

A low-angle photograph of a yellow building with the Centauro Rent a Car logo on top. The sky is blue with some clouds. The text is overlaid on the image.

**centauro**  
rent a car

**CODE OF ETHICS FOR  
SUPPLIERS AND PARTNERS  
CRIMINAL RISK PREVENTION SYSTEM**

A yellow circular graphic containing the Centauro logo.

**centauro** 

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# INTRODUCTION AND SCOPE



**Centauro's** strategy is based on ethically and responsibly managing our activities, striving for profitable growth through process excellence and talent management; all with the ultimate objective of creating value for all our stakeholders.

- »» We comply with the strictest principles of good governance and transparency.
- »» We maintain a sound financial structure and strict risk control with a view to ensuring that we meet our commitments.
- »» We pursue excellence in our process with a view to offering the best service to our customers and responding to their needs with the utmost quality.
- »» We use innovation and digitalisation as a lever for business development and process improvement.
- »» We forge strong relationships with our stakeholders based on dialogue and reciprocal commitment.
- »» Our responsible management also takes into account our environmental impact by promoting sustainable mobility.

**Centauro** sets out basic guidelines for its suppliers with regard to anti-corruption, human and labour rights and the environment.

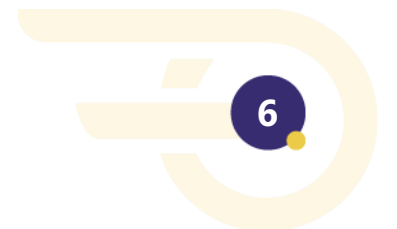
Through this code, **Centauro** conveys a message of absolute rejection of unethical behaviour, the commission of any type of legal or administrative violation, and the commission of any criminal offence.

In view of the foregoing, **Centauro** and its group companies require all their suppliers and partners to assume and comply with the strictest principles of accountability, transparency and business ethics. We have a zero-tolerance approach when it comes to legal non-compliance or gaining an advantage of any kind through unfair or illegal practices

This code is aimed at the suppliers, partners and business associates we deal with who have a commercial or professional relationship of any kind with us (hereinafter, suppliers), and shall be published on our organisation's website and on the main contact tools with our suppliers.

This Code should be seen as a summary of the primary ethical principles that should govern our suppliers' activity, without prejudice to the other regulations and commitments applicable to each supplier in accordance with the regulations in force, and the contractual provisions that govern the relationship entered into with our company. If a term of a contract or agreement is stricter than what is stated herein, then that shall prevail.

All of our suppliers and partners must comply with the action principles and guidelines set forth in this Code of Ethics for Suppliers and Partners.



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# COMMITMENTS AND PRINCIPLES OF ACTION



**Centauro** has established certain principles and values that should be treated as basic aspects of conduct or behaviour and that we expect to be followed by all peoples and companies that have entered into any kind of relationship with us.

- »» Know, respect and comply with the legal framework concerning the work of our suppliers, their responsibilities and obligations.
- »» Act with honesty, honour, and professional integrity.
- »» Treat people with respect and in a polite manner.
- »» Act in good faith, undertaking not to commit any malicious act against the interest of public image of the company or its employees and customers.
- »» Avoid conflicts of interest that may occur in any relationship with Centauro.
- »» Support and respect the protection of fundamental human rights and labour rights.
- »» Transparency in relationships with third parties.
- »» Avoid carrying out transactions and using financial products or instruments that breach tax or accounting regulations.



We have a **Criminal Risk Prevention Policy** which is available on our website:

[centauro.net/en/ethics](https://centauro.net/en/ethics)

We also have ethical rules for employees, as well as anti-corruption regulations and others to ensure that the ethical principles we require of the third parties we work with are fully complied with by us first and foremost.

No third-party dealing with us may, under any circumstances, respond to any request or order from any of our employees or managers, or any third-party purporting to act on our behalf, to perform any act or omission that directly or indirectly contravenes the ethical provisions set forth herein.

Should such a situation arise, you must refrain from such action or omission and report it forthwith through the whistleblowing channel.

## 2.1 INTEGRITY AND ETHICS | ANTI-CORRUPTION AND BRIBERY MEASURES

Our suppliers shall at all times act in accordance with the principle of integrity in all their business dealings and shall ensure that our company's image and reputation is preserved in all professional activities.

Our entity strictly prohibits any form of corruption and expects its suppliers to not, under any circumstances, commit or condone any form of corruption, bribery or extortion in business dealings. Offering undue advantage, including the payment or acceptance of bribes, to secure the supply of goods or products to our entity is strictly prohibited.

Suppliers shall not accept or offer any kind of gift or personal benefit (job offers, special discounts, preferential treatment, travel, or anything of value) to anyone associated with our company above and beyond standard business practices or courtesy. We also expect our suppliers not to use such mechanisms for the purposes of any kind of legal transaction for our entity.

Behaviour with regard to civil servants should be one of the utmost respect for the institution they represent. For this reason, we strictly prohibit any kind of irregular activity in the relationships that may be forged with civil servants, or that our suppliers may forge therewith on behalf of our 10 organisation.

## 2.2 HUMAN AND LABOUR RIGHTS

Our suppliers must strictly respect human and labor rights, complying with all applicable local or national labor regulations in the countries in which they operate or do business in.

Dignity, privacy, safety, security and any rights attributed to workers shall be respected at all times.

