

CODE OF ETHICS AND CONDUCT FOR GCC SUPPLIERS



TABLE OF CONTENTS

1. Message to Our Suppliers
2. Guiding Principles and Relationship with GCC's Code of Ethics
3. Scope and Applicability
4. GCC's Expectations of Its Suppliers
5. Consequences of Non-Compliance
6. Reporting Channels and Protection Against Retaliation
7. Supplier Acceptance and Commitment



1. Message to Our Suppliers

At GCC, we believe that our relationships with suppliers should be based on trust, transparency, sustainability, and mutual benefit. This Code sets forth the principles, values, and expectations that guide our collaboration with current and potential suppliers. It is inspired by international best practices and the recommendations of the Global Cement and Concrete Association (GCCA), of which GCC is a member. Our vision is for every supplier to be a strategic partner in building a safer, more responsible, and sustainable future, strengthening both economic growth and social and environmental integrity.

2. Guiding Principles and Relationship with GCC's Code of Ethics

This Supplier Code of Ethics is based on GCC's Code of Ethics. GCC's guiding principles encompass health and safety, social responsibility, environmental protection, integrity, and respect for human rights. Our suppliers are expected to align with these principles by implementing equivalent policies in their operations and promoting their application throughout their own supply chains. Ethical commitment must be cross-cutting, integrated into every aspect of business activities, and guiding decisions toward long-term sustainability.

GCC's Commitment to Its Suppliers

At GCC, we are committed to maintaining relationships with suppliers founded on trust, transparency, and mutual respect, while also promoting sustainability, innovation, and the creation of shared value throughout the supply chain.

3. Scope and Applicability

This Code applies to all GCC suppliers of goods and services, as well as their contractors, subcontractors, and supply chains. Suppliers are expected to communicate and promote these guidelines among their own partners and collaborators. The application of this Code does not replace compliance with local or international laws; rather, it establishes a higher standard that GCC expects its entire supplier network to follow. The scope also covers related third parties, such as transportation companies, security services, maintenance providers, and any other intermediaries involved in the delivery of goods or services.



4. GCC's Expectations of Its Suppliers

4.1 Occupational Health and Safety

GCC suppliers must foster a safety culture focused on injury prevention and maintain an occupational health and safety management system, such as ISO 45001 certification. They must ensure that all employees, both direct and subcontracted, work safely, use appropriate personal protective equipment (PPE), and are not under the influence of drugs, narcotics, or alcohol. Suppliers must also comply with GCC policies and applicable legislation, receive proper training, and hold the necessary permits to perform high-risk tasks, including:

- (i) Energy isolation – LOTOTO
- (ii) Confined spaces
- (iii) Hot work
- (iv) Work at heights
- (v) Operation of mobile equipment and vehicles
- (vi) Load lifting maneuvers

Finally, suppliers are required to report to GCC any incident, accident, or injury that occurs during the execution of their services.

4.2 Decent Work Conditions and Fair Labor

Suppliers must ensure decent work conditions, fair wages, social benefits, and compliance with applicable labor regulations. Child labor and forced labor in any form are strictly prohibited. Suppliers must also firmly reject modern slavery in all its forms, guarantee fair working hours, timely payment of wages, and access to rights such as vacation, social security, and legally mandated benefits. Respect for human dignity must form the foundation of all labor relationships.

4.3 Freedom of Association and Non-Retaliation

Suppliers must fully respect workers' rights to freely associate, without exerting pressure or otherwise hindering this freedom. They must also ensure that employee representatives do not face dismissal, retaliation, or any form of discrimination for exercising labor rights, filing complaints, participating in union activities, or reporting potential legal violations.

4.4 Non-Discrimination and Inclusion

Employment decisions must be based on objective criteria, without distinctions based on age, gender, sexual orientation, religion, ethnic origin, disability, or political opinions. GCC encourages its suppliers to promote diversity and inclusion within their teams by supporting gender equity initiatives, disability inclusion programs, and employment opportunities for vulnerable communities.





GCC also strongly rejects any form of workplace harassment, whether verbal, physical, psychological, or sexual. Suppliers must implement clear measures to prevent, detect, and respond to harassment in the workplace, ensuring a safe and respectful environment for all collaborators.

4.5 Environmental Compliance and Impact Management

Suppliers must comply with current environmental regulations, obtain the necessary permits, and manage environmental impacts related to energy and water use, waste generation and handling, emissions, and biodiversity. Suppliers are expected to commit to continuous improvement and implement recognized environmental management systems, such as ISO 14001. GCC also encourages suppliers to innovate in resource efficiency, energy use, CO₂ emissions reduction, and material recycling.

4.6 Integrity and Anti-Corruption Practices

GCC maintains a zero-tolerance policy toward corruption, bribery, and extortion. Suppliers and their extended supply chains must not offer, promise, or accept bribes, improper gifts, facilitation payments, donations, scholarships, or other benefits intended to unduly influence business decisions. This includes low-value gifts intended to compromise impartiality in decision-making. Suppliers are expected to ensure full transparency in bidding, invoicing, and business relationships, consistently applying best practices in integrity.

4.7 Conflicts of Interest

Suppliers must avoid situations that present a real or potential conflict of interest. This includes family, personal, or financial ties with GCC employees that could influence the business relationship. Suppliers must disclose any such situations in a timely manner, before signing contracts or participating in bidding processes.

4.8 Fair Competition and Intellectual Property

Suppliers must comply with economic competition laws, avoid monopolistic practices, and protect intellectual property, including both GCC's and third parties'. This includes respecting trademarks, patents, confidential information, and confidentiality agreements. GCC expects business relationships that promote innovation and fair competition and rejects any form of collusion or price manipulation.

4.9 Social Responsibility and Human Rights

GCC expects its suppliers to respect and promote human rights across all operations, fostering responsible relationships with the communities in which they operate. This includes preventing risks such as child labor, human trafficking, and labor exploitation. Additionally, suppliers are





encouraged to support community projects, local economic development, and initiatives that improve the quality of life in communities near their operations.

5. Consequences of Non-Compliance

Failure to comply with this Code may result in corrective actions, suspension, or termination of the business relationship. GCC reserves the right to audit and evaluate supplier performance at any time. Possible measures include exclusion from bidding processes, cancellation of active contracts, and, in severe cases, notification to the relevant authorities. GCC will always promote opportunities for improvement, but in cases of repeated or serious violations, strict sanctions will be applied.

6. Reporting Channels and Protection Against Retaliation

GCC provides its suppliers with confidential channels to report misconduct, including the email address gcc@ethic-line.com, the website www.ethic-line.com/GCC, and the phone number **1-800-062-4008**. Reports may be submitted anonymously and will be investigated impartially and with due diligence. No retaliation will be tolerated against suppliers or individuals who report in good faith. GCC is committed to ensuring a trustworthy environment in which every concern is heard and addressed responsibly.

7. Supplier Acceptance and Commitment

By accepting this document, the supplier confirms that they have read, understood, and agree to comply with GCC's Supplier Code of Ethics and Conduct. This commitment also includes the responsibility to internally disseminate the guidelines set forth herein and to ensure that their personnel, subcontractors, and business partners engaged with GCC are aware of and apply them in their daily operations.

