



TRIANGLE'S



SUPPLIER CODE OF CONDUCT

TRIANGLE'S COMPLIANCE 2024

INTRODUCTION

Triangle's – Cycling Equipments S.A., hereinafter also referred to as Triangle's or Society, promotes ethical business practices by implementing appropriate policies with the aim of ensuring that these standards are applied, internally and externally. We believe that this way it is possible to establish long-term ethical sustainability, responsiveness and innovation in the Supply Chain. We expect all our suppliers, any subsidiaries or subcontractors thereof, as well as other stakeholders who directly or indirectly relate to Triangle's to behave in accordance with this Supplier Code of Conduct. We believe that everyone assumes a perspective of continuous improvement and that they will take all necessary measures to comply with the provisions defined in this document.

This Code applies to all suppliers, service providers, subcontractors and companies acting on behalf of third parties at Triangle's – Cycling Equipments S.A. facilities.

The specific performance requirements of our suppliers, as well as the rules that apply to our commercial relationship, are extensively described in our Purchasing Procedure. With this Code we intend to meet our sustainability requirements for suppliers and their total alignment with our acquisition process.

We believe that we can only improve overall sustainability performance, improved working conditions and global protection of human rights through continuous development and close collaboration throughout our entire value chain.

We are aware that only through the continuous effort of everyone involved in our value chain can we achieve more transparency and effectiveness and work together for a better future.

POLICY PILLARS

The importance of the Supplier Code of Conduct is reflected in the 5 pillars of action that we have defined and that we hope to see reflected throughout our value chain.

Environmental responsibility: We require our suppliers to be active in minimizing their environmental impact and to operate in an environmentally responsible manner, focusing on reducing emissions, conserving energy and natural resources, as well as minimizing waste.

Labor and human rights: We seek to ensure that suppliers respect the rights of their employees by adhering to all relevant labor laws and regulations, including those related to fair wages, hours and working conditions.

Ethical sourcing: Ensure suppliers adhere to ethical sourcing practices, including anti-corruption measures and responsible management of natural resources.

Quality and compliance: ensuring that suppliers of materials that directly incorporate our product comply with Triangle's quality standards, as well as all relevant laws and regulations, including those related to product safety and intellectual property.

Traceability and transparency: implement systems for monitoring and verifying suppliers' compliance with the code of conduct, and ensuring that the origin and supply chain of aluminum products can be traced from source to end user in order to avoid use of matter from sources that contribute to human rights violations or environmental degradation.

1. RATIONALE

This Supplier Code of Conduct establishes the vision, commitments and requirements of Triangle's – Cycling Equipments S.A in order to ensure compliance with environmental and social standards in the supplier network. This includes, but is not limited to, respect for human rights and the sustainable extraction of raw materials.

Creating transparency around the entire supply chain is the main objective, and the social and environmental Due Diligence obligations associated with these same objectives are also defined.

We work to reduce the consumption of raw materials, through constant investment in innovation, seeking partners who provide us with guarantees of sustainability and commitment to action throughout the value chain.

This Code and Triangle's actions take into account the following international standards:

- ISO 9001:2015
- ISO 14001:2015
- ISO 45001:2018
- UN Global Compact
- Sustainable Development Goals - United Nations 2030 Agenda
- Charter of Human Rights published by the United Nations

Whenever national legal requirements are in conflict with Triangle's Supplier Code of Conduct, we will seek to prioritize the set of regulations that ensure greater transparency and sustainability in our value chain.

This Code also applies to all service providers acting on behalf of the Group, whether on our premises or outside.

2. ENVIRONMENTAL RESPONSIBILITY

When it comes to environmental responsibility, Triangle's – Cycling Equipments, S.A. suppliers must be aligned with our vision and way of operating:

- we expect our suppliers to fully comply with applicable national legislation governing the environment, occupational health and safety. Furthermore, our suppliers are expected to train and

develop training activities for their employees, with the aim of preventing occupational accidents and illnesses in the best possible way;

- we expect our suppliers to have an effective environmental policy and comply with all applicable laws, regulations and national standards to protect the environment.
- transparency regarding emissions data from its own operations. Furthermore, we expect our suppliers to implement effective measures to reduce their direct and indirect CO2 emissions (including their upstream supply chain) in accordance with the Paris Agreement.

2.1 BIODIVERSITY AND DEFORESTATION

Supply chain activities – including production and processing of raw materials – must protect natural ecosystems and stop conversion, deforestation and forest degradation based on the identification and handling of natural forests and other natural ecosystems.

2.2 MATERIAL RESTRICTIONS

Our suppliers and sub-suppliers must comply with all applicable laws and regulations regarding the restriction, registration and, where necessary, authorization or notification of chemical substances contained in the final product or production process in accordance with legal requirements that apply to the market corresponding.

