



PROCUREMENT POLICY

FIVEBIOENERGY, S.L.

3 December 2025

This Procurement Policy (the “**Policy**”) shall apply to all suppliers, contractors, and service providers delivering products and/or services to Fivebioenergy, S.L. (“**Fivebioenergy**”) with a staff of, at least, fifty (50) employees (the “**Suppliers**”).

1. Introduction

Fivebioenergy expects its Suppliers to operate in an ethical, environmentally conscious, and socially responsible manner. This Policy outlines the minimum standards we require from our Suppliers regarding human rights, labor conditions, environmental responsibility, ethical business, and compliance.

2. Scope

This Policy applies to all direct suppliers of Fivebioenergy and extends to their own suppliers and subcontractors. Suppliers are responsible for communicating and enforcing these standards throughout their supply chain.

The Policy is grounded in the following regulatory and normative frameworks:

- UN Guiding Principles on Business and Human Rights (2011).
- OECD Guidelines for Multinational Enterprises (2023): General Policies, Human Rights, Due Diligence Guidance for Responsible Business Conduct.
- ILO Core Labour Standards.
- UN Global Compact Principles.

3. Labor and Human Rights

Suppliers must respect fundamental human rights as outlined in the Universal Declaration of Human Rights and ILO Conventions:

- No use of child labor or forced labor.
- Equal treatment regardless of gender, background, religion, sexual orientation, or political beliefs.
- Decent working conditions, including health and safety.
- Reasonable working hours and fair wages, at least in line with local laws.

4. Environment and Sustainability

Suppliers must minimize their environmental impact and contribute to a circular economy wherever possible:

- Compliance with environmental laws and permits.
- Minimizing emissions, waste, water use, and energy consumption.
- Safe handling of hazardous substances and waste.
- Preference for eco-friendly materials and processes.
- Collaboration with Fivebioenergy to improve sustainability in the supply chain.

Recommended standards: ISO 14001, EMAS, or similar certifications

5. Ethical Business Conduct

- No form of corruption, bribery, extortion, or embezzlement is tolerated.
- Suppliers must have an internal code of conduct reflecting similar values.
- Conflicts of interest must be prevented or disclosed.
- All transactions and communication with Fivebioenergy must be transparent and auditable.

6. Animal Welfare and Biomass

For suppliers of biomass or manure, additional requirements apply:

- The origin of materials must be demonstrably responsible.
- No biomass that contributes to deforestation or biodiversity loss.
- Transparency about the composition and origin of delivered materials.

7. Grievance Mechanism and Incident Reporting

Suppliers must have a grievance mechanism for their employees and stakeholders. Serious incidents or violations of this Policy related to deliveries to Fivebioenergy must be reported within forty-eight (48) hours via: enquiries@fivebioenergy.com

8. Monitoring, Audits, and Compliance

- Fivebioenergy reserves the right to perform (announced or unannounced) audits or checks.
- Suppliers shall cooperate with information requests and self-assessments.
- In case of serious or repeated violations, the cooperation may be terminated.

9. Acceptance & possible Consequences

Our commitment to ethical sourcing is fundamental to ensuring that Fivebioenergy's growth is built on transparency, respect, and trust throughout our entire supply chain.

By entering into or continuing a business relationship with Fivebioenergy, the Supplier agrees to comply with this Policy. The Supplier shall implement any corrective measures required to comply with this Policy, otherwise Fivebioenergy may terminate the business relationship with the Supplier.

Annex 1

Self-assessment checklist – Fivebioenergy

Suppliers can use this checklist to assess their compliance with the Procurement Policy.

1. Does your organization have a policy against child and forced labor?

2. Do you have a policy for equal treatment and non-discrimination?

3. Are workplace safety measures in place?

4. Do you have an environmental policy or certification such as ISO 14001?

5. Do you have a code of conduct for employees?

6. Is there a grievance mechanism available to staff?

7. Are suppliers and subcontractors screened for sustainability and ethics?

8. Are regular audits conducted in your organization?

9. Do you have procedures to report incidents or integrity violations?

10. Is the origin of supplied raw materials of products traceable and responsible?