

PURCHASING POLICY APLICACIONES METALAYM, S.L. FOR SUPPLIERS WITH NUCLEAR SAFETY REQUIREMENTS

1. OBJECTIVE

This policy establishes the mandatory minimum requirements that all APLICACIONES METALAYM, SL suppliers must meet in the supply of goods, services, components, or activities that directly or indirectly impact nuclear safety.

Its purpose is to ensure that supplies meet the highest standards of **quality, safety, traceability, integrity and regulatory compliance**, minimizing risks to public safety, the environment and nuclear operations.

Compliance with this policy is essential to ensuring mutual trust, quality of supplies, and protection against technical, human, and regulatory risks in the nuclear environment.

This policy forms an integral part of all contracts, orders, and commercial agreements entered into with suppliers.

2. SCOPE

This policy applies to:

- All direct suppliers of APLICACIONES METALAYM, SL
- Subsuppliers or subcontracted entities at any level of the supply chain.
- Any activity, product or service classified as **important for nuclear safety** (IPNS – *Important to Nuclear Safety*).

3. REQUIREMENTS FOR SUPPLIERS

Suppliers must meet the following requirements, organized by thematic areas:

3.1. Quality Management and Non-Conformities

- Notify immediately, and within a maximum period of **24 hours**, any non-conformity detected in products, services, materials or documentation, including **Counterfeit, Fraudulent or Suspicious Items (CFSI – Counterfeit, Fraudulent or Suspect Items)**.
- Follow a quarantine and investigation protocol for CFSI items, aligned with regulations such as **10 CFR 21** (USA) or equivalent, as appropriate.
- Refrain from disposing, repairing or reprocessing non-conforming materials without **prior written approval** of METALAYM APPLICATIONS, SL
- Maintain a **Quality management system documented, implemented and, where contractually required, certified according to ISO 19443** or equivalent regulations.

3.2. Change Control

- Notify, within a maximum period of **48 hours** and through a standardized form, any change that affects:
 - The specifications of the product or service.
 - The manufacturing, control or testing processes.
 - The sub-suppliers or third parties involved.
 - The physical location of the manufacturing facilities.
- Obtain **prior written approval** for such changes, when specified contractually or by applicable regulations.

3.3. Access and Inspection

- Facilitate the **immediate and unrestricted access** to facilities, equipment, processes, personnel and technical documentation associated with the order.
- This access may be made **scheduled or unannounced** and will be exercised by:
 - Staff of APLICACIONES METALAYM, SL
 - End customers.
 - Certifying or regulatory entities.
 - Official bodies or their authorized representatives.
- The signature may be required **non-disclosure agreements (NDAs)** to protect sensitive information shared during inspections.

3.4. Traceability and Documentation

- Guarantee the **full traceability** of materials, processes, controls and verifications from origin to final delivery.
- Retain all relevant documentation (material certificates, test reports, inspection reports, qualifications, etc.) for a minimum period of **10 years**, or as stipulated by regulation or contract.
- Deliver copies of said documentation at the end of the contract, in **physical or digital format**, as agreed.
- Immediately notify any **loss, deterioration or alteration** of relevant records.

3.5. Subcontracting and Supply Chain Management

- Do not subcontract **critical processes** without express written authorization from APLICACIONES METALAYM, SL
- Submit a **list of sub-suppliers** for prior approval.
- Subject sub-suppliers to periodic audits and ensure they comply with contractual and regulatory requirements.
- Transfer form **explicit and verifiable** all the requirements of this policy to its own supply chain.
- Maintain a **effective and documented control** traceability and compliance at all levels.

3.6. Ethics, Anti-Fraud and Transparency

- Confirm in writing the **Reception and acceptance of the Corporate Anti-Fraud Procedure (PCFSI)**, available on the APLICACIONES METALAYM, SL supplier portal
- Complete and sign the **ASCSFI Self-Assessment Template** provided by the company.
- Actively cooperate in the **prevention, detection and resolution** of illicit, fraudulent or unethical conduct.
- Report any indication of fraud or irregular conduct within a maximum period of **24 hours**.

3.7. Technical Competence and Safety Culture

- Ensure that staff are **trained, qualified and authorized** for the assigned tasks, with updated certifications according to the applicable technical and legal regulations.
- Demonstrate commitment to the **nuclear safety culture** through:
 - Realization of **periodic training on the management of items important to nuclear safety**.
 - Promotion of the **continuous improvement and defense in depth**.

4. EVALUATION, MONITORING AND CONSEQUENCES

- APLICACIONES METALAYM, SL may carry out **scheduled or unannounced audits** to verify compliance with this policy.
- Failure to comply may lead to, among other consequences:
 - Rejection of materials or services.
 - Suspension of payments until satisfactory resolution.
 - Cancellation of the order or contract.
 - **Temporary or permanent exclusion from the register of approved suppliers**.
 - Legal and contractual claims for breach of conditions.

5. REGULATORY REFERENCES

This policy is based on the following standards, considered minimum and **Subject to expansion according to the requirements of each project, client or country**:

- **ISO 19443** Quality management systems for nuclear industry suppliers.
- **ASME NQA-1** – Quality assurance requirements for nuclear applications.
- **UNE 73401** – Quality requirements for supplies in nuclear facilities (Spain).
- **IAEA GS-R Part 2** – Leadership and management for safety (IAEA).
- **10 CFR 21** – Mandatory reporting of defects and non-conformities (USA).
- **Euratom Directive** – European regulations on nuclear safety and waste management.

Additional rules They may be established contractually and must be complied with in a mandatory manner.

6. ACCEPTANCE OF THE POLICY

The signing of this document implies the **express and unconditional acceptance** of the requirements defined herein. Compliance with them will be enforceable throughout the contractual relationship.

In the case of electronic acceptance, validation through the supplier portal or documentary system enabled by APLICACIONES METALAYM, SL will be considered valid.