

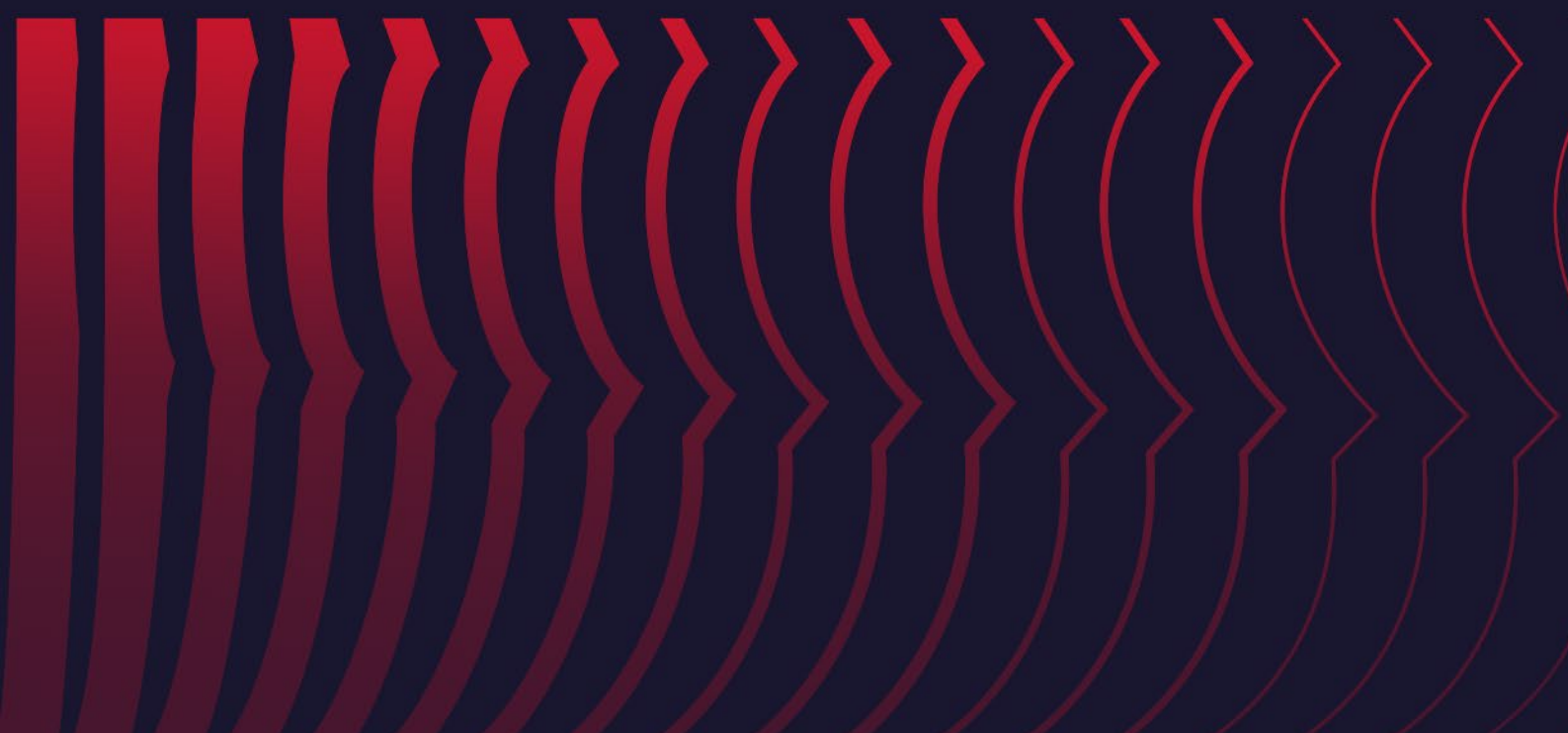


FC BARCELONA

FC BARCELONA'S SUPPLIERS' CODE OF CONDUCT

Version 03

JANUARY 2025





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1. Introduction

Futbol Club Barcelona and its related entities (hereinafter "FC Barcelona" or "the Club") are entities committed to complying with all applicable laws and regulations, with special attention to respect for human rights and compliance with anti-corruption regulations. That is why the reputation and integrity of our business partners are key for us.