Additionally, suppliers must adopt processes and best practices to not only ensure the supply of their products, but also address environmental, health and safety issues. Triangle's – Cycling Equipments, S.A. suppliers must ensure that all of their products containing electronic components that use a certain amount of gold, tin, tantalum and tungsten do not originate from conflict zones or any other adjacent countries or countries that are under embargo by US sanctions authorities, European authorities or any national authority.

Suppliers of materials that may contain any of the aforementioned materials must register on platforms such as CMRT.

2.3 SUITABILITY OF MATERIALS

Suppliers are expected to provide products that are fully compliant with relevant environmental product compliance legislation.

This legislation includes, but is not limited to:

- VLE, Directive 2000/53/EC
- REACH, Regulation (EC) No. 1907/2006
- RoHS, Directive 2011/65/EU
- CLP, Regulation (EC) No. 1272/2008
- Packaging Waste, Directive 1994/62/EC
- Substances that Deplete the Ozone Layer, Regulation (EC) No. 1005/2009

Suppliers must be aware of all updates and revisions to environmental product legislation, including the implementation, monitoring and documentation of respective measures.

3. HUMAN RIGHTS AND WORKING CONDITIONS

Based on the Human Rights and Working Conditions Policy that we define internally, it is very relevant for Triangle's – Cycling Equipments, S.A. that all its suppliers take Triangle's social responsibility into account and develop internally and in relationships with their own employees and the community in which they operate, procedures aligned with the principles and good practices defined in matters of human rights and working conditions.

Therefore, all suppliers are obliged to observe strict compliance with the principles and rights set out in the guidelines of the United Nations Initiative and the ILO Declaration on Fundamental Principles and Rights at Work and their Follow-up and align their actions and due diligence with the requirements of the United Nations 'Guiding Principles on Business and Human Rights'. Of particular importance are respect for human dignity and internationally recognized human rights, such as:

- the prohibition of child labor;
- the prohibition of modern slavery (i.e. slavery, servitude and forced slavery or compulsory labor and human trafficking);
- the prohibition of harassment and discrimination;
- guarantee the right to freedom of association and collective

bargaining and compliance with all applicable labor regulations, e.g., regarding working hours, wages and benefits and job security;

- protect indigenous communities and the local population and respect all beliefs and religions, as well as their practices, with a permanent perspective of inclusion;
- combat all forms of harassment and discrimination, developing internal policies and tools for evaluating their good applicability.

4. ETHICAL CONDUCT

When carrying out its activity, Triangle's – Cycling Equipments, S.A requires its Suppliers to respect the standards established in this Code and to assume a permanent perspective of mitigating the potential damage that their activity may cause to the local and general environment.

All suppliers must commit to setting targets for reducing their environmental footprint.

As described in our Purchasing Procedure, suppliers whose product directly incorporates our final product and those with more than 100 workers, are required to complete an annual questionnaire on various matters, including environmental issues and whenever deemed necessary, Triangle's reserves the right to carry out "in situ" audits of its suppliers.

5. FINAL PROVISIONS

Any violation of the principles and requirements established in this Supplier Conduct Policy will be considered a violation of the supplier in relation to its contractual obligations with Triangle's – Cycling Equipments, S.A.

If a supplier is suspected of violating any of the principles set forth in this Code, Triangle's reserves the right to terminate all business with all suppliers found to be in clear and verifiable violation of this Code and the Purchasing Procedure.

If a supplier evidently fails to comply with any of the principles and requirements set forth in this Code or refuses to implement measures to

improve its sustainability performance, Triangle's reserves the right to immediately terminate any or all contracts with the supplier for cause. . This Code is disclosed through direct disclosure to its suppliers and potential suppliers.

Annually, they are obliged, in accordance with the provisions established in the Purchasing Procedure, to complete a self-assessment questionnaire that complements this Code.

6. CONTACTS AND RESPONSIBILITIES

When supplier misconduct is suspected, employees and external or internal stakeholders can raise their concerns with their superior or contact the Ethics Manager.

Due Diligence of the Triangle's – Cycling Equipments, S.A supply chain is observed based on the 'Due Diligence Guidance for Responsible Business Conduct'. To verify suppliers' compliance with the standards and rules established in this document, we apply, for example, the Supplier Self-Assessment Questionnaire as well as in-situ audits whenever we consider necessary.

All suppliers must implement a due diligence process to ensure that their contractors and subcontractors also comply with the standards and rules established in this document. Suppliers must map their supply chain to effectively identify, analyze and prioritize material ESG risks and take appropriate steps to appropriately address them.

This code of conduct becomes effective on the date of approval by the Administration, according to the technical sheet at the end of the document

.

Document Control

Document issued on: 1st March 2024

Version no: 1

Effective Date: 1st March 2024

Developed by: People & Sustainability

Approved by: Executive Committee