By way of example, including, but not limited to, they shall:

- »» Refrain from using child labour, complying at all times with the standards established by the International Labour Organisation.
- »» Respect and foster a good work-life balance. Respect the personal lives of employees and seek arrangements which strike a good balance between the two spheres.
- »» Respect the basic principles of equal opportunities, non-discrimination and consideration of diversity and inclusion in all its variables.
- »» Foster the integration of people with disabilities

- »» Have mechanisms in place to prevent physical or psychological harassment, aggression or any other situation of harassment that could lead to infringements of the rights of its workers..
- »» Recognise freedom of association and the right to collective bargaining, in accordance with the legislation in force in the country they operate in.
- »» Suppliers shall take the necessary measures within their organisation to eliminate all forms of forced or compulsory labor.

Under no circumstances shall our suppliers tolerate any kind of direct or indirect discrimination based on race, ideology, religion, creed, nationality, language, gender, sexual orientation, disability, age, legal or trade union representation status, or any other grounds.

## 2.3 HEALTH AND SAFETY

Our suppliers must comply with all obligations in accordance with occupational health and safety regulations, as well as the requirements which, where applicable, are communicated thereto by **Centauro**.

Foster safe and healthy workplaces by undertaking activities necessary to reduce the risk of accidents, injuries and exposure for their workers, including on construction sites.

Identify and assess potential emergency situations in the workplace and minimise the potential impact thereof by implementing emergency response plans and procedures.

They shall provide safety information on known workplace hazards, and the supplier's employees shall receive appropriate training and the necessary resources to perform their work to ensure that they are adequately protected, as well as appropriate health monitoring.

Suppliers shall be liable for any damage or loss for which they are responsible by action or omission, in particular as a result of their failure to take appropriate preventive health and safety measures to prevent such damage or loss.

## 2.4 ENVIRONMENT

Third parties that have a relationship with our company must treat the environment that surrounds them with respect, complying with environmental legislation, as well as with all the obligations that may be applicable thereto depending on their business.

To this end, including, but not limited to, they shall:

- »» Foster initiatives that promote greater environmental responsibility and the development of environmentally-friendly practices and technology systems.
- »» Conduct their business while taking into account significant opportunities and risks from an environmental perspective, minimising its direct negative impact on the environment.
- »» Encourage the rational use of energy and efficiency in the use of basic resources while maintaining a preventive approach that reduces the environmental impact of its operations and safeguards natural resources.
- »» Identify and manage substances and other environmentally hazardous materials as a result of their operations, in order to ensure the safe handling, transfer, storage, recycling or reuse and disposal thereof in compliance with applicable regulations.

## 2.5 DATA PROTECTION AND SECURITY

Our suppliers shall have appropriate mechanisms in place with regard to the security of information that they may be given or manage in the course of the work they perform for us. They shall ensure that information that is provided by us and/or they become aware of in the course of their relationship with us, given the confidential nature thereof, cannot be disclosed or transferred to third parties, unless such disclosure or transfer is expressly permitted in writing.

Furthermore, our partners must duly comply with all obligations arising from EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the Protection of Personal Data of Individuals (GDPR) and the national data protection regulations in force at any given time. To this end, they must comply with their obligations in this respect which are set forth in the Agreements they have entered into with our entity.

Where applicable, suppliers shall have business continuity and technological contingency plans in place that guarantee the continuity of the services offered.

## 2.6 QUALITY OF SERVICE

**Centauro** strives to provide an outstanding level of service to its customers and endeavours to continuously improve its quality and the customer experience. Our suppliers are expected to guarantee the utmost quality in all services offered, complying with the quality and safety standards and parameters pursuant to applicable laws, rules or regulations.

## 2.7 INTELLECTUAL AND INDUSTRIAL PROPERTY

Third parties dealing with our company must respect all regulations with regard to intellectual and industrial property in their relationships with us. Using any tool or information that does not comply with or does not have the licences required by the applicable regulations is strictly forbidden.



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# SUPPLIER RESPONSIBILITY



Our suppliers are required to pay particular attention to preventing and mitigating any conduct that could result in our company facing any kind of administrative and/or criminal liability.

The supplier must have a control and detection system in place to prevent the commission of acts that could be considered criminal offences. It is of the utmost importance that they foster vigilance and control with regard to activities such as money laundering, financing of terrorism, fraud or embezzlement.

The supplier's control systems shall be tailored to and consistent with the principle of proportionality, whereby the size, internal organisation, nature, scale and complexity of the activities carried out by the suppliers providing their services shall be taken into account with regard to the requirement for such systems.

Should the service provided by the supplier be carried out by subcontractors, they must ensure that these subcontractors comply with ethical commitments comparable to those set forth herein.

Suppliers shall monitor compliance with this Code internally and proactively report any non-compliance with this Code or the law to **Centauro** through the whistleblowing channel:

[centauro.net/en/ethics](https://centauro.net/en/ethics)

Suppliers may also avail of this channel to make enquiries with regard to practices or behavior that may be contrary to the content of this Suppliers' Code of Ethics or to the law in force.

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**KNOWLEDGE,  
ALIGNMENT  
AND COMPLIANCE  
WITH THE CODE**



This Code shall be published on our website:

[centauro.net/en/ethics](https://centauro.net/en/ethics)

It shall also be published in the main tools used to contact our suppliers. Should any changes be made affecting our company's position with regard to the aforementioned principles, these shall be indicated on our publicly accessible website.

All **Centauro** suppliers must endeavour to comply with this Code, through which we strive to ensure that the conduct of the people who have forged a relationship with our company corresponds to the principles of ethical behaviour that we advocate.

Furthermore, it is hereby understood that, if at any time it is verified, by any legally valid means, that the supplier does not strictly comply with this Agreement, the commercial relationship could be affected, being subject to review or termination on a case-by-case basis

**Centauro** reserves the right to audit its suppliers or to ask them to prove due compliance with the provisions set forth herein.