As a general principle, contracting at FC Barcelona will be carried out with suppliers who work in accordance with the best ethical, social and environmental practices.

The purpose of this Code of Conduct is to establish the minimum standards of ethical and responsible behaviour that must be respected by all FC Barcelona suppliers.

2. General rules and principles of conduct

A. Compliance

FC Barcelona is committed to carrying out all its activities in accordance with current legislation in all areas of action and in all the countries in which it operates.

In the same way, the suppliers who provide services at FC Barcelona must strictly comply with current legislation, in accordance with the spirit and purpose of the laws, as well as with the internal regulations of the Club that apply to them.

Suppliers must involve their business partners in compliance with current legislation and international and sectoral best practices.

B. Ethical values

FC Barcelona's suppliers must comply with ethical compliance standards. In this sense, regardless of having their own Code of Ethics, the suppliers who provide services at FC Barcelona must know and accept the ethical values of the Club, set out in its Code of Ethics, in order to respect and act in accordance with what is mentioned in the document.

The FC Barcelona Code of Ethics is available on the Club's official website.



C. Respect for human rights and labour rights

FC Barcelona's suppliers must respect internationally recognised human rights, which include the rights set out in the "International Bill of Human Rights", the United Nations Global Compact and the principles relating to rights included in the "Fundamental Conventions of the International Labour Organisation".

In a non-exhaustive way, respecting human rights and labour rights implies for suppliers:

- Prohibit forced labour.
- Prohibit child labour.
- Prohibit discrimination based on sex, age, race, origin, ideology, among others.
- Respect the freedom of association and collective bargaining of its workers.
- Prohibit physical and verbal abuse or any other form of intimidation.
- Ensure that working conditions and environment (wages, working hours, maternity protection, promotion of a safe working environment, etc.) are consistent with applicable international labour standards; and
- To promote equal opportunities between men and women in all work processes and areas.

D. Equality

FC Barcelona's suppliers will promote the application of the principle of equality between women and men, as well as establish measures for the prevention and approach of any type of harassment and undertake actions to ensure its correct compliance.

In addition, in the event of the application of Spanish legislation, FC Barcelona's suppliers must have an equality plan and protocols for the prevention and approach of sexual and gender-based harassment.



E. Conflict of interest

FC Barcelona's suppliers, in the event of a conflict of interest during the term of the provision of the service, regardless of whether it is potential or actual, will undertake to take reasonable measures to fulfil the purpose of the service, always bearing in mind that the interests of both parties must be safeguarded.

F. Ethical behaviour and measures against bribery and corruption

FC Barcelona's suppliers must base their relations with the public and private sector, both nationally and internationally, on the principles of transparency and equal opportunities. They must rule out any action aimed at obtaining unlawful advantages over competitors, in the market or in public or private contracts. In this sense, they must maintain ethical behaviour that allows them to establish legitimate and productive relationships with the business partners with whom they interact.

Suppliers and any of their administrators, managers, workers or agents involved in the execution of the service must comply with current regulations on the fight against corruption, including the Spanish Penal Code, the UK Bribery Act, the US Foreign Corrupt Practices Act, as well as any other applicable international, national, state or local regulations in relation to corruption in business, bribery of public officials, influence peddling and embezzlement.

To prevent illicit conduct, suppliers must establish mechanisms to fight against all forms of corruption and bribery in the development of their activities and assume the following commitments:

- Suppliers shall not accept, offer or deliver, directly or indirectly, any commercial advantage or benefit that may imply preferential treatment by or in turn of any business partner with the intent to carry out or maintain unlawful operations.
- No payments will be made to facilitate or expedite procedures, which consist of the delivery of money or anything of value, whatever its amount, to ensure or speed up the course of a procedure or action before judicial bodies, public administrations or official bodies.



- The supplier must avoid any external interference or influence that may alter the impartiality and objectivity of its business decisions, especially in the procurement of goods, supplies and services. This obligation particularly affects people with decision-making capacity on these issues.

