irregularities), available at [\(REN Code of Conduct\)](#), which is a framework for the relational performance of REN's employees and other stakeholders, reflecting the Group's business culture and providing a valuable reference tool for guiding the behaviour of its employees and all those associated with REN. This Supplier Code of Conduct, in line with the REN Group Code of Conduct and its annexes, aims to ensure compliance with the standards of conduct and ethics that a Group such as REN must follow, while substantiating relationships of trust and transparency with all REN stakeholders. This Code of Conduct does not establish any commitments contrary to laws, regulations or contractual provisions in force, nor does it add to or derogate from new rights, and its rules are of a complementary nature.

By subscribing to this Code, the Supplier also undertakes to comply with the REN Group Code of Conduct and its Annexes [\(REN Code of Conduct\)](#), as well as the REN Group Social Responsibility Policy [\(REN Group Social Responsibility Policy\)](#).

Compliance

REN reserves the right to monitor compliance with this Supplier Code of Conduct, and Suppliers shall provide REN with detailed documentation on their financial situation, business activities, structure or other relevant aspects for the purpose of measuring compliance with this Code, as well as making themselves available for visits or audits by REN where necessary.

In the event of a breach of the provisions of this Supplier Code of Conduct or of the REN Group Code of Conduct and its Annexes by the Supplier, the latter shall be subject to any penalties provided for within the framework of the contractual relations established with REN, as well as to the reassessment of the terms of that relationship.



The reporting of any irregularities or infringements of this Supplier Code of Conduct or the REN Group Code of Conduct and its Annexes follows the procedures applicable to the handling of irregularities reports and the investigation of irregularities, which is Annex B) to the REN Group Code of Conduct and is an integral part of this Code.

Disclosure

By fully accepting the Supplier Code of Conduct, the Supplier tacitly accepts the commitment to disclose/communicate the applicable Codes and Policies to all workers involved in work for REN, and to ensure that they are enforced.

Approval, review and implementation

This Supplier Code of Conduct has been approved by REN and is reviewed periodically.



Declaration of Adherence to the Supplier Code of Conduct, REN Group Social Responsibility Policy and REN Group Code of Conduct and its Annexes

..... (name, identity document number and address), in the capacity of the legal representative of (1)
..... (company, tax identification number and head office or, in the event of a group enterprise, companies, tax identification numbers and head offices), having been made aware of the Supplier Code of Conduct, REN Group Social Responsibility Policy and REN Group Code of Conduct and its Annexes (which includes the: A) Integrity Policy; and B) Procedures for handling irregularities reports and for investigating irregularities), gives his/her word of honour that the party/parties he/she represents (2), for the term of the contract with REN, undertake(s) to comply unreservedly with the requirements set out in the same, with the Suppliers Code of Conduct, the REN Group Social Responsibility Policy and the REN Group Code of Conduct and its Annexes considered as being an integral part of the contract entered into therewith; and declares that he/she is aware that any breach of the same will constitute reason for termination of the contract. He/she also declares that he/she acknowledges that the Supplier Code of Conduct, REN Group Social Responsibility Policy and REN Group Code of Conduct and Annexes may come to be amended within legal parameters, and, as such, undertakes to consult these documents at www.ren.pt at least once every six months, in order to ensure that they are up-to-date.

..... (place), (date)

..... (signature (3))

(1) Applicable only to Qualifying Interested Parties that are legal persons.

(2) Where the Qualifying Person is a natural person, delete the words "the party/parties he/she represents".

(3) Signature of the legal representative(s) empowered to act.