

The background is a solid teal color. It features several concentric white circles of varying radii. Three solid-colored dots are placed on these circles: a yellow dot on a medium-sized circle, and two dark grey dots on larger circles. The text is positioned in the upper left quadrant.

# Policy on **suppliers**

GARRIGUES

2nd edition, June 2025

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## 1. Purpose

GARRIGUES is committed to strict compliance with the law and the highest standards of ethical conduct and transparency, both in the provision of its professional services and in all other areas of its activity.

The GARRIGUES Code of Ethics establishes the values and principles that shape the identity of the firm, as well as the standards and rules of conduct applicable to its members, clients and the third parties it deals with.

The purpose of this policy is to implement the values, principles and guidelines applicable to the process of engaging suppliers of goods and services, whether directly by GARRIGUES or by our clients but with the recommendation or suggestion of any member of the firm.

## 2. Criteria applicable to the engagement of suppliers by Garrigues

The engagement by GARRIGUES of any supplier of goods or services must be carried out in accordance with the following criteria and guidelines for conduct:

**(a)** Members of GARRIGUES will request more than one bid for consideration in each supplier engagement process to be carried out. As a general rule, members should attempt to obtain at least **three bids**.

Any exception to the above must be duly justified and expressly approved in advance by the director of the office or department (for Madrid office). For internal departments, authorization must be obtained from the department director or head.

**(b)** Suppliers must be assessed, selected and engaged in a way that ensures transparency, equal treatment and the application of objective and properly-weighted

criteria, with the aim of selecting those suppliers whose products or services offer the best conditions for the firm.

(c) GARRIGUES must assess suppliers' expertise, reputation, independence, organizational skills and capabilities for suitably and timely performing the contractual obligations and tasks assigned. Compliance with good practices in the areas of information security and sustainability will also be assessed.

(d) Goods must be purchased and services engaged through fully independent decision-making processes and without taking into account any personal, family or economic ties that might call into question the criteria applied in the selection process.

(e) As a general rule, members of GARRIGUES may not directly or indirectly offer, grant, solicit or accept gifts or rewards, favors, invitations, advantages or compensation from or to the firm's suppliers in cash, assets readily convertible into cash or any other kind of asset. Any exception to the above is subject to the provisions of Internal Policy IP-23 on measures to combat corruption, bribery and trading in influence.

(f) As a general rule, a contract in writing must be executed with all suppliers, in line with the standard-form documents existing at the firm, and such contract must include acceptance by the supplier of the GARRIGUES Code of Ethics for Suppliers, a copy of which is attached to this policy in **Schedule 1**.

Any exception to the above must be duly justified and expressly approved in advance by the director of the office or department (for Madrid office). For internal departments, authorization must be obtained from the department director or head.

### **3. Criteria applicable to the recommendation of suppliers to clients**

As a general rule, recommendations to clients of third-party suppliers of external services that are separate from and supplementary to those provided by us (such as experts, court procedural representatives, etc.) should be avoided.

In cases where clients insist that we recommend a supplier of this kind, this must be done with extreme caution and in accordance with the following guidelines:

(a) Except in duly justified cases, a minimum of **three suppliers** should be recommended or proposed for the client to consider, thereby avoiding any one supplier in particular being identified or associated with the firm.

(b) Suggestions or recommendations to clients regarding suppliers of this kind may only be made by professionals in the senior associate category or above.

(c) This type of recommendation must be made with absolute objectivity and independence, thereby avoiding any potential conflict of interest that could arise from the existence of any personal, family or economic ties with any of the proposed suppliers.

(d) It should be made clear that it is simply a suggestion and that it will be the client, and not GARRIGUES, who will directly engage the supplier, and that GARRIGUES does not accept any liability whatsoever deriving from the engagement of and/or services provided by the supplier.

## 4. Record of versions

Version	Date	Summary of changes made
1st edition	March 2021	Initial version
2nd edition	June 2025	Change to Schedule 1 Code of Ethics for Suppliers to bring it into line with the National Security System (ENS) standard