G. Respect for the environment

FC Barcelona's suppliers in the development of their activity must assume the commitment to ensure a high level of respect for the environment, as well as to minimise the negative effects that may eventually be caused. In addition, they must comply with and respect the obligations arising from environmental laws in the development of their activity, as well as with the criteria set out in international standards in this area.

H. Occupational health and safety

FC Barcelona's suppliers must apply the occupational risk prevention measures that apply to them.

In this sense, suppliers must carry out their activities in such a way as to achieve a high level of safety in their facilities, products and services, paying special attention to the protection of their workers, contractors, customers and the local environment.

Within the framework of the contractual relationship with FC Barcelona, the supplier that must carry out its activity at the Club's facilities must know and ensure that its workers and subcontractors comply with all the health and safety regulations applicable to them.

I. Confidentiality of information and the right to privacy

FC Barcelona's suppliers will not use or share confidential, reserved and/or secret information, except as expressly authorised.

FC Barcelona's suppliers will adopt the necessary measures to protect the information they access as a result of their contractual relationship with FC Barcelona.

FC Barcelona's suppliers must respect and protect the privacy of the people with whom they interact, guaranteeing compliance at all times with current regulations on the protection of personal data.



J. Defence of free competition

FC Barcelona's suppliers will refrain from entering into agreements with competitors, whether express or implied, that aim to influence market behaviour or alter free competition.

They also undertake to respect the applicable regulations on the defence of competition, always acting ethically and transparently in their relationship with competitors.

K. Intellectual and industrial property rights

FC Barcelona's suppliers are obliged to respect all intellectual and industrial property rights, as well as any rights held by a third party over any intangible asset (illustratively, *know-how*, trade secrets, image rights, domain names, etc.).

In relation to FC Barcelona, the suppliers undertake to follow at all times the indications indicated by the Club in relation to the use of content or assets protected by intellectual or industrial property rights. Any use of these assets will require prior written approval from FC Barcelona.

FC Barcelona's suppliers may not, without the prior written authorisation of the Club, commercially use the contracts it signs with the Club or carry out promotional, advertising or similar actions to which:

- a) Include implicit or explicit references to FC Barcelona or its players;
- b) Reproduce the registered trademarks or other distinctive signs of FC Barcelona; or
- c) Include in whole or in part the work resulting from the services provided to FC Barcelona.

The prohibition provided for in this section will remain in force even after the termination of the contracts signed between the supplier and FC Barcelona.



3. Code Accountability and Implementation

FC Barcelona's suppliers are committed to:

- Respect this Code for as long as they maintain their status as a supplier to FC Barcelona, acting in accordance with the laws in force.
- Communicate this Code to all its workers, as well as to the companies that subcontract within the framework of the contractual relationship with FC Barcelona.

4. Violations of this Code

This Code and all the principles of action regulated therein must be accepted by suppliers during the approval process. Failure to comply with this Code by suppliers may have different consequences with the contractual relationship with the Club.

5. Code Monitoring and Verification

FC Barcelona or third parties designated by it may supervise the proper compliance of suppliers with this Code. They undertake to provide the means and access to the facilities and documentation necessary to carry out the supervision.

6. Ethical Channel

FC Barcelona makes available to its suppliers, as well as to its members, staff, users, players, partners, collaborators or sponsors, and other related third parties, the Ethics Channel, which is enabled to receive and respond to all types of communications, queries or report irregularities or breaches, both of the Code of Ethics, internal regulations and applicable law. Additionally, it can also be used for the purpose of resolving doubts or for support on how to apply the Club's internal regulations and our values.

You can access the Ethics Channel through the following link:

<https://canaleticfcbarcelona.integrityline.com/>



FC BARCELONA

Acceptance of FC Barcelona's Supplier Code of Conduct

In _____, as of _____

Mr/Mrs. _____, in the name and on behalf of _____, duly authorized for this purpose, declares that has read and is aware of the Code of Conduct for FC Barcelona suppliers and undertakes to comply with it within the framework of any commercial relationship and/or collaboration with FC Barcelona.

Name and surname

Signature and seal